

Directive SpeakUp & Investigations

September 1, 2023

1. Introduction and scope

INTRODUCTION

Holcim conducts business across the globe. The way Holcim conducts business is subject to the principles set out in the Code of Business Conduct (hereinafter referred to as "Code") as well as policies, directives and applicable laws and regulations. Holcim strives to adhere to the highest business and ethical standards to meet and exceed employee and stakeholder expectations.

To support transparency over its conduct and business integrity, Holcim is committed to a culture of speaking up. Any concern over known or suspected misconduct, which means any conduct relating to Holcim's business that is potentially illegal, violates the Code or other applicable policies and directives, should be reported.

SCOPE

The SpeakUp & Investigations Directive (hereinafter referred to as "Directive") aims to establish and ensure an open and reliable working environment where concerns are raised without any fear of retaliation. This Directive defines how concerns are reported and handled by setting out the main principles for speaking up and investigations, including respective roles and responsibilities.

This Directive applies to Holcim, its subsidiaries, and all joint ventures under Holcim's control (together hereinafter referred to as "Holcim" or the "Company"). For non-controlled joint ventures or other minority shareholdings, the extent to which this Directive applies must be clarified in consultation with Group SpeakUp & Investigations.

This Directive applies to all employees working at and for Holcim, including trainees, volunteers, officers, as well as members of the executive bodies (together with all others in scope of this Directive hereinafter referred to as "reporting person" or "you"). It also applies to individuals who are not employees of Holcim, such as employees of suppliers, contractors and sub-contractors of Holcim, persons having self-employed status working for and behalf of Holcim, as well as applicants and persons whose contracts of engagement have already ended or have not commenced yet. In addition, this Directive applies to customers and any other stakeholder or third party.

In particular, the following should be reported in line with this Directive:

- Breaches of applicable national and international laws and regulations, in particular with regard to corruption, bribery, fraud, data privacy, danger to health, safety and environment, conflicts of interests, discrimination, harassment, antitrust and unfair competition, tax as well as books and records requirements and money laundering.
- Breaches of any applicable Holcim policies, directives and regulations, such as the Code, the Anti-Bribery and Corruption Policy, the Fair Competition Directive, Sanctions and Export Controls Directive or others.
- Concerns regarding quality of the products and services that Holcim is providing.

Where applicable local law deviates from this Directive, it shall take precedence over this Directive to the extent that it contains mandatory rules that deviate from or surpass this Directive. Any related local adjustments of this Directive shall be aligned with Group SpeakUp & Investigations.

In case of immediate threat to life or property and for emergency assistance, the local authorities or emergency services must be contacted.

2. Commitments

PROTECTION FROM RETALIATION AND PROHIBITION OF MISUSE

Holcim firmly believes that effective reporting structures and an open and transparent culture help protect the Company, its employees, customers and business partners from damage and reputational harm.

Reporting persons and any third parties who are awarded protection by applicable laws do not have to fear any negative consequences, including such of discriminatory or disciplinary nature for making a report or raising concerns. Holcim does not tolerate any kind of threats, detrimental behavior or acts of retaliation. Such conduct is itself a breach and can result in disciplinary action.

This policy of non-retaliation also applies if you are not certain about the facts, provided you act in good faith. Acting in good faith means that you have reasonable grounds to suspect that, in light of the circumstances available to you at the time of reporting, the information reported is true or can be helpful in identifying a misconduct. False allegations or allegations not made in good faith, e.g. with malicious intent to harm another employee, will be considered misconduct and will not be tolerated. This may result in disciplinary, civil or criminal action.

Further, this Directive does not guarantee protection from disciplinary action if you yourself are involved in any misconduct. Nevertheless, the fact that you have voluntarily reported and supported an investigation can be considered as a mitigating factor in any disciplinary proceeding.

CONFIDENTIALITY AND ANONYMITY

Our reporting system allows anonymous reports if and to the extent permitted by applicable laws. Holcim will make every effort to keep your identity and your reports confidential unless:

- You have given your consent for disclosure.
- Disclosure is necessary for compliance with a legal obligation to which Holcim is subject.
- Disclosure is required for Holcim to effectively investigate the report.
- Disclosure is requested by law enforcement authorities.

DATA PROTECTION

Holcim attaches great importance to data protection and privacy as well as data security requirements. Holcim therefore adheres to applicable data protection laws and regulations as a minimum standard in relation to this Directive.

RETENTION OF RECORDS

Records of your reports and the related investigations will be stored in accordance with applicable laws and Holcim's data retention and deletion policy as long as this is necessary for the achievement of Holcim's legitimate interests. Legitimate interests include the establishment, exercise, or defense of legal claims as well as the operation of internal reporting channels and effective compliance management in line with legal obligations to which Holcim is subject. When the records are no longer necessary in relation to the purposes for which they were collected or otherwise processed, they will be deleted in accordance with applicable data protection laws and regulations unless continued storage is legally required.

3. How to report a concern

REPORTING TO HOLCIM

Holcim takes any concern of known or suspected misconduct seriously and thoroughly investigates them as per the standards defined in this Directive. You should therefore report any concern to Holcim directly at any time, using one of the available reporting channels listed below; Holcim employees have a duty to report.

When reporting a concern, you should submit a description of it and all relevant information on the facts in question, including the people involved and relevant background information. You should also submit any supporting documents or other evidence that could be helpful in investigating your concern.

When submitting information, you are free to choose whether you disclose your identity or remain anonymous, provided that this is permitted by applicable laws.

