

NATURE POLICY

SCOPE AND OBJECTIVE

At Holcim, nature is at the core of our sustainability strategy. We believe businesses have an active role to play in providing solutions for nature. Recognizing our industry's dependence on natural resources, we are accelerating the deployment of sustainable building solutions that bring nature into cities to contribute to a nature-positive future.

The Holcim Nature Policy (the "Policy") applies to Holcim Ltd and its affiliates in our managed and consolidated countries ("Holcim"). We also expect suppliers to adhere to the selected principle contained within this Policy (amongst other requirements). It describes our approach towards the efficient use of natural resources and our path towards a nature-positive future.

The Policy's main purpose is to set out the company's objective to protect and restore water and biodiversity. This Policy is publicly available and subject to regular review.

OUR COMMITMENTS TO WATER

Holcim is committed to responsibly managing water resources by reducing withdrawals and returning water at equal or better quality across its operations. We practice water stewardship both within our operations and in collaboration with relevant stakeholders, benefiting communities and nature.

Water is essential for our operations and its availability is strongly affected by local conditions and climate change. In order to prioritize our actions and design tailored water solutions, we perform a water risk assessment at each of our sites annually.

Holcim's water commitments that are contributing towards our nature-positive journey focus on three main areas:

- **Freshwater use reduction:** We improve our water usage efficiency by optimizing our on-site water processes, maximizing rainwater harvested and shifting our water usage from freshwater to non-freshwater (e.g. sea and saline water, wastewater from municipal or industrial sources). We are committed to reducing our specific freshwater withdrawal across all Cement, Aggregate and Ready-Mix Concrete sites.
- **Strict water quality standard:** We require all sites to implement rigorous water discharge standards, ensuring compliance with either Holcim's global requirements or local regulations, whichever are more stringent.
- **Freshwater ecosystem restoration:** We implement nature-based solutions outside our site boundaries to restore ecosystems through partnerships and collaborations.

OUR COMMITMENTS TO BIODIVERSITY

Holcim is committed to making a measurable positive impact on biodiversity in our active and non-active quarries by implementing targeted biodiversity actions, deploying science-based monitoring indicators, helping to reverse nature loss, protecting natural ecosystems and improving the livelihoods of neighboring communities.

Our operations are strongly linked to natural resources and our business plays a key role in tackling biodiversity loss and degradation. In order to prioritize actions and develop tailored solutions to local challenges, we assess the biodiversity importance of each of our extraction sites and we apply the mitigation hierarchy in our activities. Also, as per our Quarry Rehabilitation and Biodiversity Directive, Holcim commits not to open new sites or explore within protected areas declared under World Heritage, International Union for the Conservation of Nature (IUCN) I and III. We work in partnership with relevant stakeholders who understand local ecosystems, ensuring a positive contribution to biodiversity and communities.

Holcim recognizes the positive role nature plays in the built environment beyond our operations. We deploy nature-positive solutions such as Hydromedia and green roof systems for more liveable urban environments to address societal challenges such as ecosystem degradation, biodiversity loss and climate change.

Holcim's biodiversity commitments towards a nature-positive future focus on five main areas:

- **Progressive and transformative rehabilitation:** We commit to perform progressive rehabilitation alongside the extraction activities whenever possible. We promote and deploy transformative rehabilitation practices that aim at increasing the biodiversity value of rehabilitated areas by capitalizing on natural processes, endemic species and local adaptation. We commit to have Quarry Rehabilitation Plans in place in all of our quarries and, in the high biodiversity value ones, to have Biodiversity Management Plans.
- **Rigorous biodiversity measurement and monitoring:** We commit to assess our biodiversity level in all of our active and non-active quarries and to demonstrate a positive impact by applying the Biodiversity Indicator Reporting System (BIRS) developed in partnership with the IUCN.
- **Increasing circularity:** We commit to building cities from cities, helping preserve and protect our ecosystems. Scaling circular construction is a key lever to decouple our growth from virgin material use, cutting down on raw material extraction and minimizing landfill waste.
- **Landscape approach:** We commit to participate in and lead multi-stakeholder collaboration with all relevant parties from industrial sites to our suppliers and local communities. Our quarries and sites are an integral part of wider landscapes, which play an essential role in providing ecosystem services to people, as well as being the habitat of wildlife and flora.
- **Supply chain:** We commit to work with all our suppliers identified as having a high environmental impact to demonstrate continuous improvement towards having a recognized environmental management system in place. Suppliers are requested to systematically manage their environmental impacts with respect, but not limited to: climate and energy, water, waste, chemicals, air quality and biodiversity and set objectives and targets to reduce such impacts.

