



Code of Ethical Business Conduct

Safer and Better Operations





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A Message from Our Chairman and Chief Executive Officer

We aspire to operate as a world-class organization in every respect of our business. The trust we build through our words and deeds allows us to always pursue the highest standards of ethical business behavior. This shared commitment to integrity and honesty is fundamental to our core values and requires candor, cooperation and openness in all of our business interactions. Such behavior earns the trust and respect of our colleagues, customers, suppliers, investors and neighbors within the communities where we live and work. By holding ourselves to these high standards, we lay a foundation for not only the Company's success, but our own as well.

Our *Code of Ethical Business Conduct* will guide you in recognizing and responding to situations that require ethical decision-making. As an organization, we have worked tirelessly to build our culture and strengthen our reputation for honesty and integrity. A commitment to performing our work responsibilities with honesty and integrity is a nonnegotiable expectation; they drive our success. I am counting on each of you to understand your responsibilities under our *Code of Ethical Business Conduct*, encourage ethical conduct and compliance with law, and raise any and all concerns with confidence, knowing that you are free to do so without fear of retaliation.

Thank you for your continued commitment to this important undertaking.



Ward Nye | Chairman and CEO
Martin Marietta



Introduction

Our ONE Culture and Mission, Vision and Values

In a world that's focused on the power of *many*, we believe in the power of **ONE** – the magic of bringing together our unique perspectives, experiences and talents to evolve a shared vision and future. Powered by a **legacy** of safety and doing the right thing, Martin Marietta teams are anchored in the **truth** and fortified by a collective **heart** of genuine, hardworking people who take care of each other.

Legacy

You have the opportunity to build a legacy while helping us continue ours. Together, we can make a lasting difference.

Truth

We are Martin Marietta. We're authentic and genuine. We value honesty.

Heart

At the end of the day, everyone leaves work and goes home safely to their family.

On our **ONE** journey to build the unique dreams of our customers and communities and, along that path, help one another so that each of us and our families may lead full, satisfying lives, our culture for integrity in everything we do is critical. We have a duty to conduct our business affairs within both the letter and the spirit of the law. There are no exceptions. We are dedicated to providing a work environment where employees are free to express concerns or report violations without fear of retaliation.

Our **Mission, Vision and Values** set the stage for this culture of integrity on our mission to be a true world-class organization, not just in our industry, but in all industries. Our **mission statement** explains our Company's reason for existence. It describes who we are and what we do. It supports our vision and communicates our purpose and direction to all of our stakeholders.

*As a leading provider of natural resource-based building materials, Martin Marietta provides the **foundation** upon which our **communities** improve and grow.*

Our **vision statement** describes our Company as it would appear in a future state. It drives our Company's decisions and goals and challenges and inspires our employees.

*Our goal is to build a **world-class organization** committed to the long-term success of our employees, communities and other stakeholders.*

Our **values** describe our beliefs and behaviors. They guide our decision-making and establish standards upon which we can assess our actions. They create a moral compass in our business dealings for both the Company and you. They support the vision.



SAFETY

We are uncompromising in our commitment to the **safety and health** of our people and the community.



INTEGRITY

We will do the right thing by adhering to our core values and **ethical business principles**.



EXCELLENCE

We are committed to being a role model through responsible **innovation and continuous improvement**, fully enabled by placing diverse thought, talent and leadership at the center.



COMMUNITY

Our strength and success is derived from our people and the respectful **relationships** they build within our diverse neighborhoods and communities.



STEWARDSHIP

Our responsibility is to **make the world better** today and for future generations. Together we're working to leave an impact that lasts well beyond tomorrow.

Our Ethics Office, Ethics Hotline and Commitment to Business Ethics

Ethics is about doing the right thing. We expect employees to do the right thing every day. We believe in the highest standards of ethical conduct and we support these beliefs with programs and policies designed to guide employees on ethical matters. Our **Code of Ethical Business Conduct** (the "Code") contains these policies and guides our business conduct.

Martin Marietta promptly investigates all reports alleging violations of laws, regulations, policies, or procedures that occur in the workplace, in off-premises situations with a relationship to the workplace, or that affect the workplace.

Employee reports will be handled as confidentially as possible. No employee will experience retaliation for making a report in good faith. In addition, if you report a suspected violation to the Ethics Hotline, you will be given anonymity if you so request. However, if a full investigation cannot occur because of anonymity, the Company will attempt to contact you regarding limited disclosure of your identity.

The **Corporate Ethics Office** is part of the executive office of Martin Marietta

At Martin Marietta, we believe **acting with integrity is the right thing to do to make our business stronger**. Our **Code of Ethical Business Conduct** is the foundation of our commitment to ethical excellence.

and reports to the Executive Vice President and General Counsel, who is the Chief Ethics Officer and reports ethics matters to the Chief Executive Officer of Martin Marietta and the Ethics, Environment, Safety and Health Committee of our Board of Directors, as well as the Board of Directors and other Committees of the Board depending on the matter.

The Ethics Office investigations are conducted in a manner that complies with all applicable federal, state, and local laws, orders, rules, regulations, and ordinances. Investigators are assigned complaints by the Ethics Office, and they are instructed to execute their responsibilities with integrity and fairness. The primary responsibility of an investigator is to uncover facts and evidence to substantiate or refute allegations and/or to fully comprehend an incident. Investigators must act with integrity in the methods used in obtaining information, documentation, and evidence.

All investigations of ethics-related matters alleging possible misconduct or wrongdoing must be assigned by the Ethics Office, regardless of to whom the violation is reported. All investigations of suspicions of fraud must be reported to the Ethics Office as soon as the issue is discovered or reported and before any investigation is undertaken. The investigation must comply with the Ethics Office Protocols.

No personnel from Finance, HR or Production/ Operations should formally or informally investigate any potential fraud without first notifying and waiting for instruction from the Ethics Office.

