

CLIMATE POLICY ENGAGEMENT REPORT

2025

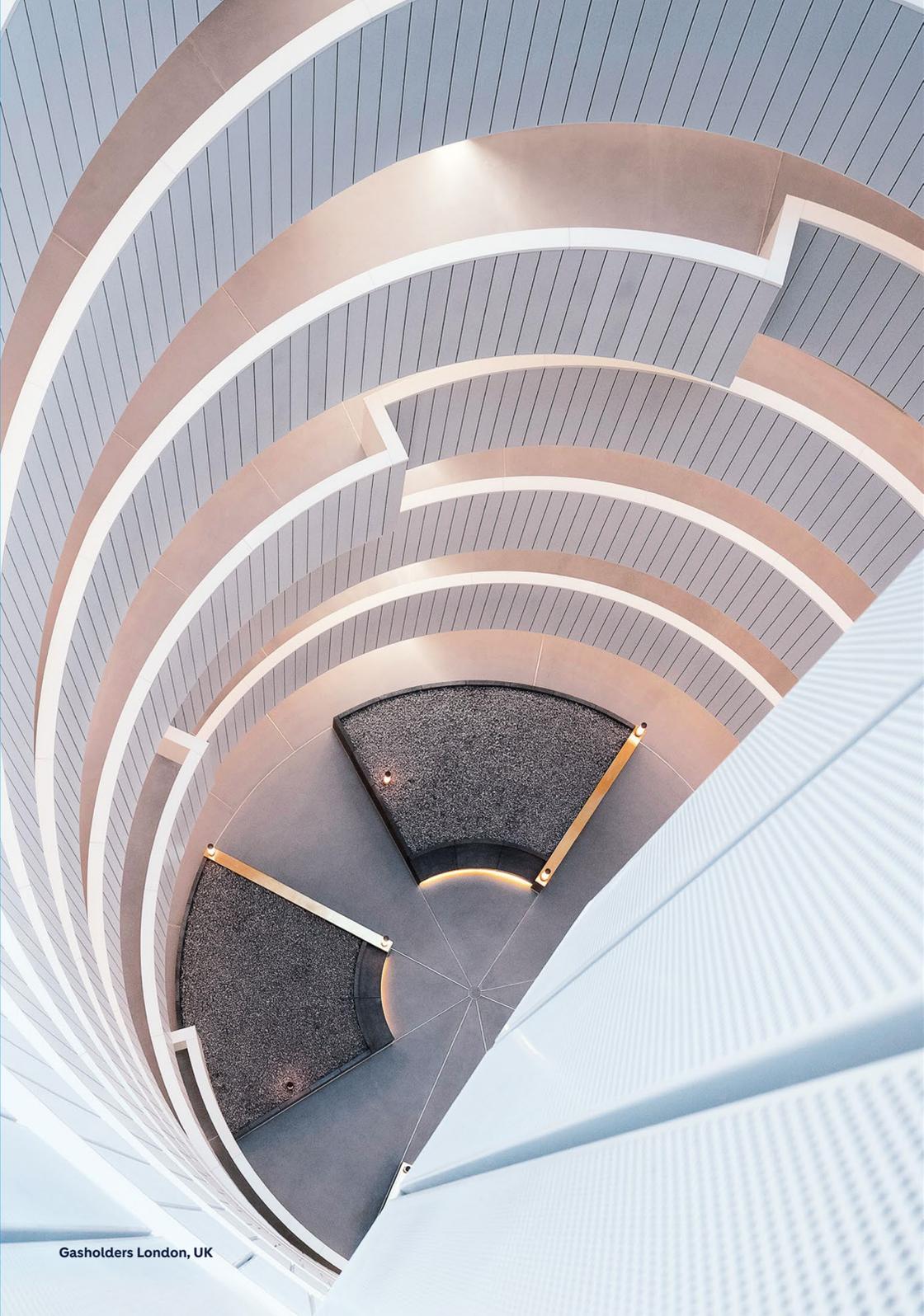


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FOREWORD

2025 was a milestone year for Holcim with the launch of our NextGen Growth 2030 strategy which accelerates the scale-up of our sustainable offering - from ECOPact and ECOPlanet to ECOCycle - across all of our markets. We restated our 2030 and 2050 science-based climate targets as well as our 2020 baseline, while maintaining our commitment to achieve net-zero greenhouse gas (GHG) emissions across our operations and value chain by 2050.

To deliver on our 2050 ambition, we will continue to deploy our traditional decarbonization levers and progressively scale up advanced technologies, including carbon capture, utilization and storage (CCUS). Holcim is driving the industry's broadest portfolios of decarbonization technologies to meet its 2030 and 2050 net-zero objectives.

Close collaboration between public authorities, industrial partners and local stakeholders is essential to realize this ambition and unlock competitive business cases for decarbonization. At Holcim, we are committed to advocating for public policy frameworks that are aligned with the global 1.5°C pathway, grounded in circular economy principles, that support increased demand for low-carbon solutions and enable the scaling-up of advanced technologies. Our Climate Policy guides our actions in a rigorous, science-based manner to fulfil our net-zero pledge, in full compliance with local, state, federal and regional regulations, while promoting collective action among relevant stakeholders.

In this spirit, we will continue to review our memberships in external trade associations and industry bodies to ensure alignment with Holcim's net-zero journey and the global 1.5°C framework. We are working closely with our partners to accelerate and strengthen their commitments to the Paris Agreement and to secure consistency with our own climate ambitions.



Carmen Diaz
Chief People and
Sustainability Officer



Cédric de Meeûs
VP, Group Public Policy
and Government Relations

INTRODUCTION

Holcim is a signatory to the UN Global Compact's Business Ambition for 1.5°C campaign, committing to align its climate objectives and operational actions with the 1.5°C pathway. This pledge underpins our rigorous SBTi-validated targets for 2030 and 2050 which in turn guide our advocacy and stakeholder engagement.

We aim to deliver decarbonized cement and concrete at scale to customers from 2030 onward, while contributing to the realization of ambitious public policy objectives such as Europe's Clean Industrial Deal.

Realizing these ambitions at the required pace demands close collaboration with stakeholders, value-chain partners and public policy makers. It hinges on forward-looking policy frameworks that bolsters the long-term competitiveness of pioneering "first-of-a-kind" technologies, fosters new industrial carbon management value chains and accelerates the demand for low-carbon solutions in global markets. Public-private partnerships are thus critical to de-risking and deploying these large-scale innovations.

At Holcim, we have embedded sustainability as a core driver of profitable growth—not just because it's the right thing to do, but because it delivers compelling business value. This conviction is anchored in our direct and indirect advocacy that fully aligns with the Paris Agreement's 1.5°C goals.

Our dedication to the global climate agenda shapes all advocacy and engagement activities detailed in this report, from governance structures and direct outreach to indirect initiatives and ongoing reviews of alignments with external bodies.





Zipingpu Bridge, China

CLIMATE POLICY ADVOCACY GOVERNANCE

Holcim’s corporate advocacy and engagement on climate policy is governed by the Group Public Policy and Government Relations team, in collaboration with other Group functions, regional and country experts.

Our advocacy approach is structured around a number of principles and processes, among which:

Priority Setting: climate advocacy objectives and priorities are developed in close collaboration with corporate and country experts to ensure alignment with the 1.5°C pathway. These priorities are outlined in our Climate Policy Positions Paper updated every year and are reflected in later sections of this report. Annex 1 details how our positions align with the 1.5°C agenda.

