

## Supplier Code of Conduct

Arcosa's Vision, Values, and Promise unite our businesses and teams and guide our actions, decisions, and ideas. A key Arcosa value is acting with integrity, being principled, honest, and fair. Ethical, responsible, and sustainable business practices drive Arcosa's culture, and we extend these expectations to our Suppliers. It is important that Suppliers abide by Arcosa's principles and values when conducting business with Arcosa. This **Supplier Code of Conduct** provides Suppliers with Arcosa's expectations for responsible business conduct consistent with Arcosa's Code of Conduct, policies, values, and sustainability efforts.

Therefore, to be recognized as a Supplier in good standing with Arcosa and eligible for working with Arcosa, Suppliers are expected to conduct business consistent with principles, values, and guidelines that are the same as or similar to those described in this Supplier Code of Conduct and Arcosa's Code of Conduct.

### **Definitions**

*"Arcosa" as referenced in this document includes Arcosa, Inc. and its subsidiaries and affiliates.*

*"Supplier(s)" as referenced in this document includes contractors, suppliers, vendors, firms, and their respective employees and agents, that are providing goods and/or services to Arcosa.*

*"Standards" as referenced in this document includes applicable governmental laws, rules, regulations, and professional and industry standards.*

### **Environmental Responsibility**

Suppliers will comply with all applicable environmental Standards, including but not limited to hazardous materials, air emissions, or waste and wastewater discharges, including manufacture, transportation, storage, and disposal. Where possible, Suppliers should act proactively to minimize waste, reduce emissions as a result of operations, and conserve limited natural resources such as water.

### **Human Rights**

Suppliers will comply with all governmental laws, rules, and regulations applicable to operations, including, but not limited to, fair employment practices and compliance with equal employment opportunity, safe and healthful work environment, equitable treatment of employees, and all other employment laws in the United States and other countries where they manufacture products. Arcosa expects suppliers to respect and support universally recognized fundamental human rights and freedoms, similar to Arcosa's alignment with the universally recognized fundamental human rights and freedoms set forth in the United Nations Universal Declaration of Human Rights.

**Child Labor, Forced Labor, and Human Trafficking**

Suppliers will comply with all governmental Standards applicable to their operations, including, but not limited to, fair employment practices and compliance with equal employment opportunity, safe and healthy work environment, equitable treatment of employees, and all other employment laws in the United States and other countries where Supplier provides goods and/or services to Arcosa.

As such, Suppliers must not use forced or compulsory labor and will comply with all child labor laws across Supplier's operations. Suppliers shall only employ workers of legal age of employment in the jurisdiction where they perform work. Arcosa Suppliers are prohibited from the use of any modern forms of slavery and any form of human trafficking.

**Health and Safety Guidelines**

Suppliers will adopt safety policies and practices intended to provide a safe and healthy workplace and ensure compliance with applicable Standards, such as from the Occupational Safety and Health Administration (OSHA) and/or the Mine Safety and Health Administration (MSHA) in the U.S. and similar Standards wherever the Supplier operates.

Suppliers are required to follow Arcosa facility-specific safety rules and training requirements when present at Arcosa facilities and to immediately report any unsafe condition or accident—no matter how minor—to an Arcosa manager or safety representative.

**Non-Discrimination**

Suppliers must be committed to equal employment opportunity for their workforce and provide workplaces free from unlawful discrimination, harassment, and retaliation. Suppliers shall not discriminate against employees in hiring, promotion, salary, performance evaluation or any other term or condition of work, on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion, disability, or any other basis prohibited by law in the applicable jurisdiction.

**Wages and Benefits**

Suppliers will pay employees and workers at least the minimum wage in accordance with local laws. Where the local laws do not set a minimum wage, Supplier will pay a reasonable market wage.

**Working Hours**

Suppliers will maintain reasonable employee work hours in compliance with governmental Standards in the jurisdictions in which they do business.

**Freedom of Association**

Suppliers shall comply with governmental Standards and respect the right of employees to join and organize associations of their own choosing and to bargain collectively, as well as the right to choose not to do so, without intimidation or harassment.

**Disciplinary Practices**

Suppliers will not inflict or threaten to inflict corporal punishment or any other forms of physical, sexual, psychological or verbal abuse or harassment on any of Supplier's employees or agents.

**Ethical Business Standards**

Suppliers will abide by general ethical business Standards, including: comply with all relevant laws; treat employees, clients, customers, and other suppliers honestly and fairly; prepare all records of financial transactions accurately; report financial conditions and results of operations honestly; and avoid improper giving and receiving of gifts or other valuable consideration.

**Conflict of Interest**

Suppliers will avoid actual and apparent conflicts of interest in business dealings with Arcosa.

**Conflict Minerals**

Suppliers shall avoid the use of prohibited conflict minerals (as defined by Rule 13p-1 under the Securities Exchange Act of 1934 (17 CFR 240.13p-1)) in their supply chain and cooperate with Arcosa's request for the Supplier's applicable conflict mineral information to support Arcosa's conflict mineral related disclosures to the U.S. Securities and Exchange Commission or other relevant surveys.

**Cybersecurity, Confidential and Proprietary Information**

Suppliers will respect the rights of others to protect their confidential information and intellectual property. Suppliers will comply with and adhere to relevant cybersecurity Standards intended to avoid a cybersecurity breach. When needed, Suppliers providing information technology services will comply with provision of control environment reports and certifications, including but not limited to SOC 1, SOC 2, and ISO27001.

**Communication**

Suppliers will take appropriate steps to ensure that the principles contained herein are communicated to employees and agents working on the Supplier's behalf.

**Compliance with Laws**

Suppliers will operate in full compliance with the laws of their respective jurisdiction. Acceptance of a Purchase Order or other contract from Arcosa will act as acknowledgment and confirmation of acceptance of the requirements listed in this Supplier Code of Conduct, including:

- Suppliers will comply with all applicable laws, rules, and regulations relating to international trade, including that they will not engage in transactions with prohibited countries, entities, or individuals;
- Suppliers will not engage in corrupt business practices, including bribery and will abide by applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions;
- Suppliers will compete fairly and comply with all applicable antitrust and related laws, rules, and regulations; and
- Suppliers will not transact securities while in possession of material non-public information or otherwise violate insider trading standards.

**Procurement by Suppliers**

Suppliers will require all parties from whom they source goods and services on behalf of Arcosa to adhere to the requirements of this Supplier Code of Conduct.

**Reporting Violations**

This Supplier Code of Conduct covers a variety of matters that may be encountered in the ordinary course of business. However, the Supplier Code of Conduct cannot address every possible law, regulation, policy, or ethical dilemma.

Questionable behavior or suspected violations of this Supplier Code of Conduct can be anonymously reported by contacting the Arcosa Integrity HelpLine at (844) 855-9957, or the Arcosa Integrity HelpSite at <https://www.ArcosaIntegrity.com>.

Arcosa seeks to foster an environment where we can confidently and without fear of retaliation report or seek guidance regarding matters related to integrity or compliance. Arcosa will not tolerate retaliation against any individual who in good faith has sought out advice or has reported questionable behavior or a possible violation.

Arcosa promptly and thoroughly investigates all reports. When doing so, Arcosa will maintain confidentiality to the fullest extent possible, consistent with conducting a proper investigation and within the limits allowed by law.

Arcosa employees who violate the Arcosa Code of Conduct are subject to disciplinary action, up to and including termination. Suppliers who violate the Arcosa Code of Conduct or the Supplier Code of Conduct are subject to appropriate action including, but not limited to, termination by Arcosa of the Supplier's work assignment, other business arrangements, or agreements.