To report a violation or apparent violation of the Code, we strongly encourage you to work with your supervisors in making such reports or, alternatively, report any concerns to Human Resources or the Legal Department. In addition, you have the right to report violations directly to the Corporate Ethics Office directly or through the **Ethics Hotline**. Violations may be reported anonymously through the Ethics Hotline. Prompt reporting of violations is considered to be in the best interest of everyone.

Our Ethics Hotline calls are answered by an independent third party with expertise in handling

hotline calls. An interview specialist will ask you questions and send a report to the Ethics Office for a confidential review. The report will be promptly investigated and, if warranted, remedial action will be taken.

The toll-free number for the **Ethics Hotline is 800-209-4508** and is available 24 hours a day, 7 days a week in numerous languages. Employees may also visit martinmarietta.alertline.com or write to the Ethics Office, PO Box 30013, Raleigh, NC 27622, to make a report. Remember there is never a penalty for contacting the Ethics Office in good faith. People in positions of authority cannot stop you; if they try, they are subject to disciplinary action.

What to Expect When Calling Our Ethics Hotline

- Your concern will be treated seriously, fairly and timely.
- You will be treated with respect.
- You need not identify yourself.
- Martin Marietta takes its obligations very seriously and will take appropriate action in response to violations of this Code, even if these actions are not always visible to you.

Ethics Hotline Contact Information

Martin Marietta Ethics Hotline

Available 24 hours a day, 7 days a week

martinmarietta.alertline.com

Toll-free number: 800-209-4508

Martin Marietta will not tolerate retaliation against employees who in good faith raise concerns, make an ethics-related inquiry, participate in an investigation or report misconduct to any source in good faith.

Our *Code of Ethical Business Conduct*, as well as the Ethics Office policies and other policies and procedures of the Company, are reviewed from time to time and updated whenever associated regulations change or as otherwise appropriate.

Special Responsibilities for Managers

We expect our managers and supervisors to demonstrate a strong commitment to our values and our Code. If you are a manager or supervisor, you should:

- Lead by example and act in an ethical manner in accordance with our values.
- Make sure your employees know and understand this Code and other Company policies.
- Create an environment that encourages asking questions and raising concerns.
- Promptly escalate reports from employees to the Ethics Office.
- Prevent retaliation against those who speak up.

Who is Responsible for Complying with Our Code of Ethical Business Conduct?

Whatever your role is at Martin Marietta, the principles of our Code should be at the core of every business decision you make. Our Code applies to everyone in our Company, from our offices and plants to the boardroom.



Ethical Decision-Making

We are all responsible for upholding the values, morals and ethics of our Company. Sometimes it is clear if there has been a Code violation, other times we may not be as sure. If you have difficulty deciding if something is, or is not, a violation of the Code, ask yourself the questions in the box to the left.

Ethical Decision-Making Framework

- Is it legal?
- Is it consistent with our Code and policies?
- Is it consistent with Martin Marietta values?
- Is it consistent with my core values?
- What would I tell a loved one to do?
- How would I feel if it were made public?

You have resources to help you either make the right decision or to report a concern. Your manager or other managers are good resources. Your Human Resources representative is always there to help and guide you. You can also contact the Ethics Hotline to seek guidance or report a concern.

Retaliation against an individual who in good faith raises a concern or participates in an investigation will not be tolerated. If you feel you have been retaliated against, contact your Human Resources representative or our Ethics Hotline.

The reputation and success of our Company depend on all of us. The Code and other resources are there to support you; however, acting ethically must begin with you.

Compliance and Enforcement

Failure to comply with the standards contained in this Code will result in disciplinary action that may include, among other things, termination, referral for criminal prosecution, and reimbursement to Martin Marietta for any losses or damages resulting from the violation. As with all matters involving investigations of violations and discipline, principles of fairness and dignity will be applied. Any employee charged with a violation of this Code will be afforded an opportunity to explain his or her actions before disciplinary action is taken. Disciplinary actions will be taken:

- Against employees who authorize or participate directly in actions that are a violation of this Code.
- Against any employee who may have deliberately failed to report a violation or deliberately withheld relevant and material information concerning a violation of this Code.
- Against the violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate supervision or a lack of diligence.
- Against any employee who retaliates, directly or indirectly, or encourages others to do so, against someone who reports a violation of this Code.

Investigating Allegations of Misconduct

The Ethics Office reviews all alleged code violations and investigates all claims by:



Acting objectively in determining facts through interviews and review of documents



Reviewing appropriate documents and contacting employees and others who may have knowledge about alleged incidents



Recommending corrective actions and/or disciplinary measures, as appropriate



What We Stand For / What We Prohibit

What We Stand For

Integrity

We believe in doing the right thing everywhere we do business

Ethical Leadership

Our values inform our business decisions so that we maintain the trust of our employees, business partners, and communities; and we uphold our reputation as an ethical, legal, and respected company

Respect

We value individual differences, diversity of thought, and respect for others as an essential element of positive and productive business relationships

Responsibility

We are responsible for meeting our commitments and transparent in the ways we deliver results for our customers and stakeholders

Speaking Up

We have the courage to ask questions and raise concerns about any situation, condition, or action that appears inconsistent with our **Code of Ethical Business Conduct**, Company policy, or applicable law, knowing that our voices will be heard without retaliation

What We Prohibit

Dishonesty

We don't mislead our customers, suppliers, distributors, or each other; we do not falsify or misrepresent information in or about our books and records, or engage in unfair competition

Illegal Activity

We don't violate the law and don't support others in violating the law either. This includes violating laws related to antitrust, bribery, corruption, environmental standards, human rights, privacy, insider trading, employment, global trade, and other laws that apply to our business

Misuse and Theft of Assets

We don't misuse or steal Martin Marietta assets or confidential information, or those of our customers or vendors, disclose confidential information entrusted to us without proper authorization, or put the security of our assets in jeopardy

Conflicts of Interest

We avoid situations that interfere or appear to interfere with our ability to act in Martin Marietta's best interests

Retaliation

We don't harass, bully, intimidate, engage in threats or acts of violence toward others, or retaliate against anyone who speaks up in good faith or participates in an investigation

Demonstrating Our Integrity

Upholding the Code

Maintaining the trust of our employees, customers, stakeholders, and communities is essential to ensuring sustainable success. Our Code reflects our commitment to ethical business practices, which often go beyond what the law requires. It applies to our employees, Board of Directors, consultants, agents, contract and temporary laborers and others representing or acting for our Company. In addition, we expect our suppliers, vendors and others with which Martin Marietta does business to follow the same high standards of business conduct described in our *Code of Ethical Business Conduct*.

