

At Holcim, everyone should feel comfortable to speak up and ask questions or report concerns. Employees should also feel confident that reports will be managed in a fair and consistent manner.

We strongly encourage you to report violations of the Holcim Code of Business Conduct, policies, or directives or any other breaches of law directly to your supervisor, Human Resources, Legal, or Compliance personnel.

The *new* **Integrity Line**, an ethics advice and reporting system covering all Holcim Group entities, does not replace but complements the existing possibilities to talk to these functions and raise your concerns or ask a question.

Integrity Line is accessible to you to ask questions or make a report.

Doing business with integrity is the Holcim way.

If you have a question, or need to raise a concern regarding Holcim business practices, speak to your supervisor, HR, Legal, or Compliance colleagues.

And if you don't feel comfortable doing that, use the Holcim Integrity Line.

00800 733 255
Identifier Code: 77084

Holcim Group Services Ltd
Group Compliance
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Switzerland

group-compliance@holcim.com

**YOUR
SAFE
WAY TO
SPEAK UP**

Our confidential

Integrity Line

00800 733 255
Identifier Code: 77084

If you have concerns that something isn't right, you can raise an issue with your line manager, HR, Legal or Business Integrity manager or if you prefer, you can call our Integrity Line: 00800 733 255
Identifier Code: 77084



How to ask a question or make a report through the Integrity Line

Integrity Line is supported by an external, independent provider and available 24 hours a day, seven days a week, and gives you the choice between a phone and online reporting service:



Access the web-based reporting platform at <https://integrity.holcim.com>



Call the toll free phone line at 0800 733 255
Identifier Code: 77084

Please note that the Integrity Line is not an emergency service. In case of an immediate threat to life, health, or property, please contact the local police, fire department, or ambulance service.

What can be reported

The types of reports that can be made via the Holcim Integrity Line include breaches of law or the Holcim Code of Business Conduct, policies, or directives, unless otherwise restricted by data privacy laws in your country. The Integrity Line phone service and web page will indicate if any restrictions apply to your country. Categories of permissible reports generally include:

Abusive Labor/Employment Practices

Bribery, Corruption & Kickbacks

Competition Law Issues

Conflicts of Interest

Environmental Violations

Falsification of Company Records

Financial Irregularities

Human Rights Violations Health and Safety Violations

Release of Confidential Information

Retaliation Against Whistleblowers

Trade violations, Sanctions and Embargoes

Who can make a report

All Holcim employees worldwide. The Integrity Line is a Holcim Group internal reporting system.

How reporters are protected

1. Confidentiality

Holcim will take all reasonable steps to keep your identity and your report confidential at all stages of the process. The secure Integrity Line platform is supported by an independent service provider. If you reveal your identity when making a report, your information may only be disclosed on a strictly need-to-know basis to selected people involved in any investigation or subsequent judicial proceedings started as a result of your report.

2. Protection of Anonymity

Holcim encourages you to disclose your identity and to share a phone number or email address, so that someone from Holcim Group Compliance or a designated person can contact you directly and discuss the case further if needed. If allowed by law, and you choose to report on the Integrity Line anonymously, your report cannot be traced back to you.

3. Protection from Retaliation

Holcim strictly prohibits acts of retaliation against employees who have made a report or participated in an investigation in good faith. Reporting in good faith means that you have provided all of the information you have, and you believe it to be true.

What happens to reports

All reports are read by a team of Holcim compliance and investigation experts at Group Compliance in Zug, who apply the following professional standards:

- We only deal with allegations that are sufficiently plausible and relate to Holcim.
- Any fact-finding exercise will be objective and balanced. This means that we will focus both on facts that support an allegation as well as facts that speak against it.

- Like in all our processes we strive to act with utmost professionalism and consistency.
- Information about the allegations and the fact-finding will be treated confidentially and only shared on a strict need-to-know basis. That's why we may not be able to inform a reporter about the outcome of the investigation.
- All involved employees have the opportunity to respond to any allegations against them before a final report or recommendation is issued.
- We do not tolerate investigation measures or techniques that might harm fairness and trust between Holcim and its employees.
- We have a transparent, consistent and professional disciplinary process in case of proven violations of the Code of Business Conduct.

Where to find more information

If you want to learn more about the Holcim Integrity Line, how your personal data may be processed, and your protection when making a report:

- Check the Holcim Group Compliance Intranet site to access more information, including the Holcim Compliance Reporting Directive
- Access the Q & A section on the Integrity Line website
- Contact Group Legal & Compliance in Zug, Switzerland
- See your local information or notice board or whiteboard for country-specific details
- Contact your local legal/compliance colleagues