RESPONSIBLE SOURCING

THE HOLCIM CODE OF ETHICS FOR SUPPLIERS

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HOLCIM

Introduction

Holcim is committed to being the leading partner for sustainable construction.

Sustainable development – value creation, environmental performance, and respect for human and labour rights – are integral to our business strategy.

Our approach to sustainable development includes how we work with our Suppliers.

Sustainable procurement at Holcim is based on the standards and principles enshrined in the UN Global Compact Ten Principles, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the international Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the International Code of Conduct Association for Private Security Services. We integrate sustainable development into our procurement strategy, day-to-day operations and relationships with Suppliers.

All Holcim group companies are required to identify, prevent and manage risks pertaining to Climate Change, Health, Safety and Environment (HSE), Security and Resilience (S & R), Social Responsibility, Human Rights, Business Ethics and Legal and Compliance in their supply chain. Relevant Holcim policies and directives are available on the Holcim Website, under ESG resource page.

All Holcim Suppliers are required to adhere to the standards described in this document and to apply the same principles in their supply chain.

RELATED LINKS

- Sustainable Supply Chain
- ESG Policies, Documents and Reports

Key Principles and our Commitment to Suppliers

COMPLIANCE

Holcim supports legally compliant business practices - this is a minimum requirement for anything we do.

We are committed to preventing any breaches of applicable laws and regulations, policies and directives. We adhere to the commitments we make in this Code.

When carrying out procurement duties, all Holcim employees are expected to share with Suppliers the company's commitments and key principles established in this Code.

FAIRNESS

Holcim advocates open markets and fair competition for the benefit of our customers and suppliers.

We are committed to acting with transparency and fairness when we compete for business and act on the market.

Holcim has established methodologies to manage each procurement category and to guide relationships with suppliers, ensuring a fair, competitive and transparent negotiation process in line with this Code.

CARE

Our purpose is building progress for people and the planet. Being a core part of the built environment, our products must impact the entire value chain in a positive way to ensure a safe and sustainable future.

We are committed to increasing our positive contributions to society and nature.

These commitments are reflected in every purchasing decision and contractual terms and conditions.

TRUST

Trust is built over time through consistent behavior. It can vanish in an instant.

We are committed to building trust with our stakeholders and to safeguarding the assets, interests and reputation of Holcim.

These commitments also apply on the way we work with our suppliers

RESPECT

People are at the heart of Holcim and our success — our employees, customers, business partners and many more people around the world whose lives we improve with our products and solutions.

We are committed to respecting and promoting human and labor rights in our operations, business relationships and in the communities where we work. Respect for human rights is fundamental to the way we work.

These commitments also apply to our suppliers and all workers in the value chain.

Terms of Engagement

This Code of Ethics applies to all Holcim Suppliers and it is communicated to potential and existing Suppliers.

All Holcim Suppliers, prioritized based on the potential Environment, Social, Governance, Health and Safety impact related to the goods and services provided, are required to demonstrate compliance to the standards described in this document (in their operation and their supply chain) by taking part in the supplier qualification process.

THE SUPPLIER QUALIFICATION PROCESS

- Consists of regular risk and performance evaluation in the form of third party due diligence, self-assessments, fact finding or audits, according to Holcim standards and as determined by local procurement function.
- Holcim provides guidelines to Suppliers on how to meet our expectations and on how Suppliers will be evaluated.
- When a Supplier does not meet Holcim's requirements, corrective action plans must be established within a specified timeframe (depending on the severity of the issue) and Holcim will monitor progress.
- Holcim may support Suppliers in developing their capabilities and improving their performance.
- Holcim may immediately terminate the relationship with Suppliers that breach "zero tolerance" requirements and/or suppliers that repeatedly and knowingly violate the Code or refuse to implement improvement plans. During the tendering process Holcim reserves the right to exclude Suppliers that are not compliant with local, national or international laws and regulations or who do not fulfill the expected requirements listed in this document.