We follow both the letter and the spirit of the laws and regulations that govern our business and the countries in which we operate. In this regard, we do not take any illegal or unethical action, even if it appears to benefit the Company or is directed by a higher authority in the organization.

Any waiver of the Code for executive officers or members of the Board of Directors may be made only by the Board or a Board committee and must be promptly disclosed to our shareholders on our website.

Violations of the Code or failure to cooperate in investigations regarding possible violations may result in disciplinary action up to and including termination. Leaders are accountable for actions that could influence employees to violate our Code.



Application of the Code

This Code sets forth the key guiding principles of business conduct that we follow and expect our employees to follow. This Code, however, does not capture all laws, rules, regulations and Company policies and procedures that may be applicable to the Company and our employees and does not cover every issue that may arise or every situation in which ethical decisions must be made. Therefore, please refer to the Company's other guidelines and policies and procedures for additional information on the topics addressed in this Code as well as other matters not addressed in this Code.

Speaking Up and Voicing Concerns

It takes courage to speak up when you think that something is wrong, but that kind of courage is part of our culture, and your voice will be heard without retaliation. You do not have to have all the answers and it is okay to ask for help in ethical situations.

As you read the Code, please keep in mind that none of the provisions are intended, nor will be interpreted, to interfere with, restrain or prevent employee communications regarding wages, hours or other terms and conditions of employment. Employees have the right to engage in, or refrain from, such activities.

Duty to Report

Each employee, officer, and director is responsible for promptly bringing to the Company's attention any circumstances which he or she believes in good faith may constitute a violation of applicable law, regulations, Company policy or this Code. The Company considers that failure to discharge this responsibility may be as serious as the violation itself. Employees, officers and directors are encouraged and required to raise any concern about risks to the Company before these risks become actual problems.

We have established processes for the open, confidential, or anonymous submission by employees, officers, directors and other persons of information about possible violations of law, regulations, Company policy, or this Code, including any concerns or complaints regarding accounting, financial reporting, internal accounting controls or auditing matters for consideration by the Audit Committee of the Board of Directors. You may contact your supervisor, Human Resources manager or other member of management to report an incident. You may also contact the Company's **Ethics Hotline** by calling **800-209-4508** (a toll-free service that is available 24 hours a day, 365 days of the year), visiting martinmarietta.alertline.com, or writing the Ethics Office, PO Box 30013, Raleigh, NC 27622. Although it may be impossible in certain circumstances to keep a person's identity confidential, we will strive to take every action practicable to maintain confidentiality for any person reporting a violation.

No Retaliation

We do not tolerate or allow retaliation against anyone who, in good faith, makes an ethics-related inquiry, participates in an investigation, or reports misconduct.

If someone tries to stop you from reporting an issue, that person can be subject to disciplinary action up to and including termination. Retaliation can be subtle, such as changes in work assignments or occurring in casual work-related interactions (e.g., coffee or lunch breaks). We expect all employees to report any violations of this Code, including any incidents of retaliation.

Contacting the Ethics Office in “good faith” does not mean you have to be right, but it does mean you believe the information provided is truthful.

Participation in Training

Training prepares us to recognize and effectively react to situations requiring ethical decision making. Training also addresses the consequences of compliance violations for both Martin Marietta and individual employees. Training helps improve our understanding of topics in this Code and their application in practice. The training we provide helps us learn to live our business values through discussion of real-life scenarios based on workplace violations.

Every employee is expected to complete all required training by the due date, including compliance training and annual ethics awareness training.



Anti-Corruption and Anti-Bribery

No employee, officer, manager or director will make, or cause to be made, any improper payment or offer any improper inducement to any actual or potential customer or to an intermediary as a bribe, kickback or similar payment that is directly or indirectly for the benefit of any individual (including any government official), company or organization in any country, and which is designed, directly or indirectly, to secure favored treatment for the Company.

Under laws in a number of jurisdictions, it is a crime, punishable by imprisonment and substantial fines, to make payments or offer inducements of this kind to government officials, including under the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other international anti-corruption laws. The Company will adhere to the letter and spirit of such laws, and its policy is broader in scope and is intended to apply regardless of whether the payment, inducement, or use is lawful under the laws of a particular country, or whether the allegations involve individuals employed directly by Martin Marietta or those with whom we partner, such as agents and suppliers. It is important that any questions about this policy be discussed with the Company's Legal Department before any payment or inducement is made that may be viewed as a possible violation of this policy.

In some cases, payments to facilitate routine transactions that are regular practice and required by law may be acceptable. Before these "facilitation payments" are made or agreed upon, employees must consult with the Company's Legal Department to ensure that the payments are permissible.



Antitrust Laws

Employees must comply with all applicable antitrust laws. The United States antitrust laws prohibit the following kinds of activities that are considered to be in “restraint of trade” that improperly reduce competition: agreements or understandings among competitors to fix or control prices or wages, to boycott specified suppliers or customers, to allocate products, territories, or markets, or to limit the production or sale of products or product lines. Employees should never engage in discussions of such matters with representatives of other companies.

Employees should report to the Company’s Legal Department any instance in which such discussions are initiated by other companies.

