

Directive Responsible Lobbying and Advocacy



November 10, 2025

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Summary

Sponsor / Owner	Chief People and Sustainability Officer
Content of this Directive	Holcim’s lobbying and advocacy approach Rules and requirements to be followed when engaging with external parties
Primary Audience	Country CEOs, Global Public Affairs Network, related functions (Legal and Compliance, Sustainability)
Implementation Responsible	Country CEOs (country level), Group Head of Functions (corporate level) engaging in lobbying and advocacy activities
Contact for support	Cédric De Meeus Noura Tantawy

1. Scope and Objective

This Responsible Lobbying and Advocacy Directive (the Directive) applies worldwide to all companies controlled by Holcim. Holcim applies good faith efforts to implement this Directive or similar standards in companies over which it has no control. Holcim regularly engages with public authorities in order to inform policy debate and to assist public authorities in their decision-making processes on regulatory issues of relevance to Holcim.

2. Holcim Commitments

2.1 Commitment to Climate

Holcim is committed to align its climate targets and actions with the international Paris Agreement 1.5°C framework. This commitment is translated into climate policy advocacy priorities and approaches that are in line with the Paris Agreement principles and that support the industry transition to low-carbon, circular and energy efficient solutions. As part of its decarbonisation pathway, Holcim is committed to respecting Human Rights principles and the Just Transition principles, thereby assessing and addressing the impacts on key stakeholder groups, including our people, suppliers, communities and customers.

2.2 Commitment to Transparency

Holcim commits to dealing transparently and fairly in all its lobbying and advocacy activities and complies with all laws and regulations related to such activities. Similarly, the principles of this Directive will be applied to all third parties engaging in advocacy or lobbying activities on behalf of Holcim, including trade associations. The Directive is made available to all third parties on the company's website. Where applicable and relevant, Holcim climate advocacy activities are disclosed in transparency registries such as the EU Transparency Register.

2.3 Commitment to Trade Associations Climate Advocacy Alignment

Holcim commits to take steps to ensure that the trade associations, alliances and coalitions of which it is a member conduct their climate related advocacy in line with the Paris Agreement and Holcim's Climate Policy Engagement Positions. In this context, Holcim commits to conducting a periodic review of the key strategic organizations to which it belongs, according to a clear and transparent methodology that takes into account Holcim's priority policies and engagements (see section 3.1 for more details).

3. Rules and Requirements

3.1 Transparency and Disclosure

- Holcim is committed to:
 - Giving reliable, constructive and up-to-date information to public authorities through publicly available information on its website, media releases, integrated annual reports and other official communications.
 - Adhering to public codes of conduct and lobbying transparency registers, where those exist.
 - Ensuring its employees and relevant third-parties disclose to public authorities that they are acting on behalf of, or in the name of Holcim.

- Holcim's Public Policy Positions are transparent and publicly available on its website. Group Public Policy Positions can be explicitly found in the Annual Climate Policy Engagement Report with examples of advocacy activities, and are also part of Holcim's Annual Integrated Report.
- Engagement with trade associations and industry coalitions are conducted in full respect of applicable competition laws and regulations and, where needed, documented through agendas and minutes of meetings.

Trade Associations Review

Holcim is committed to ensure that indirect advocacy through trade associations is aligned with the Paris Agreement and Holcim's positions. For this reason, Holcim conducts an annual trade association review and follow-up. The review is articulated around Holcim's priority climate advocacy areas and covers key strategic organizations of which Holcim is a member and that are present in its key markets. The review follows a specific and transparent internal methodology that is detailed in the Trade Associations Review Report.

Country teams are required to identify strategic trade associations and other organisations based on their level of influence on the climate policy agenda, and to work hand-in-hand with the corporate team when such reviews are undertaken, according to the methodologies put in place and information requested.

Where a material misalignment is found, the local team is required to work closely with the targeted organization to find alignment. In extreme cases, where alignment cannot be reached, an escalation process takes place by referring the matter to the local management team, in collaboration with the Group Public Policy and Government Relations function.

3.2 Integrity

Holcim:

- Prohibits any form of bribery or corruption by its employees and third parties acting on its behalf, in accordance with the Holcim Anti-Bribery and Corruption Policy and the Code of Ethics.
- Does not use any improper, fraudulent or dishonest means to obtain information or decisions.
- Acts in accordance with the Fair Competition Directive and does not engage in discussions or behaviors that could violate applicable competition laws and regulations.
- Remains politically neutral and does not make political donations unless expressly permitted under written local laws and applicable Holcim policies and guidelines, and provided such donations are transparently and accurately recorded, in accordance with the Strategic Social Investment, Charitable Sponsorships and Donations Directive.
- Selects third parties that act on its behalf to support its lobbying activities only after appropriate due diligence has been carried out and the necessary internal approvals have been obtained consistent with the Third Party Due Diligence Directive.
- Ensures that actual and potential conflicts of interest in lobbying activities are identified and actively addressed by line management consistent with the Conflict of Interest Directive.
- Is committed to acting promptly to correct any misinformation that may occur.