OUR EXPECTATIONS OF SUPPLIERS

COMPLIANCE

Holcim supports legally compliant business practices - this is a minimum requirement for anything we do.

We are committed to preventing any breaches of applicable laws and regulations, policies and directives. We adhere to the commitments we make in this Code.

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08 Bribery and Corruption →

09 Sanctions and Embargoes →

Holcim is committed to meeting high social, human rights, environmental, health, safety and security standards and we expect our Suppliers to do likewise.

Regulatory Requirements

Holcim supports legally compliant business practices - this is a minimum requirement for doing business with us. We are committed to preventing any breaches of applicable laws and regulations.

Regulatory requirements are legally binding rules or guidelines set by government agencies or regulatory bodies to ensure a business or individual complies with specific standards in their industry or sector.

Regulatory requirements are not just suggestions; they are laws and rules that must be followed to avoid penalties or legal consequences.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers must comply with local and national laws and regulations to conduct their business. Furthermore, we expect Suppliers to adhere to environmental, social and other regulatory requirements on all levels (local, national and international).
- In particular for the Environment, in all their activities, Suppliers shall be covered by required environmental permits, licenses, land rights, and support a precautionary approach to environmental challenges.
- In particular for Health and Safety, Suppliers must be compliant with local and national laws and regulations on occupational Health and Safety, and have the required permits, licenses and permissions granted by local and national authorities.

Bribery and Corruption

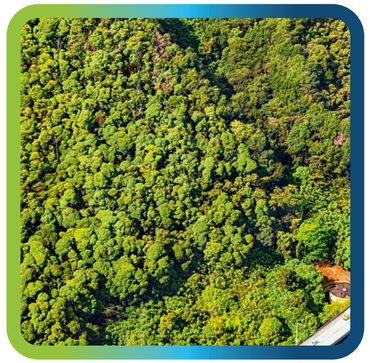
Bribery and corruption harm communities and create inequality. These activities are criminal offences in all our operating countries and damage trust in governments and business. Abiding by the rule of law is fundamental to how we operate globally.

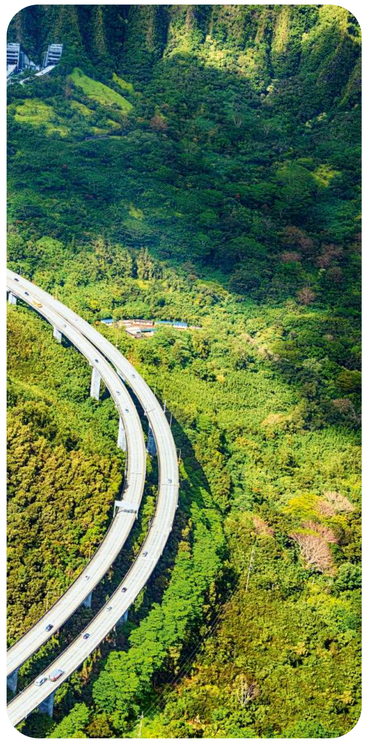
Bribery occurs when something is offered or promised in order to exert undue influence. Corruption occurs when someone abuse their position to gain an unfair advantage. Bribery and corruption can take many forms, including embezzlement, fraud and extortion.

The involvement of businesses in bribery and corruption is often characterized by fictitious contracts or accounting fraud to disguise a bribe or create a slush fund for illicit use.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall comply with all applicable anti-corruption laws and regulations and, to this effect, have a zero tolerance policy towards any form of bribery, corruption, extortion and embezzlement.
- In particular, Suppliers and their extended supply chain, shall not pay bribes or make any other inducement (including kickbacks, facilitation payments, excessive gifts and hospitality, grants or donations) in relation to their business dealings with customers, suppliers, public officials and any other stakeholder.
- Suppliers are expected to perform all business dealings transparently and these dealings shall be accurately reflected on their business books and records.
- Violations of anti-bribery laws and regulations constitute Zero Tolerance Breaches.