All employees who regularly deal with customers or competitors must be familiar with relevant antitrust law and related Company policy by participating in antitrust education and training provided or approved by the Company. U.S. antitrust laws also apply to international operations and transactions related to imports to, or exports from, the United States. Moreover, the international activities of Martin Marietta could be subject to antitrust laws of foreign nations.

Mandatory antitrust training and stand-alone Antitrust Policies are provided to employees who are required to participate in the training and follow the Company’s policies. Because of the complexity of antitrust laws, it is imperative that advice be sought on any questions regarding this subject from the Company’s Legal Department. The criminal penalties imposed by courts related to violations of the antitrust laws could be severe in terms of both imprisonment and fines, and they are imposed on both employees and employers.



Anti-Violence in the Workplace

We have a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that causes another individual to feel threatened or unsafe, including verbal assaults, threats, intimidation, aggression or hazing.

We prohibit the possession of weapons in the workplace. This prohibition extends to Company parking lots as well as our facilities, to the full extent permitted by state or local law. If state law allows, weapons in a personal vehicle must be locked while on Company property.

Our zero-tolerance policy for workplace violence applies to behavior of all of our employees as well as third parties, including visitors, on Company premises.

You have an obligation to speak up and report unusual or concerning behavior, threats or potential violence immediately to location management.



Complete and Accurate Books and Records

Applicable laws and regulations establish the following requirements with regard to record-keeping and communications:

- Martin Marietta's financial statements and all books and records on which they are based must timely and accurately reflect all transactions of Martin Marietta.
- All disbursements of funds and all receipts must be properly and promptly recorded.
- No undisclosed or unrecorded fund may be established for any purpose.
- No known false or artificial statements or entries may be made for any purpose in the books and records of Martin Marietta or in any internal or external correspondence, memoranda, or communication of any type, including telephone or wire communications.
- No employee will take any action to fraudulently influence, coerce, manipulate or mislead any independent auditor of Martin Marietta's financial statements for the purpose of rendering the financial statements materially misleading.
- Misapplication or improper use of corporate or customers' funds or property, or false entry to records by employees or others, may result in disciplinary action, up to and including termination.
- Records containing personal data about employees, officers and directors are confidential. They are to be carefully safeguarded and kept current, relevant and accurate. They should be disclosed only to authorized personnel and in accordance with lawful process.
- Financial information can be made available outside the Company only with proper prior authorization.



What is Fraud?

- Submitting false expense reports
- Misappropriating Company property or assets
- Forging or altering checks
- Not recording revenue
- Not accurately and timely reporting transactions
- Improperly changing Company records or financial statements
- Fraud is **not** a mistake

Fraud is not only unethical, it is also illegal.

Any violation of these rules must be reported to the Company's Legal Department or **Ethics Hotline at 800-209-4508**.

As with all other provisions in this Code, this provision is not intended, nor will be interpreted, to interfere with, restrain or prevent employee communications regarding wages, hours or other terms and conditions of employment.

It is the Company's policy to provide full, fair, accurate, timely and understandable disclosure in all documents required to be filed with, or submitted to, the Securities and Exchange Commission and all other public communications. Our employees must act in a manner that supports this policy, including ensuring that internal reports are accurate and complete, and that they are in compliance with our systems of internal controls and disclosure controls and procedures.

Computer Use

The computer systems of the Company (including, but not limited to, desktop and laptop computer equipment; mobile, phone or personal devices; hard drives; printers; peripherals; software and operating systems; and network and/or Internet-related accounts providing electronic mail, access to the Internet, newsgroup access, and/or file-transfer capabilities) are the property of the Company and are to be used for the business purposes of the Company. Like any record, the information in any computer-related file is Company property and should be treated and protected like any other piece of Company property or Company record.

You should not have an expectation of privacy regarding the use of our computer systems. Any information you create, share or download onto Company systems belongs to the Company. We reserve the right to monitor, record, disclose, audit and delete without prior notice the nature and content of an employee's activity using our Company's email, phone, voicemail, internet and other systems, to the extent permitted by state or local law.

The computer or communication systems of the Company should not be used to commit any illegal act or to download, transmit or receive sexually explicit or other offensive material. In addition, employees are prohibited from providing confidential information about the Company, its customers, suppliers, directors, employees or its securities to the public. **As with all other provisions in this Code, this provision is not intended, nor will be interpreted, to interfere with, restrain or prevent employee communications regarding wages, hours or other terms and conditions of employment.**

In addition, the Company has the right to inspect the contents on all Company owned or leased computer equipment or other electronic devices or any information transmitted through Company servers. Any activity that violates applicable law, the Code, or Company policy may result in disciplinary action, including discharge and/or disclosure to appropriate law enforcement officials.

Any software utilized by the Company or our employees must be used in accordance with the terms of any applicable software license or agreement. In general, the only software that should be loaded on your computer or other devices is that which the Company has approved and purchased. Illegal duplication or use of software can subject both the Company and you to significant fines (civil and criminal) and legal action.

Confidentiality

All directors, officers and employees of Martin Marietta should maintain the confidentiality of non-public information entrusted to them by Martin Marietta, its business partners, suppliers, customers or others related to Martin Marietta's business. Such information must not be disclosed to others, except when disclosure is authorized by Martin Marietta or legally mandated.

Confidential information includes all non-public information that might be of use to competitors or harmful to Martin Marietta, or its employees or customers, if disclosed. **As with all other provisions in this Code, this provision is not intended, nor will it be interpreted, to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment.**

We respect the privacy of our employees, customers and suppliers. You are responsible for complying with relevant data privacy laws when accessing the personal data of others.

Q: I have just joined the Company as a new employee, and my previous employer is one of the Company's biggest competitors. May I share some important marketing information I developed while at my former employer?

