ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

INTRODUCTION AND SCOPE

Introduction
We commit to support and enable the healthy growth of communities in which we operate. Abiding by the rule of law and setting an example on how to conduct ethical business is one way for us to put this commitment into action. Bribery undermines the operation of free markets, dilutes public trust in business and government and is deemed a crime in virtually all countries around the world.

Prosecutors aggressively investigate suspected violations, while convictions lead to large financial penalties and/or imprisonment. Obviously, the publicity and negative perceptions that attach to a company that engages in corrupt practices tarnishes its reputation.

At Holcim we believe in the following principles:

- All professionals – in business and in government – are expected to perform their duties objectively.
- We do not accept anything of value that might affect our objectivity in doing our jobs. Likewise, we do not bribe anyone for any reason.
- Every Employee should exercise good judgment to ensure that our interactions with all Third Parties – whether private business partners or Public Officials – are performed with integrity to maintain trust and respect with all our stakeholders.

Bribery can take a variety of forms – offering or giving money or anything of value to a person that influences or affects our business can be a bribe. In fact, even common business practices or social activities, such as the provision of Gifts and Hospitality, can constitute bribes in some circumstances.

This Anti-Bribery and Corruption (ABC) Policy sets out the relevant principles for appropriate business conduct and related rules when interacting with Third Parties whether Public Officials or commercial parties. It defines who should be considered a Public Official, what activities are never permitted and the types of situations requiring due care, prior review and authorization.

Scope
This ABC Policy applies worldwide to all companies controlled by Holcim, and to all their Directors and Employees of Holcim (as defined in Annex 2). For Employees who work with consultants, lobbyists, tax advisors or other Third Parties that interact with Public Officials, you must apply due diligence standards in accordance with the Third-Party Due Diligence Directive. Holcim applies good faith efforts to implement this Policy or similar standards in affiliated companies over which it has no control.

POLICY PRINCIPLES

Introduction Staying Away from Bribery and Corruption
To be sure you stay away from bribery or corruption, never offer, promise or give anything of value in order to influence someone's professional objectivity for the benefit of yourself or Holcim. Equally, never request or accept anything of value that might influence your objectivity in doing your job.

Holcim may be held accountable not only for acts of bribery or corruption by its employees but also by those acting for or on behalf of Holcim. So, when using Third Parties for legitimate reasons, it is crucial to ensure that such Third Parties apply the same standards as those that Holcim uses itself.

Good judgment is key. Always ask yourself, before offering or giving money or anything else of value to any person, whether or not what you are considering doing could be viewed as having a wrongful purpose. If the answer is yes, you must not proceed. Things of value that could be perceived as bribery or corruption can take many forms. The most common ones include actual or promised:

- Monetary payments, contributions or kickbacks
- Gifts, Entertainment and Hospitality (e.g. meals, lodging or transportation)
- Preferential treatment, favors or Undue Advantages
- Free education or training, and
- Discounted or free products or services.

Below is specific guidance you need to follow in order to avoid bribery and corruption when you interact directly or indirectly with Public Officials and business partners.

Small Payments to Expedite Routine Actions by Public Officials

Never offer or make small, unofficial payments – commonly called “grease”, “speed” or “facilitation” payments - to secure or expedite a routine action by a Public Official. If a Public Official requests such payment, refuse even if there would be negative business consequences. If you face such situations, the Compliance Department can help. See Section ‘Seeking Advice, Review and Approval’ for the appropriate contact person.

Official expediting payments pursuant to a written regulation and for which you get an official receipt from the governmental authority are permissible.

Payments in Situations of Imminent Health or Safety Threats

The company expects that you use good judgment and make best efforts to utilize appropriate resistance protocols if you are asked for an improper payment. If you feel, however, that there is an imminent risk to your health or safety you may make such payments. If a payment is made under these emergency circumstances, you must immediately report it to your supervisor, your Local Compliance Officer and properly document it in accordance with Section ‘Record Keeping and Recording’ below.