Sanctions and Embargoes

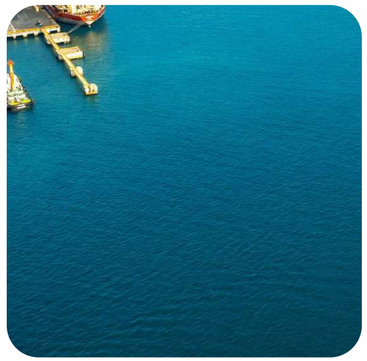
Global companies like Holcim face significant challenges due to trade sanctions, embargoes, and export controls. Violations can carry severe consequences.

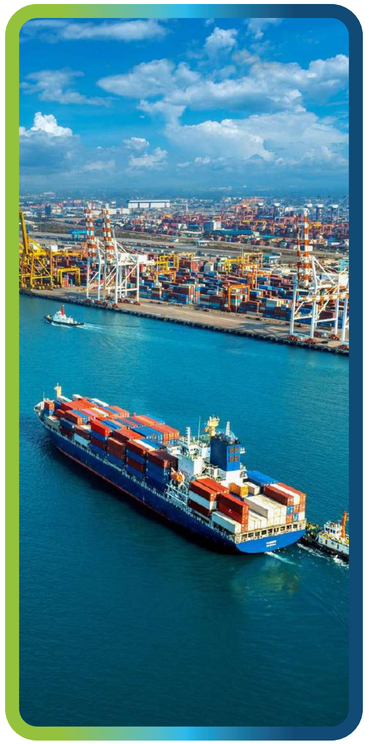
Compliance with anti-terrorism laws and economic and trade sanctions require us to avoid any engagement with sanctioned groups, companies or individuals.

It is our individual and collective responsibility to be aware of government policies, to obtain all necessary documentation before engaging in a transaction and to ensure that all compliance procedures have been met.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall comply with all anti-terrorisms laws and all applicable trade and economic sanctions and embargoes rules and regulations, including the applicable export controls.
- Suppliers shall not procure or purchase products or parts of these products, or services destined to be used by or sold to Holcim from a party that is subject to sanctions or embargoes or it is a sanctioned party.
- Suppliers shall conduct all required checks and shall perform appropriate due diligence to determine that any such party is not subject to sanctions or embargoes.
- Violations of anti-terrorism laws and economic and trade sanctions constitute Zero Tolerance Breaches.