A: **No. It is not ethical or a good business practice to share confidential information with your new employer. You are obligated to protect your past employer's confidential information just as the Company's employees are obligated to protect our confidential information should they leave the Company.**

Conflicts of Interest

You have a duty to avoid financial, business or other relationships that may be opposed to the interests of Martin Marietta or may cause a conflict with the performance of employees' duties. You should conduct yourself in a manner that avoids even the appearance of conflict between personal interests and those of Martin Marietta. Activities and relationships of employee family members or other closely affiliated persons also can create conflicts of interest.

Keep in mind that not all potential conflicts between an employee's interests and the Company's best interests are harmful or prohibited. Some conflicts of interest are permissible if they are disclosed and approved. If a relationship poses a conflict that you are finding difficult to weigh, consult with the Ethics Office.

A conflict of interest situation **may** arise in many ways. Examples include the following activities of employees or their immediate family members that should be discussed with a supervisor, Human Resources, or the Legal Department:

- Employment by a competitor, regardless of the nature of the employment.
- Acceptance of gifts, payments or services from those seeking to do business with Martin Marietta.
- Placement of business with a firm owned or controlled by you or your family, or failing to disclose that you are closely related to or have

a close personal relationship with someone (such as a vendor, customer or family member) who is seeking a financial relationship with Martin Marietta.

- Ownership of, or substantial interest in, a company which is a competitor, supplier or customer.
- Acting as a consultant, employee, officer, manager, director or partner to a Martin Marietta competitor, customer or supplier.
- Acting as a broker, finder, or intermediary for the benefit of a third party in a transaction involving Martin Marietta or its interests.
- Using information you learn at the Company for your own personal gain, to benefit a family member, or to benefit another company for which you serve as an officer, director, or in which you have an economic interest.

Apparent conflicts of interest can easily arise. If you feel that a conflict situation may exist, actual or potential, you should report all pertinent details in writing to your supervisor. The supervisor will be responsible for referring the matter to the Ethics Office.

Remember, having a conflict of interest is typically not a Code violation, but failing to disclose it is. Disclosing the conflict allows the Company to advise you on how to best avoid the conflict and what action you need to take, if any.


Corporate Opportunities

While you work for Martin Marietta, you are expected to act in Martin Marietta's best interests. This means not taking personal advantage of opportunities you learn about in the course of your job.

For instance:

- If you learn about a good opportunity for Martin Marietta, you are expected to share it with Martin Marietta, rather than taking personal advantage of the opportunity on your own.
- You should avoid using Company property, information, or your position with Martin Marietta to benefit yourself, your family, or your close personal relationship – financially or in any other way.
- Do not start or get involved with an outside business that competes with Martin Marietta while you are still working here.

If you would like to pursue an opportunity that you learned about while working at Martin Marietta, you must first bring it to Martin Marietta for consideration. You may proceed only if you receive written approval from your supervisor or our Ethics Office.



A **"corporate opportunity"** is anything you learn about in the course of your job that might result in a personal business benefit. This could be a personal sales lead, a proposed partnership, an investment or any other transaction.

Entertainment, Gifts and Payments

The sales of Martin Marietta products and services should always be free from even the inference or perception that favorable treatment was sought, received or given on the basis of the furnishing or receipt of gifts, entertainment, favors, hospitality or other gratuities. Similarly, purchase of supplies, materials, and services from vendors, suppliers, and subcontractors must be accomplished in a manner that preserves the integrity of a procurement process based on a balance of price, quality, and performance. Reported information should be accurate when made and disclose all pertinent information in a way that is not misleading.

We specifically prohibit offering, giving, soliciting or receiving any form of bribe or kickback. These are criminal acts.

The following guidelines should be observed in relations with customers and supplier personnel.

What is a “Kickback” or “Pay to Play”?

A **kickback** or **pay to play** is a form of corruption where the employee gives preferential treatment to a third party in exchange for a payment, portion of sales or profits improperly given, rebated or otherwise returned to the employee in exchange for making the deal.

General

All approved expenditures for meals, refreshments, entertainment and gifts must be fully documented and recorded on the books of Martin Marietta in strict accordance with established policies and procedures. Our policy on expenditures, as it is updated from time to time, must be followed. Our policy currently requires

that expenditures must generally be paid for using the Martin Marietta-provided payment card and evidence of the nature of the expense and attendees must be documented on the expense report submitted each month.

Company personnel involved in procurement of goods and services must comply with the **Procurement Department Guidance for Acceptable Practices with Suppliers**.

You should report to your supervisor or the Ethics Office any instance in which you are offered money, gifts or anything else of value by a supplier or prospective supplier to Martin Marietta.

Relations with Non-Government Personnel

Furnishing meals, refreshments and entertainment in conjunction with business discussions with non-government personnel is a commonly accepted practice. We permit our employees to engage in this practice.

No employee or director will directly or indirectly accept or offer payments, gifts, entertainment or other gratuities (regardless of size or amount) that would have the effect or appearance of influencing the judgment of the recipient in the performance of his or her duties. Gifts of cash or gift cards are prohibited. It is not inappropriate under this policy to be the recipient of, or to offer, common courtesies; sales promotional items of small value; occasional meals; reasonable entertainment, recreation or tickets; or other items appropriate to a business relationship, so long as it is appropriate as to time and place, can withstand public scrutiny, does not influence or give the appearance of influencing the business judgment of the recipient, is within the bounds of moderation and common sense, and is either inexpensive or approved by a senior corporate officer or division president.

Employees who make and supervisors who approve expenditures for meals, refreshments, or entertainment must use discretion and care to ensure that such expenditures are in the proper course of business and could not reasonably be construed as bribes or improper inducements.

Relations with Government Employees

Federal, state and local government departments and agencies are governed by laws and regulations concerning acceptance by their employees of entertainment, meals, gifts, gratuities and other things of value from firms and persons with whom those departments and agencies do business or over whom they have regulatory authority.

It is the general policy of Martin Marietta to prohibit our employees from giving or offering to give any of these items to government employees. There are, however, permissible exceptions within these laws and regulations such as distributing token business mementos and providing nominal refreshments during the conduct of business discussions. Since these exceptions are narrowly construed and subject to change or deletion, any question concerning them should be referred to the Company's Legal Department.

