

## THE MONARCH CEMENT COMPANY

## PROCEDURES CONCERNING STOCKHOLDER COMMUNICATIONS

- 1. It is the policy of The Monarch Cement Company to facilitate communications of its stockholders with the Board of Directors, any committees of the Board and individual directors.
- 2. The Board shall designate one or more of the Company's personnel to assume responsibility for receipt and processing of communications to directors. The Board has designated the Company's Chairman of the Board as the person initially responsible for receipt and processing of such communications.
- 3. Unless otherwise specified by the Board, communications to the Board or any member of the Board must be in writing and addressed to the Board or such member of the Board in care of the personnel designated by the Board pursuant to Section 2, addressed as follows:

The Board of Directors c/o Walter H. Wulf, Jr. The Monarch Cement Company P. O. Box 1000 Humboldt, Kansas 66748-0900

- 4. The personnel responsible for receiving and processing communications under these procedures will use reasonable efforts to collect all communications to the Board or any member of the Board and will act as the agent of the Board and the directors for the purpose of applying these procedures.
- 5. All communications to the Board or any member of the Board must be accompanied by the following information:
  - The name of the person submitting the communication;
  - the address, telephone number and e-mail address, if any, of the person submitting the communication; and
  - a statement of the nature of the person's interest in the Company, including the type and amount of the Company's stock that the person holds.
- 6. The personnel responsible for receiving and processing communications under these procedures should maintain an original or a copy (which may be in an electronic format) of all communications received to which these procedures apply.
- 7. The following types of communications are not appropriate for delivery to the Board or any member of the Board under these procedures:

- Communications regarding individual grievances or other interests that are
  personal to the party submitting the communication and would not reasonably be
  construed to be of concern to stockholders or other constituencies of the Company
  generally (such as employees, members of the communities in which the
  Company operates its businesses, customers and suppliers), including:
  - o Product complaints or inquiries;
  - New product suggestions;
  - o Resumes and other forms of job inquiries;
  - Sponsorship requests;
  - o Opinion survey polls;
- Communications that advocate the Company's engaging in illegal activities;
- Communications that, under community standards, contain offensive, scurrilous or abusive content; and
- Communications that have no rational relevance to the business or operations of the Company (it being understood, however, that issues of social concern arising by reason of the business and operations of the Company are not intended to be excluded under this criterion), including:
  - o Vulgar, obscene or otherwise inappropriate materials;
  - Unsolicited marketing or advertising material, mass mailings and "spam";
     and
  - o Unsolicited newsletters, newspapers, magazines, books and publications.
- 8. The personnel responsible for receiving and processing the communications under these procedures should send an acknowledgment of receipt to each person submitting a communication covered by these procedures. The acknowledgement should indicate that communications appropriate for delivery to the Board or any director under these procedures will be so delivered, but that generally it is not the practice of the Board or any director to respond individually to the communications. If a communication does not conform to the requirements of these procedures, the acknowledgement should indicate that fact and provide a brief explanation of the defects.
- 9. The personnel responsible for receiving and processing the communications under these procedures shall review each communication to determine whether, in his or her reasonable judgment:
  - the communication satisfies the procedural requirements for submission under these procedures; and
  - the substance of the communication is of a type that is appropriate for delivery to the Board or any director under the criteria set forth in Section 7 above.

- 10. If the personnel responsible for receiving and processing the communications under these procedures determine that the substance of the communication is not of a type that is appropriate for delivery to the Board or any director under these procedures, the personnel shall take the following action:
  - if the communication is in respect of an individual grievance or other interest that is personal to the party submitting the communication, the personnel should determine if there exists a standing body or department of the Company which is authorized to deal with communications of this type and, if so, should forward the communication to that body or department; otherwise, the personnel will take no further action with respect to such communication;
  - if the communication appears to advocate the Company's engaging in illegal activity, the personnel should refer the communication to counsel and, if counsel confirms this assessment, the personnel will take no further action with respect to such communication:
  - if the communication appears to contain offensive, scurrilous or abusive content, the personnel should refer the communication to a senior officer of the Company, and if the officer confirms this assessment, the personnel will take no further action with respect to such communication; and
  - if the communication appears to have no rational relevance to the business or operations of the Company, the personnel should refer the communication to a senior officer of the Company, and if the officer confirms this assessment, the personnel will take no further action with respect to such communication.
- 11. If a communication is not presented to the Board or any director because the personnel responsible for receiving and processing the communications under these procedures deems that it is not appropriate for delivery under these procedures, that communication should nonetheless be made available to any director to whom it was directed and who wishes to review it.
- 12. Communications determined to be appropriate for delivery to Board or any director shall be assembled by the responsible personnel for delivery. The assembled communications shall be delivered to the Board or any director, as applicable, on a periodic basis, generally in advance of each regularly scheduled meeting of the Board. If a communication to an individual director deals with a matter regarding the Company, the communication may be delivered to the entire Board, including the individual director. Communications that are addressed to the Company's president and chief executive officer which relate to his or her role as an officer of the Corporation, rather than to his or her role as a director, are not considered to be communications subject to these procedures.
- 13. The periodic deliveries of the assembled communications shall be organized chronologically, topically or in some other fashion designed to facilitate the review of such communications.

- 14. The personnel responsible for receiving and processing the communications under these procedures may accompany the communications delivered to the Board or any director with relevant materials or analyses, together with any recommendations of management that may be useful in the consideration of such communications.
- 15. The Company's acceptance and forwarding of a communication to the Board or any member or members of the Board does not imply that the Board or any director owes or assumes any fiduciary duty to the person submitting the communication; all such duties being only as prescribed by applicable law.
- 16. These procedures are not intended to replace or limit (i) any applicable legal requirements, including those relating to the submission of stockholder proposals for inclusion in the Company's proxy materials, or (ii) the provisions of the Company's bylaws governing the submission by stockholders of matters for consideration and vote at annual or special meetings of stockholders.
- 17. These procedures are not intended to impose upon the Board of Directors or any director an obligation to engage in interactive communication, discussion or debate with any one or more stockholders at times and any matter. The Board or any director may elect, however, to respond to stockholders submitting comments, in suitable cases and subject to applicable law, including those prohibiting the selective disclosure of material information. In general, however, matters dealing with the Company's general business operations, current and future financial results, strategic direction and similar matters are most appropriately addressed by management.
- 18. Neither the Board nor any director is required to respond to a stockholder communication and when responding will do so only in compliance with these procedures. To avoid selective disclosure, the Board or the individual director may respond to a stockholder's communication only if the communication involves information which is not material or which is already public. In such a case, the Board, as a whole, or the individual director, may respond:
  - directly, following consultation with the Chairman, as the Board or such individual director, as the case may be, determines appropriate;
  - through the Chairman, following consultation with the counsel to the Company or other advisors, as the Board or such individual director, as the case may be, determines appropriate; or
  - pursuant to such other means as the Board determines appropriate from time to time.

If the communication involves material non-public information, the Board or individual director shall not provide a response to the stockholder. The Company may, however, publicly provide information responsive to such communication if the Board determines disclosure is appropriate.

19. These procedures shall be made available on the Company's website.

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