OUR EXPECTATIONS OF SUPPLIERS

FAIRNESS

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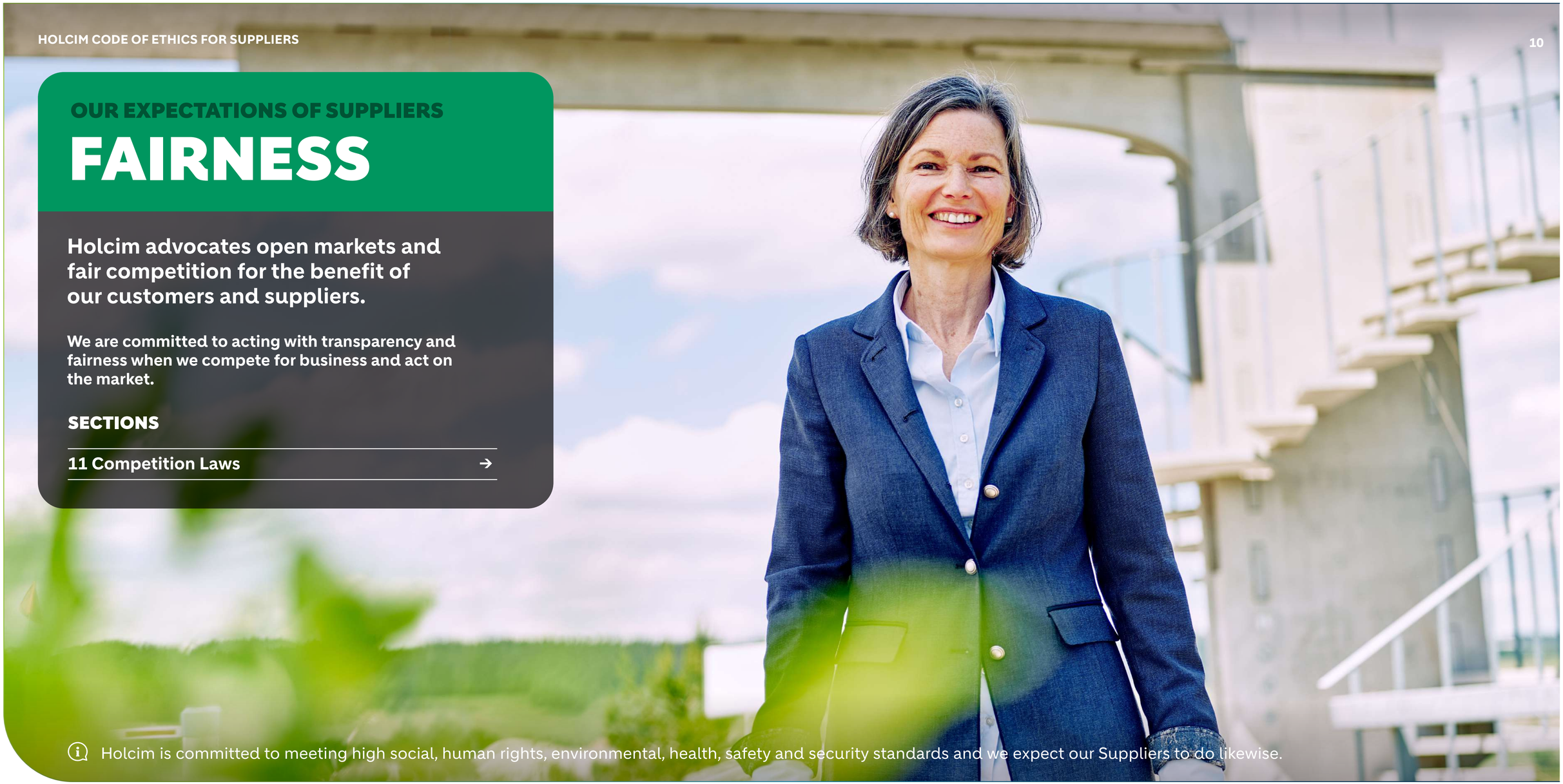
We are committed to acting with transparency and fairness when we compete for business and act on the market.

SECTIONS

11 Competition Laws →



Holcim is committed to meeting high social, human rights, environmental, health, safety and security standards and we expect our Suppliers to do likewise.

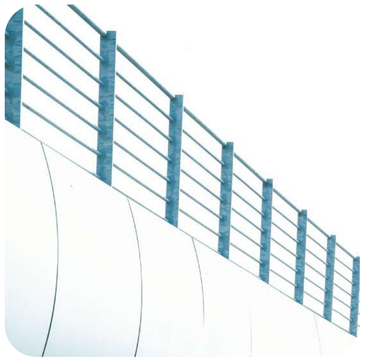
Competition Laws

Fair competition encourages businesses to offer high quality goods and services at the best possible price. Anti-competitive practices may restrict competition by creating entry barriers and unjustified price increases, which can lead to inefficiencies and stifling of innovation. This may impact economic growth and development of local communities, to the ultimate detriment of end-consumers.

Fair competition is critical. Violations of competition laws expose Holcim to governmental investigations and fines. There is sometimes a fine line between fair competition and anti-competitive practices. Seeking guidance from legal and Group competition law experts in cases of doubt is part of the responsibility.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall comply with all applicable competition laws in the performance of their contract with Holcim and, to this effect, have a zero tolerance policy towards any form of violation of such rules.
- Suppliers shall not, in particular, attempt to introduce in their contractual agreements with Holcim and with its suppliers, and other stakeholders, any conditions that would be in breach of competition laws.
- Suppliers are also expected to take all necessary precautions in order to avoid the disclosure of any commercially sensitive information about their supply relationship with Holcim to third parties and vice versa.
- Violations of competition laws constitute Zero Tolerance Breaches.