Internal Alignment and Communication: advocacy messaging and guidance are shared with leaders and in-country teams responsible for engaging key stakeholders and advancing our advocacy priorities at the local level. This coordination is structured through Public Affairs networks that enable regular briefings, knowledge exchange, and the review of advocacy positions, narratives, and initiatives.

Responsible Lobbying: the “Responsible Lobbying and Advocacy Directive” ([here](#)), was updated in 2025 to reflect our commitment to the Paris Agreement and to Human rights in all our advocacy activities and to strengthen our governance model and transparency efforts. The Directive requires Holcim employees to conduct all lobbying activities transparently, ethically, and in full compliance with applicable laws. This includes adherence to relevant public codes of conduct and lobbying registers where applicable. At the EU level, Holcim’s climate advocacy activities are disclosed through the EU Transparency Register (Reg. No. 225005818352-31). Participation in industry and business associations is subject to mandatory compliance training and regular review.

DIRECT CLIMATE POLICY ENGAGEMENT

At Holcim we actively engage with policy-makers, industrial partners and stakeholders to address global and specific climate policy issues.

We champion public policy frameworks that are anchored in circular economy principles, aligned with the Paris Agreement's 1.5°C target and designed to enable innovative and competitive low-carbon growth. Our 2025 policy priorities are outlined below.

COMPETITIVE INDUSTRIAL DECARBONISATION

As part of our NextGen Growth 2030 strategy, we have made decarbonization a driver of profitable growth. This aligns with a key objective of the EU Clean Industrial Deal: ensuring European industry remains competitive while advancing climate action. Our approach is driven by the large-scale deployment of advanced technologies, such as Carbon Capture Utilization and Storage (CCUS), and the introduction of low-carbon solutions, such as ECOPact low-carbon concrete and ECOPlanet low-carbon cement, on construction markets globally.

The competitive deployment of such technologies and solutions is facilitated by policy measures such as carbon pricing or emissions trading schemes. In that regard, Holcim advocates for:

- an international level playing field on carbon costs through mechanisms such as Europe's Carbon Border Adjustment Mechanism (CBAM), fair state aid rules for energy-intensive sectors, and dynamic carbon pricing;
- access to competitive decarbonized energy via a well-functioning and interconnected electricity market;
- the development and deployment of decarbonised energy solutions, for instance with instruments to incentivize a sustained access to non-recyclable and biomass waste as alternative fuels.



EXAMPLES OF ADVOCACY ENGAGEMENTS IN 2025:

- In January, at the Annual Meeting of the World Economic Forum (WEF) in Davos, Holcim engaged with industrial partners and members of national delegation on the deployment and de-risking of low-carbon technologies and advancing the uptake of low-carbon solutions in the market.
- To support the implementation of the Carbon Border Adjustment Mechanism (CBAM) Holcim provided feedback to the EU Commission as part of its consultation with stakeholders on the operational challenges in setting up the CBAM system in time for the 2026 official kick-off.
- Holcim has engaged directly with Parties involved in the Basel Convention on the Transboundary Transport of Waste, and in particular the revision of ANNEX IV which defines and classifies waste recovery operations, defining the need for an "R15" co-processing in order to facilitate and accelerate the substitution of fossil fuels in industrial operations.

SUPPORT THE DEPLOYMENT OF ADVANCED DECARBONISATION TECHNOLOGIES

Holcim is driving the industry's broadest range of decarbonization technologies, from the utilization of innovative low-emission raw materials, like calcined clay and recycled decarbonized cement paste, to fossil fuel-free energy and CCUS.

Recognising the need for adaptable solutions to ensure their deployment at scale, at Holcim we advocate for:

- a flexible yet clearly defined regulatory framework supported by adequate and dedicated financing mechanisms covering both OPEX and CAPEX costs;
- flexibility within existing financing mechanisms thus taking into account the risks faced by “first-movers”¹ especially where complex value-chains are yet to be established (e.g. the full CCUS value-chain);
- de-risking mechanisms that facilitate private investment and encourage early adoption of innovative technologies (e.g. Carbon Contracts for Difference);
- implementation of the right investment conditions across the whole CO₂ value-chain, including: access to onshore and offshore storage options, supported by clear rules for CO₂ cross-border transport and CO₂ specifications;
- regulatory clarity and consistency for decarbonization solutions such as CO₂ utilization, while acknowledging the role that captured CO₂ from unavoidable process emissions has in the economy as a source of efficiently-available CO₂ to be used as feedstock for many applications (incl. e-chemicals and e-fuels).

¹ often subject to external costs factors beyond their control (e.g. costs linked to energy, transport and access to infrastructure)

EXAMPLES OF ADVOCACY ENGAGEMENTS IN 2025:

- In March, Holcim attended the Europe annual meeting of the Global CCS Institute showcasing the role of the CCUS technology to decarbonise cement manufacturing.
- In May, we launched our OLYMPUS CCUS project in Milaki (Greece) with the participation of Prime Minister Kyriakos Mitsotakis, Holcim's leadership team, our key partners and local and national stakeholders. This milestone marks a major step in our efforts to decarbonise the cement industry in Greece.
- Holcim continuously shared its on-the-ground experience in EC-led 'knowledge sharing' workshops, highlighting challenges and opportunities, and providing solutions and best practices, for example on permitting, to enable CCUS deployment at scale.
- Throughout the year, we contributed to expert discussions and provided technical input on the critical need for standardized sets of CO₂ specifications to support the deployment of CCUS transport infrastructure across Europe.
- Holcim actively participated in workshops and provided input to public consultations to support the development of a comprehensive legislative package aimed at developing CO₂ infrastructure, including common rules to facilitate CO₂ cross-border transport.
- In December, we attended the annual meeting of the Industrial Carbon Management (ICM) Forum hosted by the Greek government and the EU Commission in Athens (Greece), calling for a comprehensive policy framework with incentives to scale CO₂ storage, facilitate cross-border transport, de-risk the CO₂ value-chain and accelerate CCUS deployment with the support of the public, thus enabling the decarbonisation of our industry across Europe.



FOSTER DEMAND FOR LOW-CARBON PRODUCTS

Holcim is at the forefront of driving the transition to low-carbon, circular construction by delivering innovative products and solutions on a global scale. A systemic growth of low-carbon and circular product requires a structured approach towards decarbonised construction and buildings, and as such we advocate for:

- progressive, predictable and material-neutral building regulations, with focus on building whole lifecycle where all material and technologies are part of the solution;
- progressive public procurement practices while integrating sustainability performance alongside traditional metrics such as safety, performance, durability and affordability to create lead markets for low-carbon, circular products;
- dynamic standardization framework that would enable companies to roll out innovative techniques without further delays, supported by enabling building codes;
- incentives to improve circularity of secondary raw materials via for example a ban on landfilling of construction & demolition waste, while incentivising recycling processes, and encouraging circularity and life-cycle thinking throughout the construction value-chain.

EXAMPLES OF ADVOCACY ENGAGEMENTS IN 2025:

- In June, Holcim led discussions at Cement Europe General Assembly on how to incentivise and accelerate a stronger market uptake of low-carbon and circular products through progressive public procurement practices that integrate sustainability performance. Discussions were attended by representatives from the EU Commission, MEPs as well other leading companies and organisations.
- Holcim played a proactive role in the organisation of the 1st European Sustainable Construction Summit in June 2025. It emphasised the importance of construction as one of the most resilient pillars of the economy and demonstrated how circular and low carbon solutions are becoming a reality;
- Throughout the year, Holcim developed an engagement programme in Spanish and Croatian cities aimed at raising awareness of the value of upcycling construction & demolition materials. It participated in engagement programmes with local value chain actors to accelerate circular construction models through collaboration, regulatory changes and pilot projects.