3.3 Required Group Approvals

Screening and approval of local trade associations is the responsibility of Country CEOs. However, Specific Lobbying Agreements (SLAs)* require the review and validation of Head of Region, Group Head of Public Policy and Government Relations and Group Head of Legal and Compliance according to the Group Delegation of Authority Policy.

**SLA: Third-party lobbying agreements (excluding industry trade associations) to represent Holcim before public authorities on policy-related matters.*

4. Governance: Oversight and Implementation

4.1 Oversight and update of this Directive

Holcim's Chief People and Sustainability Officer has the overall responsibility for the Responsible Lobbying and Advocacy Directive; while Executive Committees in countries where Holcim operates are accountable for assessing and ensuring compliance with responsible lobbying and advocacy rules and requirements. Periodic update and dissemination of this Directive is the responsibility of the Group Public Policy and Government Relations function.

4.2 Implementation of this Directive

4.2.1 Responsibility of Implementation

The implementation of this Directive is the responsibility of Country CEOs (at country level) and Group Head of functions (at corporate level). Country CEOs or Group Head of functions must:

- Ensure all lobbying or advocacy activities respect the rules and requirements in this Directive and, when necessary, require clearance from the Group Head of Public Policy and Government Relations and / or other Group relevant functions (e.g. Sustainable Development and/or Legal and Compliance).
- Secure that all third party consultants and trade associations engaged to perform lobbying or advocacy on behalf of Holcim are screened in accordance with the Third Party Due Diligence Directive and briefed on this Directive.
- Wherever applicable, make sure to subscribe into national / subnational transparency registers and adhere to national transparency rules.

4.2.2 Support and training

- Relevant employees who are engaging with public authorities and / or involved in collaboration with trade associations and other lobbying and advocacy channels receive regular compliance training as defined in the Compliance Training Cycle instructions and in the Fair Competition Directive (involving but not limited to anti-bribery and corruption and Fair Competition training).
- Local teams and relevant Group functions are supported by:
 - Global networks, such as the Global and EU Public Affairs Networks, through which the Group Public Policy and Government Relations function shares relevant responsible policy engagement updates, as well as trade associations' climate policy position principles for alignment (indirect policy engagement).
 - Group public policy engagement resources such as the Group's Climate Public Policy Positions, the Climate Policy Engagement Report, and the Trade Associations Climate Policy Alignment Review, which are publicly available on the company's website and on the Group Public Policy and Government Relations function intranet page, and are periodically updated.
 - The Group Public Policy and Government Relations function, to equip local officers with the necessary guidance, training, and tools to support the conduct of trade associations alignment reviews according to the specific Group methodology.

Employees who have questions or are uncertain about their obligations regarding any lobbying and advocacy activities can reach out to their supervisors, or contact their local Legal and Compliance Officers, Group Compliance, or Group Public Policy and Government Relations for guidance.

Where new lobbying activities are planned in countries, consultation with Country Legal and Compliance is required before initiating any such program. This ensures that appropriate controls, contractual structures, and safeguards are in place to protect both the company and individual employees.

Document Control			
Approved by:	Responsible Group Executive Committee Member: Chief People and Sustainability Officer - Carmen Diaz Canabal		
Related Policy, Directives and MCS	Code of Ethics Compliance Policy Group Delegated Authorities Anti-Bribery and Corruption Policy Climate Policy Fair Competition Directive Strategic Social Investment, Charitable Sponsorships Donations Directive Gifts, Hospitality, Entertainment and Travel Directive Third Party Due Diligence Directive Conflict of Interest Directive MCS 1: Communication and promotion of the Code of Ethics and SpeakUp culture MCS 2: Compliance with Fair Competition laws and requirements MCS 3: Related party transactions and conflict of interest MCS 30: Supplier qualification and performance evaluation MCS 62: Social impact: human rights and stakeholders		
Version control			
Version Number	Date Issued	Author	Update information
Version 1	May 30th, 2016	Connie Qiu	
Version 2	May 13th, 2020	Cédric De Meeus Elodie Woillez	
Version 3	November 10th, 2025	Cédric De Meeus Noura Tantawy	Comprehensive update of the Responsible Lobbying and Advocacy Directive, strengthening commitments to climate, transparency, and governance, and introducing clearer rules, approval processes and oversight mechanisms across all areas of application.