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Our purpose is building progress for people and the planet. Being a core part of the built environment, our products must impact the entire value chain in a positive way to ensure a safe and sustainable future.

We are committed to increasing our positive contributions to society and nature.

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Health and Safety for workers in the value chain

At Holcim, our people, customers, suppliers, and community members are our most important assets. Health, safety and environment are top priorities for Holcim.

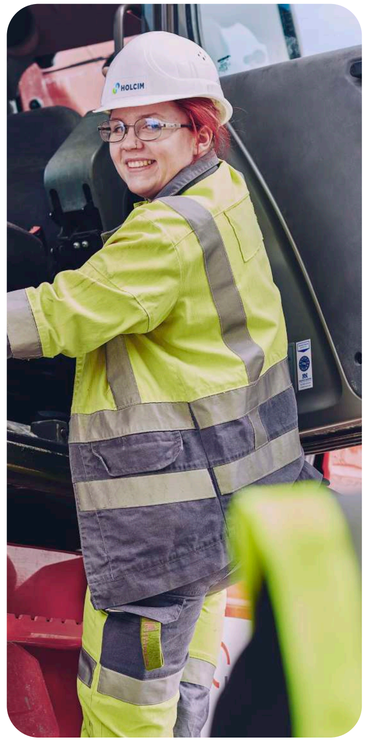
Nothing we do is worth risking harm to ourselves, to others or to our environment. This is a responsibility that all our people have for themselves and for one another.

Incorporating health and safety into everything we do is critical to our success as a company.

Whenever we work together with third parties our health and safety standards will be an integral part of any collaboration.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall provide a safe and healthy workplace for their employees, contractors and other stakeholders.
- Suppliers must have documented health and safety policies and/or procedures in place together with appropriate safety infrastructure and equipment.
- Suppliers identified as being moderate to high risk for Health and Safety (based on the hazard of jobs and locations) shall take action and bring proof of continuous improvement towards a recognized Health and Safety management system in place. When on Holcim sites, Suppliers must comply fully with applicable Holcim policies, directives and standards. When transporting our products, suppliers shall adhere to Holcim road safety standards.



Working Conditions and Welfare for workers in the value chain

At Holcim, we ensure the wellbeing of our people and we protect and promote human rights. We foster a culture where every individual feels respected, valued and empowered to contribute to their fullest potential.

Working conditions and welfare encompasses a wide range of factors related to the workplace. These include:

- **Physical environment:** Lighting, temperature, cleanliness, ventilation, noise levels, and access to necessary tools and equipment.
- **Work organization:** the way work is structured, including scheduling, workloads, time-off and work-life balance
- **Psychological aspects:** Creating a supportive and inclusive work environment, where employees feel valued. It also considers stress levels, job satisfaction and opportunities for development and growth.
- **Job security and economic well-being:** this includes aspects like fair wages, benefits, and the overall stability of employment.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall apply fair and decent working conditions, labour standards and welfare at work, implementing local and national laws, in compensating and providing contracts for all employees and their suppliers.
- Suppliers shall care about their workforce and respect the dignity, privacy and rights of each individual, including vulnerable minorities.
- Workers shall be paid at least the local industry rate or minimum wage stipulated by national law, whichever is higher, and benefit from social security schemes according to national standards. Should there be no legal minimum wage in the country of operation, fair and decent conditions imply suppliers shall pay their workers considering the general level of wages in the country, the cost of living, social security benefits and the relative living standards.
- Suppliers shall respect working time in accordance with national laws and internationally recognized minimum standards of 48 regular hours of work per week, a rest period of at least 24 hours every seven days and a maximum of 12 hours of voluntary overtime per week.