POLICY PRINCIPLES

The main principle of this Policy is the delivery of our actions in a rigorous, science-based manner, minimizing our impact on the environment and developing products and solutions to give back to nature more than we take. In this way we progressively move towards a nature-positive future. Our commitments are translated into targets and clear actions to drive performance within and beyond our operations. We comply with local, state, federal and national regulations in all our operations and we advocate for collective actions with relevant stakeholders.

Our water and biodiversity commitments are aligned with the principles, values and targets included in the United Nations Sustainable Development Goals (SDGs) and the Kunming-Montreal Global Biodiversity Framework. This Policy and related directives and Minimum Control Standards listed below support these commitments.

We clearly and actively communicate our expectations to our suppliers through our Code of Ethics for Suppliers. We engage transparently with our stakeholders and communicate openly our performance and improvement initiatives with consistent and relevant key messages. We cooperate pro-actively and transparently with legislators and regulators in relation to new regulations and standards.

OPERATIONAL REQUIREMENTS

We have identified the following operational requirements:

- **Water:** Each site must comply with the principles and guidelines delineated in the Water Directive and Water Management Standards.
- **Biodiversity:** Each quarry must comply with the principles and guidelines outlined in the Quarry Rehabilitation and Biodiversity Directive.
- **Supplier Due Diligence:** Each country procurement must identify environmental impact in their supply chain and ensure a proper due diligence is conducted with suppliers in scope, in line with Holcim Sustainable Procurement Directive and Sustainable Procurement Management Standard.

MONITORING AND REPORTING

We pursue the highest level of transparency with regards to nature-related financial disclosures aligned with relevant frameworks such as the European Sustainability Reporting Standards (ESRS) and the Taskforce on Nature-related Financial Disclosures (TNFD), and have included nature related risks and opportunities in our Enterprise Risk Management process. We measure our nature dependencies, impacts, risks and opportunities and disclose them on a yearly basis.

RESPONSIBILITIES

The Holcim Board of Directors, through its Health, Safety and Sustainability Committee (HSSC), is responsible for overseeing the company's nature strategy, approving long-term targets, and reviewing nature-related risks and performance annually.

The Chief Sustainability and People Officer of Holcim is the designated owner of this policy and is responsible for its implementation, monitoring, and reporting to the Board's HSSC; chief executive officers

and executive committees in countries where we operate have the responsibility and accountability for the implementation of this Policy in their respective operations.

The original version of this Policy was approved by the Holcim Executive Committee on June 2nd, 2022 and is effective from June 30th, 2022.

DEFINITIONS AND ABBREVIATIONS

Term/Abbreviation	Definition
BIRS	Biodiversity Indicator Reporting System
ESRS	European Sustainability Reporting Standards
HSSC	Health, Safety and Sustainability Committee
IUCN	International Union for Conservation of Nature
SDG	Sustainable Development Goal
TNFD	Task Force on Nature-related Financial Disclosures

DOCUMENT CONTROL

Approved by	Vice President Sustainability Chief People and Sustainability Officer
Related Policies, Directives and MCS	Climate Policy Circular Construction Policy Human Rights and Social Policy Procurement Policy Holcim Code of Ethics for Suppliers Quarry Rehabilitation and Biodiversity Directive Carbon Credit Directive Water Directive Human Rights Directive Sustainable Procurement Directive MCS 17, MCS 61, MCS 62, MCS 63
Other supporting documents	

VERSION CONTROL

Version Number	Issuance Date	Author	Summary of Changes
Version 1.0	June 10, 2022	Renata Pollini, Gloria Fontana (Sustainability)	Original version.

Version 2.0	February 27, 2026	Renata Pollini, Sajith Mohideen (Sustainability)	Updated and aligned with NextGen Growth Strategy 2030.
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