To report a concern, you can do so in person, by telephone, by email or online to any of the following reporting channels:

- Manager or supervisor
- Any employee within Human Resources
- Any employee within Legal and Compliance
- Any employee within Group SpeakUp & Investigations
- Integrity Line (SpeakUp Line), a global 24/7 confidential online service operated through a third-party supplier which is centrally managed by Group SpeakUp & Investigations.

In addition to these reporting channels, Holcim has implemented additional internal reporting channels at your respective country, where required. You can find further information on the respective internal channels on your local Holcim internet site.

The [Integrity Line \(SpeakUp Line\)](#) and additional information on reporting channels to Holcim is also provided on Holcim's internet and intranet sites.

EXTERNAL REPORTING

Reporting persons might have a separate reporting channel for certain types of known or suspected misconduct to competent national authorities. Reporting persons may refer to the competent national authorities' internet sites for information on when and how to report according to applicable laws and regulations. You can find further information on the

respective external channels on your local Holcim internet site and on Holcim's internet and intranet sites.

4. How concerns are handled

PROCESS FOR HANDLING CONCERNS

Any reported concern will be registered. When you submit a report, you will receive an acknowledgement within 7 days confirming receipt of the report and asking you to submit further information, if required.

Following a plausibility check and potentially immediate interim measures, any report with merit (i.e. where documented sufficient indications of potential misconduct pursuant to this Directive are identified) will be assigned for further investigation.

Subject of an investigation may be anyone (regardless of whether employed by Holcim or not) against whom reports of known or suspected misconduct connected to Holcim are brought forward. All Holcim employees are obligated in line with their terms and conditions of employment and subject to applicable laws to fully cooperate during the investigation and to not obstruct or otherwise interfere with the investigation, including by withholding information, providing misleading information or impairing the cooperation of others with the investigation. Investigations concerning third party subjects are based on applicable laws and contractual arrangements.

INVESTIGATION PRINCIPLES

Any investigation will be handled objectively, independently, fairly, not impaired by conflict of interests and in line with applicable laws, this Directive as well as other internal procedures. Holcim will cooperate with any parallel government inquiry or investigation and Group SpeakUp & Investigations will decide on a case-by-case basis how such inquiry or investigation will affect the internal assessment and investigation.

The subject will be informed about the investigation in compliance with applicable data protection laws and regulations. Such information will not be shared where doing so may jeopardize the effectiveness of the investigation, the protection of evidence or the reporting process. This requires a case-by-case analysis.

The subject will be considered innocent until proven otherwise. All departments involved in the investigation process must take the necessary steps to ensure that no disciplinary measures will be taken against the subject until misconduct has been established. Further, the subject will be given the opportunity to comment on the facts, which could be the basis for any disciplinary measure.

REMEDIATION AND TIMEFRAMES

Holcim applies a strict zero tolerance policy. Substantiated misconduct will be subject to remediation, which includes disciplinary measures and/or process improvements.

As the reporting person, you will receive feedback on the status of your report, where possible, both during an investigation and following closure, no later than 3 months after the date of the reported concern. Information is shared respecting the confidentiality of the process.

Some jurisdictions require that investigations must be conducted within certain timeframes, meet specific standards or requirements, and/or be coordinated with work councils or other external parties. If such requirements apply to an investigation, these will be followed.

5. Implementation and monitoring

RESPONSIBILITIES

Under the oversight of the Group's Ethics, Integrity and Risk Committee and, in extension, the Investigations Board, Group SpeakUp & Investigations holds responsibility for the end-to-end process to receive and handle reported concerns.

Group SpeakUp & Investigations is responsible for investigating concerns that pose a heightened business, legal, financial or reputational risk to the Company. Other concerns may be assigned for local investigation. Investigations are conducted by case managers who are trained representatives of Group, regional or local Legal & Compliance, Human Resources or other subject matter expert functions (such as Health and Safety, Security, Internal Audit, Internal Controls or Finance). Group SpeakUp & Investigation advises in planning and conducting local investigations.

Remediation of misconduct shall be initiated by the case manager and managed by the applicable business unit, considering Legal & Compliance, Human Resources and other functional advice.

Each CEO within Holcim is required to promote speak-up culture and support the implementation of this Directive. This includes sending at least one direct message to all employees within his or her organization annually, encouraging employees to speak up and to report known or suspected misconduct.

Please refer to the SpeakUp & Investigations SOP for more details regarding the end-to-end process to receive and handle reported concerns and to steer any necessary follow-up and remedial measures.

REPORTING

Group SpeakUp & Investigations shall provide periodic reporting to the applicable governance and management bodies of investigation activities and outcomes.

TRAINING

Employees shall familiarize themselves with this Directive. Group SpeakUp & Investigations provides regular awareness, guidance and training materials.

If you have any questions about this Directive, please contact your local or regional Legal and/or Compliance Officer or Group SpeakUp & Investigations. They will provide you with all the support and information needed.

| DOCUMENT CONTROL | | | |
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| Approved by: | Head Legal and Compliance | | |
| Related Policy, Directives and MCS | <ul style="list-style-type: none"> • Code of Business Conduct • Compliance Policy • Group SpeakUp & Investigations SOP • MCS1 | | |
| VERSION CONTROL | | | |
| Version Number | Date Issued | Author | Update information |
| Version 0 | April 1, 2021 | Group Legal & Compliance | This version replaced the previous Compliance Reporting and Compliance Investigations Directives |
| Version 1 | September 1, 2023 | Group Legal & Compliance | Periodic update |