Management of Environmental Impacts

At Holcim, we ensure the prosperity of the environment at all our operations. Holcim's principles of respect for environmental protection, are integral to how we work with our suppliers in all markets

Management of environmental impacts is a systematic approach to identifying, assessing, and controlling the environmental consequences of of human activities, with a focus on minimizing negative impacts and promoting sustainable development. It involves understanding the potential effects on the environment and implementing strategies to mitigate those effects, protect natural resources, and preserve ecosystems.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall systematically manage their environmental impacts with respect, but not limited to: climate and energy, water, waste, chemicals, air pollution and biodiversity, and set objectives and targets to reduce such impacts.
- Suppliers identified as having a high environmental impact shall take action and demonstrate proof of continuous improvement towards having a recognized Environmental Management System in place.

Climate Action

As a global leader in innovative and sustainable building solutions, Holcim is addressing the challenge of climate change.

Climate action is at the heart of our business strategy. Holcim is committed to reach net-zero greenhouse gas emissions across the value chain by 2050.

We actively choose to partner with suppliers who align with our mission to advance climate actions and strengthen our collective impact.

OUR EXPECTATIONS OF SUPPLIERS

Suppliers identified as having moderate to high impact for Climate shall take actions to:

- Measure and disclose their CO2 emissions, verified by a third party.
- Set public reduction targets to decarbonize their operation (Scope 1 and 2) and their supply chain (Scope 3).
- Demonstrate proof of continuous improvement towards achieving the targets.

Nature Protection

Our nature strategy has a specific focus on restoring and preserving freshwater ecosystems and biodiversity to increase the resilience of our planet and society.

Our water contributions focus on freshwater use reduction, high water quality standards and freshwater replenishment. Our biodiversity contributions focus on progressive and transformative rehabilitation, reforestation and a landscape approach.

Circularity is at the core of everything we do and is a lever for our net-zero journey. As a leader in recycling, we apply the principles of “reduce, recycle and regenerate” across our business.

OUR EXPECTATIONS OF SUPPLIERS

Water
Suppliers identified as having moderate to high impact for Water shall take actions to:

- measure and disclose their freshwater withdrawal and water pollution
- set public reduction targets for reducing the freshwater withdrawal and water pollution
- demonstrate proof of continuous improvement towards achieving the targets

Forest
Suppliers identified as having moderate to high impact on forest shall take actions to implement Responsible Forest practices and work toward having external certification (eg FSC- Forest Stewardship Certification, PEFC - Programme for Endorsement of Forest Certification).

Mining
Suppliers identified as having moderate to high impact for land through mining activities shall take actions to implement Responsible Mining practices that includes quarry rehabilitation to restore biodiversity loss and deforestation

In addition, if in their supply chain there are tin, tungsten, tantalum and gold, suppliers shall:

- implement a due diligence system based on the OECD Due Diligence Guidance, to ensure their supply chain is free of conflict minerals
- publish an annual report on their conflict minerals compliance efforts, publicly available to ensure transparency and accountability
- demonstrate compliance with Specific Regulations: Swiss Code of Ordinance, EU Conflict Minerals Regulation, US Securities and Exchange Commission (SEC) and any other related national regulations

