

Holcim Compliance Program

Frequently asked questions

April 2025

What steps does Holcim take to prevent, detect and correct compliance risks such as bribery and corruption?

The Compliance Policy specifies a system of adequate procedures. These procedures are structured into a five element Compliance Program which is as follows:

- Risk Assessment. The program is based on a review of the risks present in the business. The compliance risk assessment enables the development of controls that target and mitigate the identified and assessed risks.
- Controls. Controls include the policies, directives, entity level and transactional internal controls, guidance and advice to the business through which mitigation measures are structured and implemented.
- Training and Communication. The implementation of controls and the recognition of risks require that the compliance function communicate and train employees. Such communication and training is developed and delivered on a risk basis across the group.
- Monitoring and Follow-up. The conduct of risk assessments, the implementation of controls, and the delivery of training and communication is monitored and reported to the first line management, executive management and the governing bodies of the group. There is provision for an alert system, warning of possible breaches in the code of business conduct, laws and regulations, an investigation capability, ongoing functional review of the performance of the compliance program in specific geographies, internal audit and continuous improvement.
- Organization and Governance. The group assigns roles and responsibilities sufficient to support the requirements of the compliance program and provide oversight of such resources through the governance of the Ethics, Integrity and Risk Committee (EIRC).

Who is accountable for anti-bribery and corruption compliance in Holcim?

Every employee, manager, officer or director of the company is responsible for their actions and the requirements for compliance apply equally to all.

- Bribery and corruption risk is addressed through the Compliance Program. This is a five element, structured set of behaviorally based activities that line managers are required to implement in their business.
- The operational management in Holcim is accountable for the conduct of business. This accountability flows from the Group CEO to the Heads of Region, to the Country CEOs and subordinate P&L leads.

- The Compliance Policy¹ states:
 “With respect to its role as a compliance assurance provider, the Compliance Function (together with the Legal and Internal Control Function) forms the *second line* under the “Three Lines” model:

 “1st Line: Holcim business and management *owns, implements and operates business controls to ensure compliance* with laws, regulations and policies (including supervisory controls).”
- The ‘CEO Checklist – Managing Compliance risk in a Holcim Company’ states that the CEO of a Holcim business has full accountability for the management and operations of everything that happens in the business.

How does Holcim assess that the compliance procedures, specifically those for prevention of bribery and corruption, are adequate to the level of risk?

- The first element of the Holcim five element compliance program is risk assessment. It sets the conditions by which the rest of the program is both designed and assessed for adequacy. The compliance risk assessment (CRA) is conducted annually at a country level and aggregated for oversight purposes at region and group levels.
- The CRA is integrated with group risk management, to provide at country, region and group levels a single, integrated view of risk. The CRA includes a specific risk for ‘business integrity’ which includes a specific risk manifestation for bribery, corruption and influence peddling.
- The process first assesses inherent risk, then assesses residual risk by applying the mitigating impact of risk controls, of which there are 4 categories assessed across each of the three lines.

Is record keeping and formalized approval processes included in the Holcim compliance program?

Multiple procedures are implemented in the Holcim group to ensure record keeping, approvals and behavior:

- The Holcim policy landscape is the group architecture for controls, and includes policies, directives and internal controls standards that are applied in operating companies across the group. The policies, directives and internal control standards set requirements, which in many cases include record keeping (documenting), approvals and behavioral guidance.
- The Code of Business Conduct is the overarching operating guide to behavior.
- Accurate record keeping is an identified requirement in the Code of Business Conduct (section 2.4).

¹The policy includes anti-bribery and corruption in scope.

- Record keeping and approvals are required under the Minimum Control Standards (MCS) of the group (a set of 64 control standards that are mandatory in every operating entity and reviewed on an annual basis).
- There is a documented Group Delegation of Authority (GDA) that specifies levels of authority required for decisions.
- The GDA and MCS are subject to Internal Controls effectiveness testing and reporting (2nd line) and internal audit (third line).

Does the Code of Business Conduct apply to all employees? How does Holcim ensure that employees are aware and understand the requirements of the Code of Business Conduct?

Every employee is onboarded to the values and expectations in the Code of Business Conduct (which includes behavior requirements in relation to anti-bribery & corruption) through introductory training when they are inducted to the company. In those countries where written acknowledgement is permitted, this is obtained.

The Code of Business Conduct, (translated in multiple languages), is available on corporate websites, the intranet and in hard copy.

CEOs of Holcim operating companies conduct annual communications campaigns to refresh understanding and awareness of the code.

Does Holcim conduct regular training on anti-bribery and corruption?