CIRCULAR ECONOMY AND URBAN POLICIES

In 2025, Holcim strengthened its practical engagement on the circular economy, for instance, amid key EU policy developments on the circular economy spanning the revision of the Waste Framework Directive, the formulation of EU end-of-waste criteria, to the revision of Construction Products Regulation. This included active participation in consultations and calls for evidence launched by legislators as well as cross-sector collaboration to drive the adoption of circular practices.

To advance global advocacy and foster partnerships, we took part in relevant coalitions, such as the Circular Leaders Group of the Ellen MacArthur Foundation, and took on a leadership role in convening business leaders from across the construction value chain together with policymakers to explore unlocking the value of existing buildings and infrastructure.

In 2025, we put cities at the heart of our advocacy work on the circular economy acknowledging its central role in driving the circularity agenda. Our focus was on contributing data, expertise, and local experience to help shape effective regulation, support cities in closing material loops, and demonstrate how circular construction can work in practice.

RESPECTING HUMAN RIGHTS AS PART OF A JUST TRANSITION TOWARDS A DECARBONISED ECONOMY

We take a whole-society approach to reaching net zero, respecting labor and human rights while creating stimulating jobs. We are committed to decarbonization in line with the Just Transition principles, assessing and addressing the impacts of our journey to net zero on four key stakeholder groups: our people, our suppliers, our communities and our customers.

As part of its climate policy engagement, Holcim supports the implementation of regulatory frameworks that require mandatory human rights and environmental due diligence. Establishing common legal requirements, such as those that are proposed at the European Union level, ensures consistent standards across industries and contributes to bringing companies to the same standard. It also ensures that efforts made by companies to respect people and the planet are not undermined by the lack of uniform standards. Such regulatory frameworks increase legal certainty and ensure a competitive level playing field, to the benefit of the environment and of local communities.

EXAMPLES OF ADVOCACY ENGAGEMENTS IN 2025:

- In January 2025, we addressed a joint letter with other like-minded companies to EU commissioners urging the European Commission to leverage circular economy solutions within the EU Clean Industrial Deal to boost European competitiveness, strategic resilience, and carbon neutrality.
- In June, during the London Climate Week, we organised a panel discussion on “Circular construction: the hidden value of urban mining” with the City of London, Arup, British Land, and Multiplex. That event explored the role developers, manufacturers, contractors and cities have in unlocking the value of existing buildings and infrastructure.
- We provided input for the development of an End of Waste criteria for mineral construction and demolition waste in August and participated in the various stakeholder consultations of the Joint Research Center.
- In October, we welcomed the members of the Carbon Neutral Cities Alliance to the Holcim Innovation Center for a day of exchange on the built environment, featuring three deep-dive sessions on embodied carbon, resilient buildings, and circular construction. Policy officers, climate directors, urban planners, and Deputy Mayors of 13 European cities engaged with Holcim experts on industry innovation that can be implemented at city level to address climate challenges.
- In November, we responded to the Circular Economy Act consultation and Call for Evidence and provided specific input on landfill regulations, pre demolition audits, public procurement and EPR (Extended Producer Responsibility) schemes.

INDIRECT CLIMATE POLICY ENGAGEMENT

We emphasize our commitment to Paris Agreement and our net-zero targets through active collaboration with like-minded partners and stakeholders as well as through trade associations, industry coalitions such as "We Mean Business" and international organisations such as the "World Green Building Council".

As outlined in the previous section on public policy enablers, some of the topics that Holcim engages on include regulatory frameworks linked to CCUS, carbon pricing schemes, the development of competitive decarbonized energy networks and the achievement of common definitions and standards of low-carbon cement and concrete.

ADVOCACY THROUGH MULTI-STAKEHOLDER COLLABORATION IN 2024

Partnership is the new leadership, and to meet our climate targets we collaborate closely and transparently with stakeholders and partners. Throughout 2025, we actively engaged with recognized and leading global organizations and coalitions such as the World Economic Forum (WEF) and the World Business Council for Sustainable Development (WBCSD) on advancing the principles of the circular economy and achieving the Paris Agreement's objective. We also collaborated with partners such as Global CCS Institute and the Leadership Group for Industrial Transition (LEAD IT) to enable industrial decarbonisation at scale and with the World Green Building Council (WGBC) to accelerate the decarbonization of the built environment.

EXAMPLES OF ADVOCACY ENGAGEMENTS IN 2025:

- In February, we sent a joint letter to European Commission President Ursula von der Leyen, together with other leading business and Construction leading companies, encouraging the **European Commission to recognise the strategic importance of the construction sector** and to ensure that it features at the heart of Europe's industrial policy and competitiveness agenda, including the forthcoming Clean Industrial Deal.
- In July, as part of the **European Leaders for Growth and Competitiveness initiative launched by the World Economic Forum**, Holcim's CEO Miljan Gutovic took part in a delegation comprising 70+ world's business and industry leaders to the EU Commission. The Business Delegation focused on competitiveness across clean industry infrastructure, energy markets and emerging technologies while emphasizing on public-private collaboration as an enabler.
- In October 2025, **endorsed COP30 open letter from the World Economic Forum** to world leaders highlighting how investment in green products and tech drives returns, resilience and growth. The letter calls for deeper collaboration between governments and businesses for decarbonization. Letter is accessible [here](#).
- In November, Holcim signed the **World Green Building Council's Business Action statement** calling for COP30 negotiators to accelerate the building sector's sustainable transition by enabling green finance flows, resilient energy systems and the scaling of adaptation and resilience in the built environment. The Action statement can be found [here](#).
- Throughout the year, we pursued our collaboration with the World Business Council for Sustainable Development (WBCSD) on different work streams including Transformation of the Built Environment, Circularity, Nature Based Solutions as well as Positive Policy Engagement. We were proud to join the **WBCSD's Global Circularity Protocol (GCP) Frontrunner Coalition** to help drive global circularity standards and support the GCP launch at COP30.



INDUSTRY ASSOCIATIONS REVIEW

Our commitment to climate related reporting is transparent and rigorous and we take the same approach in our advocacy positions. Aligned with our net-zero pledge, Holcim is committed to ensure that our indirect advocacy through trade associations is aligned with the Paris Agreement and Holcim's positions.

For this reason Holcim conducts a systematic annual trade association review and follow up. The review is articulated around our main priority climate advocacy areas, outlined below:

- The support of the Paris Agreement's climate ambition and net-zero agenda;
- The support of carbon pricing mechanisms;
- The need to develop 2050 decarbonisation roadmaps;
- The acceptance of the need to deploy advanced decarbonisation technologies, including CCUS;
- The support for the creation of demand-pull policies for low-carbon products and solutions.

The review covers a number of key strategic organizations that Holcim is member of, in order to assess the level of alignment of an organization with Holcim's advocacy positions on the five priority advocacy areas outlined above. The results can vary between aligned, not-aligned, not-applicable or other (indicating specificities in certain cases).

Where any selected organization has a material misalignment or diverging views with Holcim's policy positions, we commit to - wherever feasible and applicable - work closely with the organizations concerned to address the misalignment. In extreme cases, where alignment is not possible and where mis-alignment cannot be duly justified by reasonable contextual factors, we can dissociate ourselves or renounce our membership / mandate from the trade association. In other words, we are committed to work with our trade associations to accelerate our common journey towards the 1.5°C objective, we address misalignments and, if necessary, reconsider our membership or association with such organisations.