Martin Marietta employees may not make loans, guarantee loans, make payments or give gifts of any value to federal, state or local government employees.

Martin Marietta employees may entertain socially any relatives or friends employed by government agencies. It should be clear, however,

Appropriate Gifts and Entertainment...

- Is a normal, infrequent business courtesy to maintain good business relations
- Is not cash or more than modest value
- Does not call recipient's objectivity into question
- Creates no perception of undue influence
- Does not obligate you or Martin Marietta to the gift giver or other party
- Would not embarrass you or Martin Marietta if the public became aware of it
- Is not paid to a government employee

that the entertainment is not related to the business of Martin Marietta. No expenditure for such social entertainment is reimbursable by Martin Marietta to the employee.

Procurement Department Personnel

Maintaining the highest standards of integrity in our procurement processes, and in bidding or negotiating contracts, is essential to performing on current and future contracts, products and services. Special guidelines for acceptable practices with suppliers, as revised from time to time, must be followed by procurement personnel due to the special positions they have with regard to suppliers. For more information about this topic, see **Procurement Department Guidance for Acceptable Practices with Suppliers**.

Human Resources

We will comply with the letter and spirit of applicable laws concerning equal employment opportunities and will maintain a work environment free from discrimination based upon race, color, ethnicity, religion, national origin, sex, age, disability, sexual orientation, gender identity, veteran status, marital status, genetic information, or any unlawful factor. Certain states and cities have additional categories protected from discrimination, and we comply with those rules.

Our diverse, engaged and dedicated workforce is our greatest asset, and the continued well-being of our employees is critically important for our success. Engagement happens when we bring together exceptional and diverse talent with different backgrounds, genders, ethnicities, qualifications, perspectives, experiences, voices and skills to ensure that we will consistently develop the best ideas and advance our world-class ambition. Enabled by an inclusive environment where each person feels like they belong, are valued and can speak up, engagement allows us to forge stronger, more productive connections. We are committed to providing all employees with the programs, resources, support and opportunities necessary to grow. We strive to create safe, healthy, diverse and highly engaging workplaces and hope that our decisions in this area will extend far beyond our business, positively affecting people and communities for generations to come. This means embracing our uniqueness by treating everyone with dignity and respect, looking out for each other, speaking up, showing up and always doing what is right. Our strength is derived from our people, and championing this strength empowers each of us to make a difference in our pursuit of excellence.

Inside Information and Securities Laws

“Material non-public information,” also known as inside information, is any information about a company that has not reached the general market place and would be important to investors. Examples include financial results or forecasts, major management changes, proposed mergers or acquisitions, and significant contracts.

Martin Marietta is required by the Securities and Exchange Commission and the New York Stock Exchange to make prompt public disclosure of “material information” regarding Martin Marietta. Employees, officers, consultants and directors must comply with Martin Marietta’s **Insider Trading Policy**.

There will be occasions when you know important information affecting Martin Marietta’s activities that has not been publicly released. In such cases, you must hold the information in the strictest confidence, which includes not communicating it to family members, friends or other employees that do not need to know. It is a violation of federal law to purchase or sell a company’s securities using what is known as “material non-public (or inside) information.” This also applies to officers, consultants and directors. Trading on inside information can give rise to substantial civil and criminal penalties, including fines and imprisonment. These penalties may apply to those individual employees, officers, agents, or directors violating laws as well as to the Company.

Employees, officers, consultants and directors may not buy or sell Martin Marietta securities on the basis of “material non-public (or inside) information” nor provide information to others for that purpose. Further, employees may not buy or sell securities in any other company about which they have material information obtained in the performance of their duties.

For more information about this topic, please ask your manager, the Corporate Secretary, or refer to the **Insider Trading Policy**.

“Material non-public information,” also known as **inside information**, is any information about a company that has not reached the general marketplace and would be important to investors. Examples include financial results or forecasts, major management changes, proposed mergers or acquisitions, and significant contracts.

Political Contributions and Lobbying

Martin Marietta encourages you to become involved in civic affairs and to participate in political activities. In this regard, Martin Marietta acknowledges and respects your right to support any candidate or political party through personal contributions. Employees must recognize, however, that their involvement and participation must be on an individual basis, on their own time, and at their own expense.

The Company is a member of, and encourages you to participate in, national and state trade associations for a variety of reasons, including monitoring of industry policies, current legislation and trends, building industry skills and civic participation. Our participation in trade associations, including membership on a trade association board, does not mean that we agree with every position a trade association takes on an issue. In fact, from time to time our corporate positions may differ from those of the trade association of which we are members.

Employees are not reimbursed by the Company for personal political contributions, and employee compensation will not be increased or otherwise adjusted to reflect political contributions made.

No Martin Marietta funds or assets, including the work time of any employee, may be contributed or loaned, or made available to any political party, campaign or candidate other than through a Company-approved political contributions committee (PCC). Federal and many state laws prohibit corporate contributions to political parties or candidates. Any contribution on behalf of the Company to a state or local campaign

requires the prior approval of the Company's PCC or Legal Department. This policy applies to corporate contributions to political parties or candidates.

Employees desiring to request a political or charitable contribution from the Company must comply with the **Martin Marietta Political and Advocacy Activities Policies and Procedures**, submit a completed *Political Contributions and Lobbying Request* form and comply with those procedures, as may be adopted from time to time.

Preservation of Corporate Assets

Every employee is charged with the duty to preserve any of Martin Marietta's assets, its property, plants and equipment, and equipment that has been furnished by our customers and suppliers. You are personally accountable for Company funds or assets over which you have control.

All employees, officers, managers and directors should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability and therefore the Company's assets should be used for legitimate business purposes. If you are spending Company money, or personal money that will be reimbursed, you should always be sure the Company receives good value in return. If you are approving or certifying the correctness of a voucher or bill, you should have reasonable knowledge that the purchases and amounts are proper. If you are responsible for the handling of Company assets, as well as associated records and materials, you are accountable for their safekeeping. In addition to cash, property and equipment, assets include checks and items such as Company credit cards.