- Training and communication is one of the five compliance program's elements at Holcim. Every country has an annual training plan which is tracked and reported transparently through compliance performance metrics (known internally as the compliance '6-pack').
- Training is delivered both through e-learning and face-to face training sessions. E-learning training is provided to a broad employee audience. Face-to-face training is given to employees in functional positions that face heightened exposure to compliance risks. Training attendance is tracked and follow-ups are conducted.
- Holcim implements a training cycle (updated every two years) which requires each operating country to run assorted e-learning and face-to-face courses each year. High and medium exposed employees undergo training every year.
- In 2024, a total of 23,458 role-relevant business integrity face-to-face training and 48,658 business integrity e-learning were completed.

Does Holcim have a mechanism by which employees can report concerns regarding misconduct?

- To support transparency over its conduct and business integrity, Holcim encourages 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 of Business Conduct or other applicable policies and directives, can be reported. Holcim manages a global reporting system called Integrity Line to facilitate employees, suppliers, customers, or members of the public to report any concerns. Holcim employees have a duty to report their concerns and Holcim views active reporting as a healthy indicator of an integrity culture. The Integrity Line is provided by an independent third party and all reports are objectively assessed and investigated if required. The Integrity Line has external and internal web portal, telephone and backend intake methods.
- In 2024, a total of 1,067 reports were received in the Integrity Line, out of which 668 were reports of misconduct that required further assessment or investigation. The reporting categories of the 668 reports included: Human resources, Diversity and workplace respect (340/51%); Business integrity (170/25%); Misuse or misappropriation of assets (76/11%); Health, Safety & Environment (60/9%); Accounting, auditing & financial reporting (6/1%); Other (16/3%). 44 cases resulted in dismissals, 66 cases in other employment/disciplinary measures and 76 cases in process improvements, including training, third-party related sanctions and control adjustments.
- Every report is reviewed by a dedicated group investigation team that is overseen by a cross-functional Investigations Board. When a report is assigned for investigation, the investigation is conducted in accordance with the relevant laws and protections of the whistleblower and the subject, privacy and the confidentiality of the matter. The entire process falls under the governance of the group Ethics, Integrity and Risk Committee, a sub-committee of the Audit Committee.
- All reports are treated seriously, and the confidentiality of the involved parties are preserved to the extent possible. Holcim applies a zero-tolerance policy regarding any misconduct and any retaliatory actions against whistleblowers.

How can employees of Holcim consult and seek advice on ethical issues they encounter during their daily work?

Holcim has two primary mechanisms by which employees can consult on ethical issues:

- Compliance is part of the legal department, and in operating companies, the general counsels and their teams are in the front line for driving lawful and ethical behavior. Employees have ready access to legal and compliance specialists at corporate level and in every operating business, with whom they can consult.
- Employees can also seek advice through the *IntegrityLine* (which has an 'ask a question' function) or also write directly to either group compliance or group investigations for advice.

How does Holcim verify that the compliance program is implemented in the operating businesses of the group?

The *monitoring and follow-up element* of the Holcim Compliance Program includes five separate mechanisms to check implementation of the program in operating entities. These are as follows:

- Compliance 6-Pack. Holcim implements a system to monitor compliance implementation through the tracking of metrics linked to key performance indicators. There are 6 specific metrics and they are tracked in all Holcim operating countries. The 6-pack tracks performance metrics for training, communications and third-party due diligence; and, assurance metrics for internal audit, internal controls and risk assessment actions.
- Testing of Compliance MCS. The Holcim Internal Control Function independently tests the implementation of all the MCS in a country, including the compliance MCS. This is certified by the country CEOs on an annual basis.
- Internal Audits. The Holcim Internal Audit Function conducts audits of the operating entities which include the compliance controls and related MCS in the scope of the audit. The resulting findings and any applicable management actions are reported and tracked by Group Compliance through to close-out.
- Holcim IntegrityLine. The Holcim whistle blower mechanism (addressed earlier in this FAQ) provides alerts to possible control failures or misconduct.

In addition to the mechanisms designed into the Holcim Compliance Program, Holcim's external auditors also conduct independent reviews of the compliance controls throughout the year and perform deeper investigation on selected operating entities each year.

How does Holcim maintain and update the compliance program to meet the requirements of changes in law and regulations, and in best practice?

Holcim promotes continuous improvement to ensure that the Holcim Compliance Program remains fit-for-purpose and delivers a system of adequate procedures. Each of the elements of the Compliance Program - risk assessment, controls, training and communications, monitoring and follow-up, and organization and governance - is reviewed and assessed by the Ethics, Integrity and Risk Committee, which decides on any program adjustments resulting from changes in law, regulation or emerging best practices.

In addition, Holcim engages external compliance expertise to periodically review the Holcim Compliance Program and benchmark it to leading peers. The latest external review was engaged in 2024.