OUR JOURNEY

Our first review was conducted in 2021, it covered 20 organizations in Holcim's key markets that are representing 80% of our advocacy spend. This first review did not reveal any major misalignments of the selected trade associations with Holcim's positions but rather areas where further engagement and steering would allow to close the gap (e.g. lack of a net-zero roadmap or the absence of a clear and publicly available stance on their commitment to the Paris Agreement).

In the following years, we focused our efforts on bringing those organizations to alignment, wherever feasible and applicable. We, hence, pursued the work with our trade associations; many of them have developed their Net-Zero roadmaps and have publicly expressed their support for the Paris Agreement and their climate positions. In subsequent years, the number of associations covered decreased from 20 organizations to 17, due to two business divestments and one dissociation from the US's Portland Cement Association (PCA).

2024 INDUSTRY ASSOCIATIONS CLIMATE REVIEW

Last year we extended our review to new organizations following the selection criteria detailed in the 2024 Climate Policy Engagement report that can be consulted [here](#). The new organizations include global and regional organizations that we engage with to advocate and advance the global climate and decarbonization agenda, as well as local organizations in our key markets.

2025 INDUSTRY ASSOCIATIONS CLIMATE REVIEW

This year, we followed the same methodology as last year in terms of relevance of the organization to the climate agenda, Holcim's level of influence within the organisation and the spent threshold of > 200 KCHF.

Our review focus this year was to:

- Reassess and update the organisations scope following the spin-off of the North American business and our methodology criteria.
- Follow up and update on any ongoing gaps in trade associations alignment.



Reassessment of organisations in scope resulted into:

- 1 The addition of the Spanish CEOE Federation.*
- 2 The addition of one new organisation CEMENT & BETON Centrum in the Netherlands (> 200K CHF threshold).
- 3 The removal of North American associations as a result of business spin off.

*Following InfluenceMap recommendation.

Engagement process

New organizations in scope were assessed by engaging directly with their representatives through self-assessment questionnaires, follow up discussions and exchanges and by reviewing their public positions using publicly available information. Previously reviewed organisations where some gaps were identified in the previous year, were sent follow up communications directly or through our local public policy focal point of contacts. Remaining open issues were discussed and addressed on a case by case basis.

ANNEX 1

Alignment of Holcim Policy
Position with the 1.5°C Agenda



HOLCIM CLIMATE POLICY CATEGORY	SUMMARY	ALIGNMENT TO 1.5°C	RATIONALE
Enabling Carbon Capture Storage and Use (CCUS)	Holcim is advocating for both CCU and CCS to be part of the EU policy framework on industrial carbon management, alongside a dynamic, accessible and competitive value chain for CO ₂ transport and storage	■ Yes	<p>The Holcim SBTi trajectory, which is in line with the 1.5°C framework, includes CCUS as a lever in the aligned trajectory towards decarbonization and as an essential solution for unavoidable process emissions.</p> <p>CCUS is recognised in public policy frameworks as a necessary element of the pathways towards climate neutrality. In the EU, CCUS is recognised in National Energy and Climate Plans.</p>
Grow market demand for low carbon products and services	Holcim is advocating for the establishment of public procurement frameworks (e.g. standards and building codes) that create a demand-pull for low carbon products and services	■ Yes	<p>Standards, building codes and public procurement mechanisms play a fundamental role in creating supply-demand momentum in the value chain, including in support of low carbon products and solutions.</p> <p>The acceleration of the uptake of low-carbon products and solutions at scale will accelerate the decarbonisation of the built environment (contributing up to 40% of global emissions) and therefore the achievement of the Paris Agreement objectives.</p> <p>These principles are starting to be implemented in certain countries and well recognised in international literature as part of the transformation of the construction and buildings sectors and achieving climate neutrality by 2050</p>
Implement carbon pricing and carbon border adjustment mechanisms (CBAM)	Holcim is advocating of carbon pricing mechanisms as a lever for investments in low carbon technologies and products, as well as, at EU-level, a fast and “watertight” implementation of CBAM	■ Yes	<p>The EU’s CBAM is the EU’s tool to put a fair price on the carbon emitted during the production of carbon intensive goods that are entering the EU, equivalent to the carbon costs paid by domestic producers. It encourage cleaner industrial production in non-EU countries.</p> <p>CBAM is a central element of Europe’s strategy to become the world’s first climate-neutral continent by 2050 and meeting the Paris Agreement’s objective to limit global warming to 1.5°C.</p> <p>A timely implementation of CBAM will provide the necessary foundations for large scale investments in the decarbonization of our activities and products across the EU and further afield.</p>

HOLCIM CLIMATE POLICY CATEGORY	SUMMARY	ALIGNMENT TO 1.5°C	RATIONALE
Use Life Cycle Assessment (LCA) and performance as the principles lever to move the construction value chain towards the systematic use of low carbon and circular construction solutions and products.	Holcim is advocating for material and technology agnostic policy frameworks, where all materials and technologies can be part of the solution, on the basis of their life cycle performance, including in terms of carbon. Life Cycle Assessment (LCA) and ensuing wholelife performance on end products (eg. buildings) enable to define the carbon and circularity performances needed to be aligned to the 1.5°C agenda and must become the norm for any construction projects.	■ Yes	<p>Decarbonizing construction and making the value chain truly circular does not rely on a single technology, material or sub-sector. A policy framework and vision must be based on technology neutrality and full lifecycle performance.</p> <p>Deploying carbon Life Cycle Assessment at scale across the construction sector will lead to a dynamic market based on low carbon innovation and performance, which will accelerate the transition towards the 1.5°C objective.</p> <p>Life cycle thinking allows us to focus on the solutions where emissions can be reduced most efficiently and incentivise innovation. As such, the Paris Agreement emphasizes the instrumental role of innovation in reaching the 1.5°C target.</p>
Enabling competitive decarbonized energy	Holcim is advocating for accessibility of decarbonized energy at competitive prices, favorable conditions for renewable energy investments and industry access to non-recyclable waste and biomass waste.	■ Yes	<p>A well-functioning interconnected electricity market where there is access to decarbonized energy at scale and at competitive prices is the cornerstone for the decarbonization of European industry and its short & long-term competitiveness.</p> <p>Non-recyclable waste and biomass waste for an integral part of the cement sector's transition away from fossil fuels.</p> <p>As per the COP28 agreement, the phasing out of fossil fuels forms a central element to achieve the objectives of the Paris Agreement.</p>
Implement carbon pricing and carbon border adjustment mechanisms (CBAM)	Holcim is advocating for facilitating access to combined sources of optimised financing mechanisms including simplifying application and approval processes, inclusion of CCUS and the deployment of de-risking mechanisms (eg. Carbon Contracts for Difference or CCFDs) for First of a Kind Projects.	■ Yes	<p>Decarbonization technologies and projects such as CCUS are recognised in public policy frameworks as a necessary element of the pathways towards climate neutrality and reaching the objectives of the Paris Agreement..</p> <p>Given the high cost of such projects, access to combined sources of funding is necessary in order to build strong business cases and ensure that such low carbon technology can be deployed in the short-term.</p> <p>Transparency, easy access and procedural simplicity of various sources of funding are hence important enablers for deployment and implementation.</p> <p>The deployment of CCFDs at EU and national level will allow for a de-risking of projects based on access criteria that are simple and fast in execution.</p>