Gifts, Hospitality and Entertainment

Providing or receiving reasonable Gifts, Hospitality and Entertainment is often an appropriate way to reflect esteem or gratitude or to build stronger business relationships. Nonetheless, Gifts, Hospitality and Entertainment require careful considerations to ensure that they are consistent with the law and our standards of conduct.

In particular, Gifts, Hospitality and Entertainment:

- must be modest, reasonable and infrequent insofar as any individual recipient is concerned, and
- are never permitted, regardless of the amount, if they are in cash or could be perceived as trying to influence the recipient’s professional objectivity, or if they are of bad taste, sexually oriented or could embarrass the recipient or Holcim.

Before offering, promising or receiving any Gifts, Hospitality or Entertainment you must ensure to comply with the Gift, Entertainment and Hospitality Directive as published and amended from time to time.

Preferences, Favors or Undue Advantages
Never offer, promise, make, accept or ask for any preferences, favors or other Undue Advantages that could influence or appear to influence your or the recipient's professional objectivity.

Examples of such advantages include: a grant of a free or advantageous loan, provision of educational support, hiring a Public Official's or customer procurement officer's relative as an Employee or intern or a promise of a future employment opportunity.

Third Parties Interacting with Public Officials
The Company may be liable for acts of bribery or corruption by Third Parties whilst interacting with Public Officials for our account or on our behalf. Examples of such Third Parties can include government relations consultants, immigration consultants, lawyers, tax advisors, technical consultants, customs brokers, security services providers, logistics services providers, large equipment providers and resellers.

Before hiring or renewing the engagement of a Third Party that you expect to interact with Public Officials on our behalf you must:

- follow applicable procurement processes;
- conduct due diligence as set forth in the Third-Party Due Diligence Directive;
- sign a written contract that clearly defines the scope of services, invoicing requirements, anti-bribery standards, authorization requirements for Gifts, Hospitality and Entertainment to Public Officials on Holcim's behalf, and a clause allowing termination for non-compliance; and
- ensure payments to the Third Party are made only with proof of services rendered, in the same country where services are rendered and at a price that is considered market.

If you manage a relationship with a Third Party that interacts with Public Officials on our behalf, you need to exercise due care to ensure that all relevant Third-Party personnel understand Holcim requirements and how those requirements apply to their activities.

EXAMPLES OF BUSINESS INTERACTIONS REQUIRING DUE CARE

There are other common business practices or social activities in which Employees or Third Parties may engage for our account or on our behalf that require particular care.

Lobbyists and Political Advisors
Holcim regularly engages Public Officials in order to inform or shape policy debate and to assist Public Officials in their decision-making processes on issues of relevance to Holcim.

We are committed to dealing transparently and fairly in all of our lobbying activities and we comply with all laws and regulations related to such activities. The requirements set forth in section "Preferences, Favors or Undue Advantages' apply.

Expected behavior for both Employees and Third Parties when engaging in lobbying or other public advocacy work on behalf of Holcim can be found in the Responsible Lobbying Directive.

Corporate Social Responsibility Projects, Sponsorships and Donations
Support of Corporate Social Responsibility (CSR) projects and the use of Sponsorships and Donations (collectively "contributions"), are part of our contribution to the wellbeing of the communities and the environment in which we operate. Such contributions, however, can never be promised, offered or made to secure a business advantage or for any other improper purpose such as to bribe or self-enrich.

Before offering, promising or making any contribution to CSR projects, a Sponsorship or a Donation you must ensure the contribution complies with the CSR projects, and with the Strategic Social Investment, Charitable Sponsorships and Donations Directive.

Political Donations and Contributions Involving or Connected with Public Officials
In general, Holcim does not make donations to any political party, politician, elected official or candidate for office. Examples of prohibited political donations include:

- cash contributions
- free or discounted use of Holcim premises, equipment or other company resources; and
- payment of salary of a Holcim Employee working for a political party or candidate working during normal working hours (except if the Employee in question takes a legally permissible paid leave).