"Fraud" is the act or intent to cheat, trick, steal, deceive or lie.

Fraud is both dishonest and, in many cases, criminal. Intentional acts of fraud are subject to strict disciplinary action, including dismissal and possible civil and/or criminal action. It is important to understand what fraud can entail, so you can recognize it and avoid mistakes. Some examples include submitting false expense reports, forging or altering checks, misappropriating assets or misusing Company property, unauthorized handling or reporting of transactions, or making an entry on Company records or financial statements that is not accurate and in accordance with proper accounting standards.

Any fraudulent activity that violates applicable law or Company policy may result in disciplinary action, including discharge and/or disclosure to appropriate law enforcement officials.

Respect in the Workplace

Martin Marietta will not tolerate unlawful workplace discrimination or harassment. We are committed to providing a professional work environment for our employees that is free of discrimination and harassment.

Conduct that is intended as an innocent joke or harmless flirting may still constitute harassment.

No Discrimination

We do not discriminate against employees or applicants on the basis of characteristics protected by applicable law or Martin Marietta policy such as race, color, religion, sex, age, natural origin, citizenship status, disability, sexual orientation, gender identity, veteran status, genetic information or any other protected status under federal, state, or local laws. We follow all policies and laws that relate to recruitment, selection, and other aspects of employment such as promotion, demotion, transfer, layoff, termination, compensation, education, training and disciplinary action.

When the diverse talents and perspectives of all employees are fully embraced and leveraged, we power innovative solutions and unparalleled value for our customers. That won't happen if individuals are excluded simply by virtue of who they are.

Perpetuating stereotypes is a form of discrimination that can damage the culture and the performance of the Company.



No Harassment

We are committed to maintaining a work environment that is free of harassment or other abusive conduct that is unlawful. Martin Marietta prohibits verbal or physical conduct that offends, abuses, intimidates, torments, degrades or threatens another person.

Our success depends on the talent, skills and expertise of our people and our ability to function as a tightly integrated team.

Respect for Privacy

Respect for privacy generates trust among employees and customers.

We do not access personal information or personal data unless there is a legitimate business purpose and we have proper authorization. We respect the privacy and dignity of all individuals and safeguard the confidentiality of employee records and information. We only send personal information or personal data externally when it complies with the laws relating to use of approved secure e-mail and file transfer methods. Where required by law, we provide notice to employees regarding their privacy rights.

What personal data do we collect that must be protected?

We comply with all applicable laws to protect all personal data we hold, including personal data regarding our employees, directors, suppliers, contractors, customers and others. Examples of personal data include, but are not limited to, names, identification numbers, email addresses, individual phone numbers, photos, IP addresses, device ID, or location data.



Safety, Health and Environmental Regulations

We are committed to providing a safe and healthy workplace for our employees and for visitors to our premises. These commitments can only be met through the awareness and cooperation of all Martin Marietta employees. We each have a responsibility to abide by safe operating procedures by rigorously adhering to established safety procedures and practices, avoiding short cuts, and guarding our own and our fellow employees' safety.

Q: Someone told me to disable a safety device that slows down production. What should I do?

A: **Employees should never bypass, disconnect or disable any safety device or monitoring equipment. Doing so may violate the law or expose you or others to an accident or injury. Safety is an absolute commitment that should not be compromised for any reason.**

We are committed to operating in an environmentally responsible manner. It is our policy to continually strive to improve compliance with environmental laws and regulations, to place primary responsibility for compliance with environmental laws with operations management and to encourage employee involvement in implementing this policy and reporting suspected environmental problems.

In the United States and other countries in which we operate, regulatory agencies exist under federal, state or local jurisdiction to ensure compliance with laws and regulations affecting safety, health and environmental protection. It is our policy to comply with both the letter and the spirit of the laws and regulations. In keeping with this spirit, you are encouraged to report to your supervisor conditions that you perceive to be unsafe, unhealthy or hazardous to the environment. Alternatively, you may report these concerns to Human Resources or the Ethics Office.



Sales of Products and Services

We are dedicated to developing, producing and delivering

products and services of the highest quality – products and services that meet or exceed the requirements of customers. The customer has the right to expect, and we have an obligation to ensure, that products and services are delivered at a fair price. This can be accomplished only by a continuing dedication to fair business dealings and a strict adherence to all contractual obligations.

On occasion, we may sell products or services to government agencies at the federal, state or local level. In those instances, we will strictly observe the laws, rules and regulations that govern acquisition of such goods and services. We will compete fairly and ethically for all business opportunities. No Martin Marietta employee shall attempt to obtain, from any source, government information that is procurement-sensitive nor any information of a competitor in circumstances where there is reason to believe the release or receipt of such information is unauthorized. Personnel involved in negotiations of government contracts and commercial contracts shall ensure that all statements, communications and representations to customer representatives are accurate and truthful.

Sufficient care must be taken to ensure proper recording and charging of all costs to the appropriate account, regardless of the status of the budget for that account. The falsification of timecards or other cost records will not be tolerated. Every supervisor is personally responsible for assuring that the time of employees is recorded promptly and accurately. It is specifically prohibited for any employee to submit or to concur in the submission of any claims, bids, proposals, or any other documents of any kind that are false, fictitious or fraudulent. Such acts are criminal violations, which could result in criminal prosecution of Martin Marietta and the employee involved.

Q: The procedures for opening Company accounts involve several steps. Can I consolidate the authorizations required in order to save time?