ANNEX 2

Trade Associations
Review Assessment



		Supports paris agreement and net-zero agenda	Supports the use of carbon pricing mechanisms	Existence of a net-zero roadmap (for industry associations)	Acknowledge the need of advanced technologies, including ccus	Supports the introduction of low-carbon/net zero products on the market
W	GCCA	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
EU	CEMBUREAU	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
AU	CCAA	■ Yes	■ Other No formal position	■ Yes	■ Yes	■ Yes
NZ	Concrete New Zealand	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
UK	MPA	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
FR	France Ciment	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
BE	FEBELCEM	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
ES	Oficemen	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
	CEOE	■ Yes	■ Yes	■ N/A	■ Yes	■ Other No formal position
CH	Cemsuisse	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
	Economiesuisse	■ Yes	■ Yes	■ N/A	■ Yes	■ Yes
DE	VDZ	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
AT	VOZ	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
PL	SPC	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
RO	CIROM	■ Yes	■ Yes	■ Yes	■ Yes	■ Yes
PH	CEMAP	■ Yes	■ Other No formal position	■ Other In progress	■ Other No formal position	■ Yes
MA	APC	■ Yes	■ Other No formal position due to special tax context in Morocco	■ Yes	■ Other No formal position	■ Yes
EG	ECA	■ Yes	■ Other No formal position	■ Other Work in progress	■ Yes	■ Yes
CH	BKS	■ Yes	■ Other No formal position	■ Yes	■ Yes	■ Yes
NL	Cement & Beton Centrum NL	■ Yes	■ Other No formal position	■ Yes	■ Yes	■ Yes
W	WGBC	■ Yes	■ Other No formal position	■ N/A	■ Yes	■ Yes
	IETA	■ Yes	■ Yes	■ N/A	■ Yes	■ Yes
	WEF	■ Yes	■ N/A	■ N/A	■ Yes	■ Yes
	WBCSD	■ Yes	■ Yes	■ N/A	■ Yes	■ Yes

Global Cement and Concrete Association (GCCA)

GCCA members represent 80% of global cement production capacity outside of China (as well as some key Chinese companies) who operate in almost every country of the world.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

The Global Cement and Concrete Association (GCCA) published in 2021 its 2050 Cement and Concrete Industry Roadmap for Net Zero Concrete. The roadmap sets out a net zero pathway to help limit global warming to 1.5°C, demonstrating how the industry can be fully decarbonised. A progress report was published in 2024 and is available on its website.

GCCA supports the use of carbon pricing mechanisms - this is articulated in the GCCA 2050 net zero roadmap and in more detail in the GCCA Policy Document on Carbon Pricing.

The GCCA recognises the role that technology and innovation will play in delivering deep industrial decarbonisation in the cement and concrete sector, including the scale-up and roll-out of CCUS technology. Innovation and technology is a key part of the GCCA advocacy mission. Innovandi is GCCA's innovation arm, running three world class innovation platforms to accelerate and foster innovation to support the industry decarbonisation.

GCCA welcomes the creation of market demand for low-carbon and near zero carbon construction and decarbonised value chains, and more specifically stimulation of demand for low-carbon and near zero cement and concrete products.

To learn more about GCCA Roadmap, please visit their website: <https://gccassociation.org/concretefuture/>

CEMBUREAU

The European Cement Association represents the cement industry in Europe. Its members are the national cement organisations.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

CEMBUREAU supports the implementation of EU climate policies elaborated to deliver on the Paris Agreement and reach 1.5°C target. In May 2024, the association published a new roadmap that is aligned with the 1.5° ambition. The industry's path to decarbonisation has been set out against the five C's of its value chain: clinker-cement-concrete-construction-carbonation. This modular approach allows to clearly identify the technology and business levers that allow for a CO₂ reduction at each stage of the value chain.

The organization supports the use of a global carbon mechanism or to have in place an effective carbon border adjustment mechanism, and it engages with EU stakeholders on a very frequent basis on climate policies and carbon pricing tools (EU ETS, carbon border adjustment mechanism, etc.).

Elaborating on the 5 'C's along the value chain, the 2050 carbon neutrality roadmap lays out the vision on how the cement-concrete industry can reach net zero by 2050. CCUS is identified as a key lever in the sector's carbon neutral roadmap and the creation of lead markets for low carbon and circular products is identified as one of the four major policy enablers for the realization of this roadmap.

To learn more about Cembureau Net-Zero roadmap, please visit their website: <https://www.cementeuropa.eu/resources/reports/cement-europe-s-net-zero-roadmap/>

Cement Concrete and Aggregates Australia (CCAA)

CCAA represents the heavy construction materials industry in Australia. Its' members operate cement & concrete plants, hard rocks quarries, and sand and gravel extraction operations.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Other*
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

*no formal position

CCAA is supportive of reducing the industry's carbon footprint and the Paris Agreement 1.5°C target. In 2021, the association declared its ambition to deliver net zero carbon cement and concrete to Australian society by 2050 and followed by publishing the Decarbonisation Pathways for the Australian Cement and Concrete Sector Report.

CCAA is actively involved in developing performance-based codes and standards for cement, concrete, new clinker efficient cements, supplementary cementitious materials and concrete construction technology that will help stimulate innovation and support the introduction of new low-carbon technologies.

Holcim does not directly produce cement in Australia and therefore does not actively participate in advocacy activities in relation to carbon pricing. It is done through the Cement Industry Federation, which Holcim Australia is not a member of. CCAA recognizes that CCUS will be necessary to decarbonize the industry as indicated in the Industry Pathways Report. CCAA is active in promoting the use of EPDs and supports Whole-of-Life (LCA) Carbon analysis.

Learn more about Australia's Cement and Concrete industry ambitions towards net-zero 2025: https://www.ccaa.com.au/CCAA/CCAA/Public_Content/SUSTAINABILITY/Climate_Ambition_Statement.aspx?hkey=55062c4b-0c47-4682-abbe-7b001d9797bd

Concrete New Zealand

Members of ConcreteNZ are the Cement and Concrete Association of NZ (CCANZ), Precast NZ (PCNZ), the NZ Ready Mixed Concrete Association (NZRMCA), the NZ Concrete Masonry Association (NZCMA), the NZ Concrete Society and the NZ Portland Cement Association (NZPCA).

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

Concrete New Zealand supports New Zealand's Climate Change Response (Zero Carbon) Amendment Act, and its objective to ensure New Zealand plays its part in reducing Greenhouse Gas Emissions (GHG) under the Paris Agreement.

Concrete NZ states that the concrete industry is fully committed to becoming net carbon neutral by the Government's target date of 2050. It has developed a vision up to 2030 to reduce direct and electricity-related emissions by 44 % vs. 2020 and is reporting on the progress as part of annual industry-wide Sustainability Reports.

Concrete NZ is supportive of the country's Emissions Trading Scheme as one of the policy tools to deliver on the climate ambitions. The organisation supports the assessment of advanced technologies in New Zealand, such as CCUS. Concrete NZ is active in promoting low carbon products on the market, via building regulations, promotion of life cycle analysis (LCA) for buildings and EPDs.

The organisation recognises that the climate and biodiversity crises are two sides of the same coin and is actively promoting concrete's credentials as low-biodiversity-impact building materials.

For more information about the Roadmap to Net-Zero Carbon for New Zealand's Concrete Industry, please visit their website: https://concretenz.org.nz/page/2050_roadmap

Mineral Products Association (MPA)

MPA is the UK industry trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

The Mineral Products Association (MPA) considers the Paris Agreement net-zero agenda a key strategic priority and supports the UK government's target of net zero emissions by 2050. The organization has developed and published in November 2020 a comprehensive roadmap which sets a pathway to delivering a net zero cement and concrete industry by 2050.

MPA supports the use of carbon pricing as a policy tool and welcomes the UK Government commitment to fund CCUS projects. The association is active in supporting those projects as CCUS is identified as one of the levers of the 2050 roadmap.

The organization strongly backs the recommendation to support whole life carbon assessments and to drive demand for low carbon cement and concrete, through public procurement and more widely across the construction sector.