Other forms of contributions involving or connected with Public Officials or political parties are allowed only if permissible under written law and after prior review and approval as set forth in section 'Seeking Advice, Review and Approval'.

Hiring Current or Former Public Officials or His/Her Relatives
When employing or engaging a current or former Public Official or his/her Relatives as an Employee, board member or contractor/supplier, particular care needs to be exercised to prevent any actual or perceived corruption, conflict of interest or other wrongdoing in connection with such appointment.

In particular, any such relationship needs to be consistent with local written law. Furthermore, as with all hires, our hiring standards, qualification requirements, fair market remuneration principles and mandatory conditions, like individual compliance declarations and acceptance of Holcim Code of Ethics, must be applied and clearly documented.

Participations in Organizations
Corrupt dealings by trade associations and other organizations of which Holcim is a member can harm our reputation and expose us to liability. For example, if Holcim is a financial contributor or an Employee(s) sit(s) on the board of an organization, corrupt dealings by the organization might implicate Holcim. Care should be paid to trade associations who may deal or lobby on behalf of its members with Public Officials.
Before committing Holcim as a member or to renew its membership in an organization that interacts with Public Officials, as part of its purpose, you must comply with due diligence requirements as set out in the Third-Party Due Diligence Directive.

SEEKING ADVICE, REVIEW AND APPROVAL

Request for Advice, Review and Approval
Requests for advice, review and approval in relation to the ABC Policy must be submitted to your Local Compliance Officer. If no Local Compliance Officer, you should escalate your request to the Regional Compliance Officer and, if none in place, to the Chief Compliance Officer.

In addition to the specific review and approval requirements mentioned in prior sections, if you have any doubt whether or not a particular transaction may be regarded as a bribe, corruption or an improper advantage, you must seek prior advice and approval from your Local Compliance Officer or, if none, as per the escalation described in paragraph above.

RECORD KEEPING AND RECORDING

Interacting with Public Officials
Any payment, Gift, Hospitality or Entertainment in relation to an interaction with a Public Official, whether made by Holcim or a Third Party interacting for our account or on our behalf, must be identifiable and properly recorded and documented.

Reporting
If anyone has asked you, directly or indirectly, to make a payment or confer an advantage to anyone in violation of this Policy, it is your duty to immediately report this to your Local Compliance Officer. If no Local Compliance Officer, you should report this event to the Regional Compliance Officer and, if none in place, to the Chief Compliance Officer. Alternatively, you may report the same via the Integrity Line.

EXCEPTIONS AND MODIFICATIONS

Requests for Exception
In the unlikely situation where an exception or modification to the principles set out in this Policy would be required, the request for exception must be made in good faith and submitted in writing (incl. email) to the Chief Compliance Officer.

HOW YOU WILL BE TRAINED ON THIS TOPIC

Training Requirements
ABC principles are specifically covered in the Holcim Code of Ethics, which is applicable to all Employees. Certain Employees identified as Medium or High Exposed ABC Employees have additional training requirements (e-learning and face-to-face training) as determined by Group Compliance from time to time. Training must be provided by a member of the Compliance Function or an Employee that has received the appropriate training as documented by a train-the-trainer certification on this topic.

DEFINITIONS AND ABBREVIATIONS

Term/Abbreviation	Definition
ABC	Ant-Bribery and Anti-Corruption.
CSR Projects	Long term projects aiming to improve people's living conditions in a sustainable way and focusing on the needs of the communities where Holcim operates. These projects are coordinated and implemented in collaboration between Holcim and an institution or organization and Holcim does not receive or expect to receive a business or financial advantage in return.
Director	Member of the Holcim board of directors and any Group Company board of directors (including executive and non-executive directors) or, in Group Companies applying a two-tier board system, any member of the supervisory board.
Donations	Donations are voluntary one-off contributions to an institution or organization where Holcim does not receive or expects to receive anything in

