

## HOLCIM WHISTLEBLOWING AND REPORTING

### DATA PRIVACY NOTICE

This Holcim Whistleblowing and Reporting Data Protection Notice (the “**Notice**”) informs you (the “**Reporter**”) about how and for which purposes we will process your personal data in the context of the whistleblowing procedure when using Holcim’s Integrity Line Platform (the “**Platform**”) for filling a report of a suspected misconduct related to potential breaches of applicable laws, the Holcim Code of Business Conduct and other Holcim policies and directives, and explain your rights under applicable personal data protection laws.

We are strongly dedicated to always handling your personal data responsibly, diligently and in compliance with all legal requirements. State-of-the-art professional standards will be applied to protect the integrity and security of your personal data.

#### **WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?**

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We, **Holcim Group Services Ltd, Grafenauweg 10, 6300 Zug, Switzerland** and the Holcim legal entity in relation to which you are making the report (the “**Company**” and “**We**”) will be the responsible controller for any personal data you provide to us in the context of the whistleblowing procedure by using the Platform.

In addition, Holcim affiliates other than the Company (acting in their capacity as controllers or joint controllers, as applicable) may process your personal data to the extent they are required or permitted by applicable law, including on the grounds of the Company’s and their legitimate interests.

#### **WHICH PERSONAL DATA DO WE COLLECT?**

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The Platform offers the possibility of submitting anonymous reports (i.e., without disclosing the identity of the Reporter, when anonymous reporting is allowed in the country of the Reporter) of suspected misconduct related to potential breaches of applicable laws, the Holcim Code of Business Conduct and other Holcim policies and directives. When you follow the Platform’s instructions to submit a report, you will not be asked for your personal data. However, it will be difficult or even impossible to investigate the report without having sufficient information on the reported misconduct.

- **Data subjects concerned**

We collect personal data about:

- The persons who make a report;
- The persons who are mentioned in, or subject to a report; and
- Other persons that may be later related to the report, during the process of our review.

## **Categories of personal data**

The personal data the Company collects depends on the concern raised and the necessary steps to investigate, act and resolve the report. It may include your first and last name, position, e-mail address, phone number, country of residence as well as any of your personal data included in the supporting documents that may be attached to the report, where applicable. If you submit your report by phone, we may also access

We may also collect your personal data, or personal data of persons that you disclose in the report, in the course of, or in connection with, compliance investigations on the reported misconduct, where applicable.

Additionally, personal data included in any subsequent document drawn up in response to that initial report and within the investigation process may be processed.

**IMPORTANT:** Please note that special categories of personal data (i.e. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) may be also be processed when filing a report, to the extent such data are strictly necessary in the context of the reported issues (e.g. a report regarding a suspected discriminatory behavior on religious grounds).

## **HOW DO WE COLLECT PERSONAL DATA?**

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Where provided, we will collect your personal data primarily directly from you when you interact with us in the context of the whistleblowing procedure, e.g. when you use the Platform (via the internet or a mobile application) and communicate with us in relation to our whistleblowing procedure, or when you submit a report by phone. In this case, a transcript is generated and provided to us for further review and investigation.

In addition, we will generate personal data about you while investigating the reported issues.

Furthermore, we may collect personal data about you indirectly, from internal or external resources, e.g. HR, Internal Audit or Internal Control, the Platform, web-based data, commercial registries (e.g. commercial and land registers), third parties assisting the Company in the investigation process or open-source publications.

The personal data will be available on the Platform operated by **People Intouch B.V.**, acting in their capacity as data processor by reference to the purposes described below. You can find the data protection policy of the data processor in the link [here](#), or by accessing the Platform and following the link found there.

**FOR WHICH PURPOSES DO WE PROCESS PERSONAL DATA?**

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When we collect personal data, we process your personal data to make misconduct reporting possible. In particular, we collect personal data:

- To ensure organizational compliance, in particular monitoring and assessing compliance with the Holcim Code of Business Conduct, policies, and standards;
- To process your report and take any actions necessary, as foreseen in the relevant Company policy and procedures;
- To allow the designated investigators to communicate with you (anonymously, where applicable), as necessary, update you, and further investigate the issues you reported;
- To comply with applicable laws and regulations; and
- To take any actions necessary to protect you, other Company employees, and the Company and its affiliates, depending on the nature, severity, and danger of the reported misconduct.

• **Grounds for processing**

We will process your personal data, and the personal data of other persons mentioned in your report, when processing is necessary due to a relevant legal requirement, and the Company is required to comply with its legal obligations.

We will also do so, when the Company has a legitimate interest to investigate your report in order to provide an effective and secure method for reporting concerns and suspected misconduct related to potential breaches of applicable laws, the Holcim Code of Business Conduct and other Holcim policies and directives and conducting investigation of the reported issues in a professional, fair and independent manner, where applicable) or those of any third party recipients that receive your personal data, always provided that such

**WHERE DO WE PROCESS PERSONAL DATA?**

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We will store and process your personal data within the European Union and the European Economic Area.

We may store and process your personal data, or share it with the recipients described below, also outside of the European Union. We will do so only to the extent permitted by applicable law and take appropriate safeguards to ensure the security and integrity of your personal data. You may contact us anytime using the contact details below if you would like further information on such safeguards.

## **WHO DO WE SHARE PERSONAL DATA WITH?**

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The Company may share personal data with its affiliates where, acting in their capacity as controllers or joint controllers, as applicable, an affiliate may process your personal data to the extent required or permitted by law.

We may also instruct service providers (e.g. a cloud provider), domestically or abroad, to process personal data on the Company's behalf and in accordance with our instructions; our service providers may in turn share personal data with their service providers, only in accordance with our instructions.

We will retain control over your personal data and will remain fully responsible to you when engaging service providers.

Otherwise, no third party will have access to the personal data related to your report unless there is legal obligation, or you give us permission to do so.

## **HOW LONG DO WE STORE PERSONAL DATA?**

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We will hold personal data included in your report as long as necessary for organizational compliance, in particular monitoring and assessing compliance with our policies, directives and standards. We may also be required to keep certain personal data for certain retention periods under applicable law.

Personal data will be promptly deleted when it is no longer required for these purposes.

## **YOUR RIGHTS**

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You have the right to request from us access to, rectification or erasure of your personal data, or restriction of processing concerning you, and to object to processing as well as the right to data portability in accordance with applicable personal data protection laws.

You have the right to request a copy of the personal data that we hold about you. If you use this service repeatedly, we may make a small charge for this. If you would like to transfer your personal data to another controller, we will provide you with the personal data which you provided to us and which has been processed by automated means in a machine readable portable format free of charge.

As we want to make sure that your personal data is accurate and up to date you may also ask us to correct or remove any information which you think is inaccurate.

For any of the above requests, please send a description of your personal data concerned and state name, email address, and proof of identity (e.g. passport or national ID copy) to [privacy@holcim.com](mailto:privacy@holcim.com). We may require additional proof of identity to protect your personal data against unauthorized access.

If you have any concerns about how your personal data is handled by us or wish to raise a complaint on how we have handled your personal data, you can contact us at [privacy@holcim.com](mailto:privacy@holcim.com) to have the matter investigated.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the competent data protection supervisory authority in your country.

## **CHANGES TO THIS NOTICE**

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This Data Privacy Notice was last updated in June 2024. From time to time, we may make changes or amend it, in line with changes to applicable data protection laws or changes to our policies, procedures and standards. You may wish to check back from time to time. Any amended Notice will apply from the date it is posted on our website.