To learn more about MPA's beyond Net Zero strategy, please visit their website: https://www.mineralproducts.org/MPA/media/root/Publications/2020/MPA-UKC-Roadmap-to-Beyond-Net-Zero_Oct20.pdf

France Ciment

France Ciment represents the cement industry players in France.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

France Ciment engages on a regular basis with policy makers on climate policy and is committed to reducing the industry's carbon emissions. The organization also supports CEMBUREAU's policy approach on carbon pricing mechanisms (ETS, CBAM). In 2023, France Ciment updated the cement industry decarbonization roadmap to reach a 50% reduction of the CO₂ emissions in 2030 compared to 2015.

France Ciment is active in promoting breakthrough technologies such as CCUS for hard-to-abate process emissions and is heavily involved in standardization works, both at the French and the European level, in cement and concrete, to adapt the framework to low-carbon solutions.

The organization also promotes innovative partnerships through the CementLab, to have a fruitful dialogue between start-ups, academics and companies. France Ciment engages with public authorities on reducing carbon emissions down the value chain and promotes low-carbon solutions, including through public procurement and norms.

To learn more about France Ciment decarbonization pillars and roadmap, please visit: <https://www.france-ciment.fr/enjeux/decarbonation/>

FEBELCEM

Febelcem represents the cement industry in Belgium.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

Febelcem is committed to reducing the sector's impact on climate and fully supports Paris Agreement Targets.

The organization fully supports the CEMBUREAU 2050 carbon neutrality roadmap and has published its own roadmap in May 2021. The update of the Roadmap is expected in early 2025 and defines targets for 2040. Three main levers are identified to achieve the carbon neutrality targets: increased use of alternative Supplementary cementitious Materials and decarbonisation of the electricity supply (cement lever), further use of alternative raw materials, fuels and improved thermal efficiency of the clinker production (clinker lever) and CCUS.

FEBELCEM is extremely proactive with Regional authorities to accelerate the development of a backbone for CO₂ transport and has a leading role in federating its members as well as federations from other sectors with hard-to-abate emissions like the lime production. FEBELCEM plays also a critical role in the promotion of low-carbon cement and concrete as well as circular construction practices and promotes the application of full life cycle assessments via the Belgian tool TOTEM, which enables the calculation of the environmental impact of construction.

To learn more about Febelcem 2050 roadmap, please visit their website: https://febelcem.be/app/uploads/2025/11/Roadmap-2025-11_FR.pdf

Oficemen

Oficemen represents all companies devoted to the production of cement and that have manufacturing plants in Spain.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

After its' roadmap published in December 2020 and describing the path to net zero by 2050 along the value chain, Oficemen has updated this roadmap in 2024. The new roadmap is aligned with the Paris Agreement 1.5°C and is much aligned with the CEMBUREAU roadmap and features levers along the '5 C's (clinker, cement, concrete, construction and re-carbonation).

In the roadmap, CCUS is identified among the levers to reduce carbon emissions for the industry. Oficemen is collaborating with several Ministries promoting green public tenders as the support of low-carbon products is identified as one of the key enablers in the roadmap. This emphasizes on the role of public procurement and on focusing on the sustainability properties of construction materials. Oficemen is active in supporting the implementation of a carbon border adjustment mechanism in the EU.

To learn more about Oficemen new roadmap, please visit here: https://www.ieca.es/wp-content/uploads/2024/12/Hoja-de-ruta-delcemento_2024_version-8.pdf

CEOE

The CEOE represents the interests of Spanish businesses before the Government, State bodies, trade union organizations, political parties and international institutions. It brings together more than 200 organisations in all productive sectors and all territories of the country.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ N/A
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Other*

*no formal position

CEOE stands fully behind the goals of the Paris Agreement and the EU's climate neutrality target for 2050. The organisation advocates for the use of an effective carbon pricing mechanism and calls on the EU to continue to rely on measures to counteract carbon leakage, such as the Carbon Border Adjustment Mechanism. The organisation details its position on CBAM in its position paper on The Clean Industrial Deal in February 2025, explaining how it can be further improved.

CEOE actively advocates to incentivize the scale-up and deployment of technologies that enable emission reductions in hard-to-abate sector; such as Carbon Capture, Storage, and Utilization (CCUS), emphasizing that these technologies are essential for achieving the EU's climate targets, particularly in industrial sectors such as steel, cement, and chemicals, where process emissions cannot be eliminated through electrification or renewable energy.

The association is an active advocate in the field of circular economy and promotion of circular products, however, it does not yet have a public formal position on the need to introduce low carbon and net zero products on the market. As a multi-sectorial organization, CEOE did not develop net zero roadmap as it does not apply.

Cemsuisse

Cemsuisse represents the cement industry in Switzerland.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

Cemsuisse supports Switzerland's climate commitments and the Paris Agreement. The association published its climate roadmap in 2021 and published the necessary framework conditions in a further report in 2023.

In its position on the Paris Agreement and on how to implement the Agreement in Switzerland, Cemsuisse supports the need to include the built-environment as part of the CO₂ law.

Cemsuisse supported and continues to support market-based carbon pricing tools and was politically very active for implementing the Swiss ETS and its linking to the EU ETS. Cemsuisse acknowledges that, to further reduce process emissions, the industry will need technologies such as carbon capture and storage. Promotion and advocacy for Low-carbon products is also identified as a key lever to reduce emissions.

To learn more about Cemsuisse 2050 roadmap, please visit: https://www.cemsuisse.ch/app/uploads/2021/04/Cemsuisse_Roadmap_210422.pdf

Economiesuisse

Economiesuisse represents the interests of the competitive, internationally networked and responsible Swiss business community.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ N/A
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

Economiesuisse supports Switzerland's climate goals and policies to reduce carbon emissions. The organization has been supportive of the Paris agreement since its existence and committed in December 2020 to reach carbon neutrality by 2050. This commitment doesn't entail a roadmap (complex given its sector-wide scope) but identifies policy levers to achieve this ambition.

The organization is also working on identifying actions that will support this ambition, including CCUS. Economiesuisse called for a global carbon price, to ensure comparable climate policy conditions around the world. The organization supports the development of a regulatory framework that incentivizes the uptake of low-carbon solutions.

Verein Deutscher Zementwerke (VDZ)

VDZ represents both economic policy and technical/scientific interest groups in the German cement industry.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

VDZ has taken clear commitments to reduce the climate impact of the industry. In November 2020, the VDZ published its roadmap "Decarbonising Cement and Concrete: A CO₂ Roadmap for the German cement industry", which includes a scenario for the industry to reach net zero by 2050. The roadmap details the technology mix that will be needed to reach carbon neutrality and CCUS is identified in this scenario.

In 2024 VDZ issued a study on a CO₂ infrastructure which is needed to connect CO₂ sources from hard to abate sectors like the cement industry with relevant storage sites. Regarding markets and low-carbon products, the VDZ is active to underline the need for low-carbon products, and that a suitable political framework will be necessary to allow a market to develop for low-carbon cement and concrete. VDZ is supportive of carbon pricing tools.

From 2025 VDZ will host a label on low emission cements which will be the base for appropriate carbon pricing, particularly in public procurement. The label is developed based on the methodology suggest be the G7 states and the IEA and is in accordance with the GCCA model on low carbon cement and concrete.