	return. Donations can be monetary or in-kind support, such as the supply of material.
Employee	All officers and Employees of Holcim, including interns, temporary workers, contract workers and anyone over whom Holcim could reasonably be expected to exert control in the way the person completes his or her work.
Entertainment	Refers to the provisions to a Third Party of an opportunity to participate in an event or an activity such as a show, a performance or a game. To be considered as Entertainment, the provider must be present during the event or activity otherwise this is a Gift and must be treated as such.
Gift	See definition of Hospitality and Entertainment.
Government Instrumentality	Any government-controlled entity including universities, hospitals and commercial enterprises. An entity is government-controlled if a government (a) owns or controls 50% or more of the entity's shares or (b) can otherwise direct the management, policies or affairs of that entity.
High Exposed ABC Employees	All EXCO members and all Employees in N-1 and N-2 positions (where N is the CEO). Heads and direct reports of the following functions: Finance, Procurement, CAPEX, Trading, Regulatory/Quality, Government Relations, Geocycle (AFR), IT, Strategy/ M&A, Communications, Commercial/ Sales, Growth & Innovation/Marketing, Performance & Cost, HR, Sustainable Development, Environment and plant management. All Legal/Compliance, Internal Audit and Internal Control Employees.
Hospitality and Entertainment	Refers to the provision to a Third Party of travel, transportation, lodging or entertainment it also includes and/or a meal when offered as part of, or alongside, an entertainment, or other similar forms of treatment towards Third Parties. To be considered as Hospitality or Entertainment, the provider must be present otherwise this is a gift and must be treated as such.
Holcim	Holcim Ltd and all of its consolidated affiliates from time to time.
Lobbyists and Political Advisors	Individual or company having direct or indirect communications with Public Officials to influence policies, laws, programs, standards or positions. May conduct or policy related actions or other official acts or advise Holcim on such topics.
Local Compliance Officer	Formally appointed Compliance Officer responsible for the defined geography.
Medium Exposed ABC Employees	All Employees in addition to High Exposed ABC Employees who have the potential to interact with public officials or participate in business negotiations (with commercial discretion) with private business partners on behalf of the Group Company.
Public International Organization	An organization whose members are countries, governments or other Public International Organizations.

Public Officials	Any officer, Employee or person acting on behalf of (a) a government, its department, agency or Government Instrumentality or (b) a Public International Organization. The term also includes political party officials and candidates for political office as well as family members of any of the above.
Relatives	Refers to (a) immediate family members i.e. spouse, partner, girlfriend/boyfriend, parents and grandparents, children and stepchildren, siblings, mother-, father-, brothers- and sisters-in-law, and (b) other close relationships such as close friends or partners.
Sponsorships	Involve a monetary or in-kind contribution to a charity or not-for- profit organization in return for the on-going rights to associate with an activity, item, person, organization or property or in exchange for building reputation.
Undue Advantage	Refers to something to which the company or person concerned is not clearly or legally entitled, such as an operating permit for a factory which fails to meet statutory requirements.

DOCUMENT CONTROL	
Approved by	Group Legal and Compliance
Related Policies, Directives and MCS	Code of Ethics Conflict of Interest Directive SpeakUp and Investigations Directive Third Party Due Diligence Directive Strategic Social Investment, Charitable Sponsorships and Donations Directive Code of Ethics for Suppliers Gifts, Hospitality, Entertainment and Travel Directive Responsible Lobbying Directive Group Delegated Authorities Minimum Control Standards Framework
Other supporting documents	

VERSION CONTROL			
Version Number	Issuance Date	Author	Summary of Changes
Version 0.0	August 3, 2016	Group Legal and Compliance	Original.
Version 1.0	July 1, 2021	Group Legal and Compliance	Periodic review and format changes.
Version 2.0	October 1, 2023	Group Legal and Compliance	Periodic review and format changes.
Version 3.0	August 1, 2026	Group Legal and Compliance	Periodic review and format changes.

ANNEX 1

Responsibilities

All Employees at Corporate and Country level must adhere to the principles set out in this Policy and the related Directives at all times.