A: **Key duties and responsibilities need to be divided or segregated among different people to reduce the risk of error or fraud. This should include separating the responsibilities for authorizing transactions, processing and recording them, reviewing and approving the transaction and handling any related assets. No one individual should control all key aspects of a transaction or event.**

Fair Competition

We should endeavor to deal fairly and honestly with our customers, suppliers, competitors and their employees. In this regard, we will perform all contracts in compliance with laws, specifications, requirements, and contract terms and conditions and never request, accept, use, copy or distribute any information to which Martin Marietta is not legitimately entitled. This Company has a history of succeeding through honest business practices. We do not seek competitive advantages through illegal or unethical business practices.

International Business

It is the policy of the Company that none of the Company's funds or assets shall be offered or be used to give or to provide, any gifts, gratuities, favors or entertainment, directly or indirectly, to any foreign government official or employee unless such gift, gratuity, favor or entertainment (1) is lawful under applicable law (including that of the country where the gift is offered); (2) is of nominal value or is a mere token of courtesy; (3) is of the sort which is customarily given in the country in question; and (4) is not being given to the government official or employee with unlawful intent.

Trade Guidelines

We comply with both the U.S. law and the laws of the countries where we do business, including all export and import laws and regulations that cover our products. We do not engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. Government. This is important because export and import violations, and illegal boycotts, damage the trust and transparency needed to transact legitimate and long-term business. Our customers and distributors expect fair and open competition in how we do business worldwide with our competitors, suppliers and customers.

Slavery and Human Trafficking

Slavery and human trafficking are violations of fundamental human rights. They take many forms, including servitude, forced and compulsory labor, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal gain. Martin Marietta has a zero tolerance approach to slavery and human trafficking and is committed to acting fairly, ethically and with integrity in all of its business affairs. We are committed to enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its own business or in any of its supply chains.

Under the UK Modern Slavery Act 2015, certain corporations are required to make disclosures as to the steps taken to ensure their businesses and supply chains are free from slavery and human trafficking. Consistent with that requirement, Martin Marietta is committed to ensuring transparency in its approach to tackling slavery and human trafficking. We expect the same high standards from all of our vendors, suppliers and business partners.



Sustainability and Good Corporate Citizenship

We seek to maximize the positive impacts of our products and services on the environment, the economy, community development and infrastructure resilience. In this regard, we seek to avoid and minimize any negative consequences of our business activities and decisions on the environment, society and our employees.

We are committed to operating in a manner that protects the environment, conserves natural resources and prevents pollution. These commitments ensure long-term competitiveness of our business. Our sustainability performance improves customer relationships and quality, reduces cost and risk, and drives innovation.



Third Party Inquiries

Employees should immediately refer all inquiries from investors and analysts to Investor Relations, and inquiries from media, government officials and lawyers representing third parties to a member of the Legal Department.

Media Statements

We are committed to providing accurate, clear, complete and consistent information to the public. Unless your job duties expressly state otherwise, you are not permitted to speak on behalf of Martin Marietta, either expressly or implicitly, when making any statements to third parties, including investors, analysts, media, or as a consultant or adviser, or on social media or in other forums. If you are contacted and asked to discuss Company business with members of the press, investors or market analysts, do not provide any information. Instead, you should refer them to the Investor Relations group or the Legal Department.

Social Media and Artificial Intelligence Systems

Access to social media sites, including, but not limited to, blogs, wikis, social networks, chat rooms, multi-media networks, social communities, forums, virtual worlds and other online spaces in which user-generated content is displayed or posted, such as Facebook, LinkedIn and X – formerly Twitter – (social media) and AI-based systems, that is utilized principally for business purposes, though also may be used by employees for incidental personal communications, is permissible. Any access and use by employees of the Company's servers, network and Internet connections to participate in social media or AI-based systems is subject in all respects to the Company's computer use policy.

If you post information in public forums, such as social networking sites, blogs, chat rooms or AI-based systems, you are prohibited from sharing confidential, private or proprietary information about Martin Marietta. **As with all other provisions in this Code, this provision is not intended, nor will be interpreted,**

to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment.

Artificial Intelligence

("AI") is the development of computer systems that adjust to new information and perform tasks typically requiring human cognition. Bing Chat, Google Bard, and Chat GPT are examples of web-based utilities that allow interaction with AI-based systems through a chat interface.

While all Martin Marietta employees are welcome to participate in social media, we expect everyone who participates in online commentary to understand and to follow these simple but important guidelines. The goal of these guidelines is simple: to encourage online participation in a respectful, relevant way that protects our reputation and follows the letter and spirit of the law.

Unless your job duties expressly state otherwise, you are not permitted to speak on behalf of Martin Marietta, either expressly or implicitly, when making any statements to third parties, including investors, analysts and media, or on social media or in other forums. These guidelines focus on personal use of social media when your communications relate to or identify Martin Marietta, its products, customers, employees, or business. Additional guidelines and rules may apply to employees whose job duties involve social media.

When you are online and represent yourself as an employee of Martin Marietta, you are creating perceptions about Martin Marietta, including our people, our values, and our Company. There is no room for bigotry, prejudice, misogyny, or hatred in our Company or on social media associated with the Company. If you talk about Martin Marietta on any website or any form of social media, please use a disclaimer like this one: "All opinions are my own".

When disagreeing with others' opinions, keep it appropriate and polite. If you find yourself in a situation online that looks as if it's becoming antagonistic and involves Martin Marietta, its products, customers, employees or business, do not get overly defensive: feel free to ask your Human Resources team for advice. Remember Martin Marietta's anti-discrimination/anti-harassment policies can apply to your comments even if made on social media.

Martin Marietta discourages staff in management/supervisory roles from initiating "friend" requests with employees they manage. Managers/supervisors may accept friend requests if initiated by the employee, and if the manager/supervisor does not believe it will negatively impact the work relationship. Managers/supervisors who use social media to express discriminatory bias contrary to Martin Marietta policies, even if not directed at an employee, damage their ability to act as Martin Marietta leaders.





Ethics Hotline
800-209-4508

martinmarietta.alertline.com

Call or go online to report possible wrongdoing or
to obtain clarification on ethical matters



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