To learn more about VDZ decarbonization pathway and action strategies, please visit here: <https://www.vdz-online.de/wissensportal/publikationen/dekarbonisierung-von-zement-und-beton-minderungspfade-und-handlungsstrategien>

Vereinigung der Österreichischen Zementindustrie (VOZ)

VOZ represents the Austrian cement players.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

The Vereinigung der Österreichischen Zementindustrie (VÖZ) is supportive of the goal of the EU to become carbon neutral by 2050. The VÖZ endorsed the CEMBUREAU 2050 carbon neutrality roadmap and issued its own 2050 roadmap in May 2022.

The Austrian cement industry is committed to decarbonize and has one of the highest fuel substitution rates and the lowest CO₂ emissions per ton of cement compared to other European countries. With clear milestones 2030, 2040 and 2050 the members of the association are committed to reducing CO₂ emissions.

The VÖZ is supportive of CEMBUREAU's carbon pricing positions, such as the carbon pricing border mechanism project. The organization is also active in promoting CCUS pilot projects, such as the C2PAT project (Holcim Austria is part of the project). VÖZ is also active in promoting low-carbon solutions, including through the development of EPDs.

To learn more about VOZ net_zero roadmap, please visit:
<https://zement.at/publikationen/co2-roadmap/>

Stowarzyszenie Producentów Cementu (SPC)

SPC represents the cement industry in Poland.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

The Cement Producers Association (SPC) actively supports the development of climate policy and promotes the cement industry's actions aimed at significantly reducing carbon dioxide emissions. SPC, as a member of the European organization CEMBUREAU, played a key role in developing the carbon neutrality plan by 2050, which it not only supported but also translated into Polish to increase awareness and commitment at the national level.

The organization promotes the introduction of effective carbon pricing mechanisms, supports the development of advanced technologies such as carbon capture, use and storage (CCUS), and promotes markets for products with a low carbon footprint. At the same time, SPC emphasizes Poland's leading position in the use of alternative fuels, which currently cover over 70% of energy demand in clinker production, which is one of the highest results in Europe.

SPC's activities also include intensifying investments in the development of low-emission cement production technologies and renewable energy. In this regard, the organization calls for regulatory support to promote green public procurement, encourage the use of sustainable building materials, and introduce tax relief for investors implementing low-emission projects.

To learn more about SPC commitment to decarbonization and net-zero roadmap, please visit:
<https://www.polskicement.pl/spajamy-europejski-zielony-lad-roadmap-2050/>

CIROM

CIROM represents cement industry players in Romania.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

CIROM is fully endorsing the European industry commitments and positions on net-zero ambitions and targets. The organisation actively contributes at the national level to the development of National Romanian climate and industrial policies and strategies, such as 'The Long Term Decarbonisation Strategy'; facilitating the deployment of the decarbonisation in the cement industry and the achievement of a carbon neutral, circular and competitive economy in Romania.

CIROM cannot develop its own roadmap due to the limited competition environment in Romania and in alignment with competition rules. The organization, however, is fully aligned with Cembureau Roadmap as reference and has developed a high level roadmap for decarbonizing cement and lime industry in collaboration with the Energy Policy Group.

The organisation is supporting the carbon pricing (EU-ETS and CBAM) mechanisms, the creation of level playing field and is actively contributing to shaping such mechanisms with focus on Romanian authorities, business environment and stakeholders, as well as on the European level.

CIROM actively contributes to shaping climate framework in ways that recognize and incentivize scaling up the development and deployment of new advanced technologies and low-carbon and circular products at the national level. CIROM messages and positions were successfully taken up by authorities and think tanks.

The publication of the high level roadmap - as an EPG policy paper:
<https://www.epg-thinktank.org/high-level-roadmap-for-decarbonising-cement-and-lime-production-in-romania/>

Cement Manufacturers Association of the Philippines (CEMAP)

CEMAP represents the cement industry in the Philippines.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Other*
Existence of a net-zero roadmap (for industry associations)	■ Other**
Acknowledge the need of advanced technologies, including CCUS	■ Other*
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

*no formal position **work in progress

The organization has expressed its support for the adoption of Carbon Pricing Mechanisms as provided under a new National Bill introduced in July 2025 at the lower house of Philippine Congress. CEMAP recognizes carbon pricing as a key policy instrument that can help drive emissions reductions across hard-to-abate sectors, including cement, while encouraging investments in low-carbon technologies and practices.

With respect to the industry's net-zero transition, CEMAP is currently collaborating with the European Cement Research Academy (ECRA) in the development of a comprehensive decarbonization roadmap for the Philippine cement sector. This initiative aims to align local industry pathways with international best practices, scientific benchmarks, and emerging technologies, rather than issuing a standalone net-zero roadmap at this stage. The outcome of this work is expected throughout 2026.

CEMAP likewise acknowledges the critical role of advanced technologies—particularly Carbon Capture, Utilization, and Storage (CCUS)—in achieving deep emissions reductions over the long term. However, while these technologies are recognized as necessary components of the transition, the organization has yet to formalize its position through an official policy or position paper.

Association Professionnelle des Cimentiers (APC)

APC represents the cement players in Morocco.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Other*
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Other**
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

*no formal position due to special tax context in Morocco **no formal position

APC supports the Paris Agreement principles and has developed the industry decarbonisation roadmap in 2024 in collaboration with GCCA, EBIRD and EY. The industry roadmap has been communicated to the relevant ministries and Cement decarbonisation is now integrated in the Morocco National Decarbonisation Roadmap.

The organisation is not opposing to the carbon pricing principles, however, the organisation advocates for a repurposing of the existing taxes in order to serve a robust carbon pricing mechanism.

Despite the existence of CCUS projects in Morocco, the association is not directly involved and does not actively advocate for those technologies. However, APC is actively advocating for low carbon products and contributed to the new Moroccan norms for low carbon cement LC3 to be produced in Morocco as well as higher use of recycled materials in Concrete. These norms were finalised and issued in 2025.

Egyptian Cement Association (ECA)

The Egyptian Cement Association represents the cement players in Egypt.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Other*
Existence of a net-zero roadmap (for industry associations)	■ Other**
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

*no formal position **work in progress

The Egyptian Cement Association (ECA) is fully supportive of the Paris agreement and is committed to the decarbonization of the industry. The organisation is currently working on a decarbonisation pathway as part of a larger scheme which is the 'National Decarbonization Roadmap' that will include several heavy industries such as Cement, Iron and Steel, Aluminium and fertilisers.

The organisation is also part of a new national initiative around carbon credits, however, it doesn't have a formal position on carbon pricing as a national regulatory framework is yet to be designed.

The ECA is very supportive to new advanced technologies and collaborates with universities and R&D centers in Egypt and abroad in order to promote the use of new technologies in the cement industry.

ECA is also continuously advocating for the standardization of new low-carbon cement produced in Egypt through its tight collaboration with the concerned authorities.

Baustoff Kreislauf Schweiz

Swiss association regrouping Concrete, Aggregates and Recycling companies and focusing on circular construction. The new association created in May 2024 is the merger between two associations (FKSB, Concrete and Aggregates companies) and (Baustoffrecycling Schweiz, Recycling companies).

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Other*
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

*no formal position

BKS supports the Paris Agreement and published its decarbonization roadmap in July 2025. The roadmap aims at reducing the CO₂ footprint of the Concrete, Aggregates and Recycling activities and provides a catalog of measures to decarbonize. The association is currently seeking to support companies in implementing the measures. BKS did not adopt a formal position about carbon pricing due to the lack of political debate in Switzerland about adjusting the CO₂-tax.

BKS is member in various expert committees engaging with the government and standards organisations to promote low-carbon and circular products. The organisation is involved in the development of legislations to enable the transition to circular and low-carbon economy like the Swiss Circular Economy Act. BKS is also working with the Federal Construction Products Commission as well as the UEPG (EU AGG Producers) Recycling Commission.

The organisation supports the creation of federal funds dedicated to innovative technological solutions, is advocating for new technologies (such as CO₂ sequestration and storage in concrete) and is actively involved in adapting standards to enable new innovations through its' internal expert commissions.

White paper on net-zero roadmap can be found here: www.baustoffkreislauf.ch/assets/publikationen_und_produkte/feuille-de-route-de-la-branche-fr-2025.pdf

Cement & Beton Centrum NL

Cement&BetonCentrum is a trade association for the cement industry in the Netherlands. It represent the interests of the industry and coordinates promotional activities of four affiliated cement companies with a commercial interest in the Dutch market.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Other*
Existence of a net-zero roadmap (for industry associations)	■ Yes
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

*no formal position

Cement and Beton Centrum Netherlands fully supports the Paris agreement and has developed a net-zero roadmap for the cement and concrete industry. The roadmap outlines all the reduction initiatives of the cement industry in the Netherlands, describes the estimated emission reductions of adjacent sectors in the concrete supply chain and provides a realistic picture of the emission reductions that can be achieved by 2030, 2040 and 2050.

The cement used in the Netherlands and the Portland cement clinker imported for grinding come primarily from Germany and Belgium. The Netherlands possesses the lowest Clinker Factor in Europe, with an average of 51%. CO₂ emissions in the concrete supply chain in 2030 is expected to decrease with up to 50%. The association, hence, fully supports the need to promote and incentivize low carbon products on the market.

The association recognizes the role of advanced technologies such as CCUS in order to reach CO₂ neutrality. The association does not currently have a formal position on carbon pricing as it is a non clinker producing country and clinker is imported from neighbouring countries.

For more information about Netherlands Net-zero roadmap, please visit: <https://cementenbeton.nl/co2-roadmap-cement-en-beton-in-nederland/>

World Green Building Council (WGBC)

WGBC is a local-regional-global action network accelerating sustainability in the Built Environment.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Other*
Existence of a net-zero roadmap (for industry associations)	■ N/A
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

*no formal position

The World Green Building Council (WorldGBC) is a local-regional-global action network, driving the sustainable transformation towards a decarbonised and resilient built environment. The organisation is working hand in hand with businesses and governments to deliver on the ambitions of the Paris Agreement, with main goal for all buildings to be totally decarbonised across their whole lifecycle and that their performance is annually measured and verified.

WorldGBC did not work explicitly on carbon pricing but it advocates for financial and fiscal mechanisms that can support industries in their transition to decarbonise.

As a multisectorial organization, WorldGBC doesn't have its own roadmap, however, it supports its' members to develop their net-zero roadmaps: In Europe, through the BuildingLife project, WGBC has supported the development of 12 national roadmaps.

The organization is technology neutral but recognises the need for new technologies and is actively supporting the deployment of innovation funding in Europe via its' partnership in Horizon Europe. WorldGBC actively advocates for the development of policy, codes and standards that encourage the uptake of circular and low carbon construction products, and is active in many coalitions and networks to facilitate the work on these products.

To learn more about the organization projects, please visit their website: <https://worldgbc.org/>

Industrial Emissions Trading Association (IETA)

IETA is a non-profit organisation representing 330 companies across 8 sectors and 6 continents committed to smart, well-designed and effective carbon markets to help achieve the goals of the Paris Agreement and reach net-zero emissions by 2050.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ N/A
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

The International Emissions Trading Association (IETA) strongly supports the goals of the Paris Agreement, including limiting global warming to 1.5°C and advocates for the development of climate and industrial policies aligned with this ambition. As a multisectorial organisation, IETA does not have its own net-zero roadmap.

Through active engagement in shaping Article 6 of the Paris Agreement and promoting carbon markets, IETA has publicly expressed its commitment to accelerating the transition to a low-carbon economy consistent with 1.5°C pathways. The organization emphasizes that carbon pricing mechanisms are central to driving this transition by embedding carbon costs throughout entire value chains.

To learn more about IETA activities, please visit their website: <https://www.ieta.org/>

IETA advocates for well-designed pricing systems that incentivize the competitiveness of low-carbon solutions while fostering innovation and investment in sustainable practices.

The organization also recognizes the critical role of advanced technologies, such as Carbon Capture, Utilization, and Storage (CCUS), in achieving the 1.5°C ambition of the Paris Agreement. Through its CDR-CCUS Working Group, IETA facilitates discussions and knowledge sharing to advance CO₂ removals and CCUS.

The organization also supports the development of lead markets for circular and low-carbon solutions and materials to complete market-based mechanisms that drive emissions reductions.

World Economic Forum (WEF)

WEF is an International Impartial not-for-profit Organization aiming to foster Public-Private Dialogue and Cooperation with the mission of improving the state of the world.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ N/A
Existence of a net-zero roadmap (for industry associations)	■ N/A
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

The World Economic Forum supports Paris Agreement objectives and drives initiatives such as; the WEF Alliance of CEO Climate Leaders and the First Movers Coalition in order to mobilize its members to steer change and to achieve climate goals.

The WEF Alliance of CEO Climate Leaders is a CEO-led community composed of more than 130 climate leaders in 27 countries and is dedicated to implementing actions to reach net-zero emissions on a 1.5°C-aligned pathway. The alliance sets a high bar on climate actions for members and holds them accountable in the hopes of aligning with a 1.5 degree pathway.

The alliance also participates actively in corporate climate advocacy to shape a global enabling environment by jointly connecting the world business leaders with policymakers.

The First Movers Coalition (FMC) is a global coalition of companies leveraging their purchasing power to decarbonize the world's heavy-emitting sectors. FMC translates member commitments into a credible green demand signal, pushing the low-carbon and net zero products on the markets. The organisation is not involved in Carbon Pricing Mechanisms and cannot develop a net-zero roadmap as it covers a wide range of industries.

To learn more about WEF climate action, please visit their website: <https://www.weforum.org/stories/climate-action/>

World Business Council for Sustainable Development (WBCSD)

WBCSD is a business organisation grouping more than 230 world-leading organizations from wide range of sectors with the aim of leading together step-by-step transformations driving towards a net-zero, nature-positive and a just future.

Supports Paris Agreement and net-zero agenda	■ Yes
Supports the use of Carbon Pricing Mechanisms	■ Yes
Existence of a net-zero roadmap (for industry associations)	■ N/A
Acknowledge the need of advanced technologies, including CCUS	■ Yes
Supports the need to introduce low-carbon and/or net-zero products on the market	■ Yes

WBCSD fully supports the Paris Agreement and Net-Zero agenda as the organisation's climate action imperative is centered around the 1.5°C scenario principle. WBCSD believes that achieving this goal will require a rapid transformation of systems to decarbonize and that the private sector has a crucial role in the process.

WBCSD mobilizes its members to create the scale needed to transform their businesses and value chains to achieve Net Zero by 2050. One of the organisation's core climate action workstreams, is the Built Environment Decarbonization - designed as a collaborative platform and aiming to halve emissions from the built environment by 2030 and fully decarbonize it by 2050.

The organisation is also leading The Market Transformation Action Agenda (MTAA) that outlines a collective roadmap for built environment stakeholders. In its' MTAA, WBCSD to a) adopt a whole life-cycle approach to assessing greenhouse gas (GHG) emissions from buildings from materials manufacturing to the demolition phase, b) integrate the carbon cost and reflect it in the price of products and services and c) incentivize low-carbon solutions and technologies and create low-carbon demand.

To learn more about the Built Environment Decarbonization, please visit their website: <https://www.wbcscd.org/actions/built-environment-decarbonization/>

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