OUR EXPECTATIONS OF SUPPLIERS

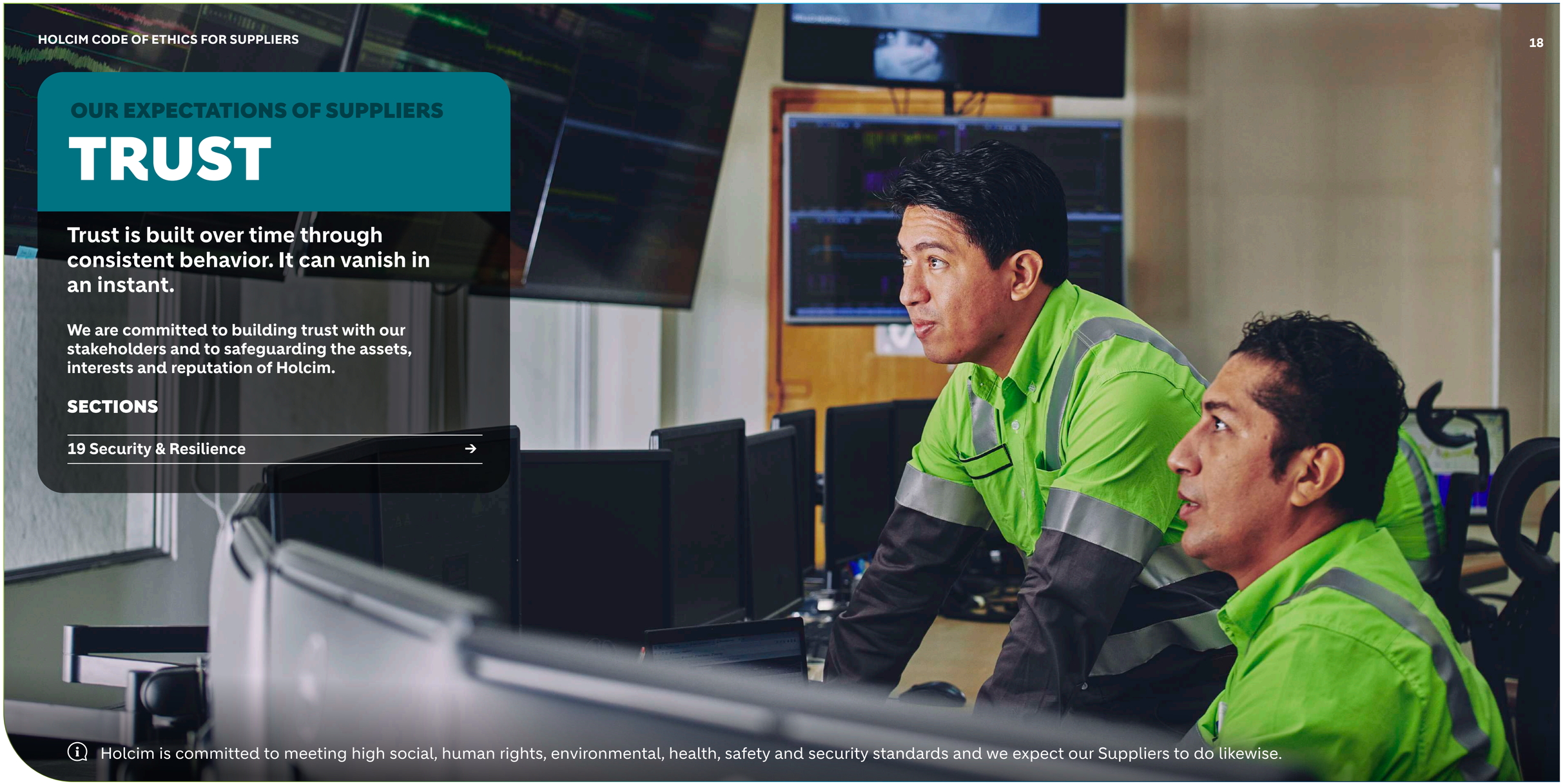
TRUST

Trust is built over time through consistent behavior. It can vanish in an instant.

We are committed to building trust with our stakeholders and to safeguarding the assets, interests and reputation of Holcim.

SECTIONS

19 Security & Resilience →



Holcim is committed to meeting high social, human rights, environmental, health, safety and security standards and we expect our Suppliers to do likewise.

Security & Resilience

The security of our people and resilience of our business are paramount in a volatile and sometimes uncertain business environment.

At Holcim, we prioritize the security of our people over all other assets and over business continuity.

Our global operations must be resilient. We must anticipate and adjust to changing circumstances. Resilient businesses are better equipped to handle unexpected challenges and are more likely to emerge stronger from them. Resilience is required across a broad spectrum, from more familiar areas such as sustainability or health and safety to intentional criminal activity and malicious acts, which could all have a negative impact on the safety and security of our people.

We take actions to ensure our supply chain is stable, secure, and future-ready.

OUR EXPECTATIONS OF SUPPLIERS

Security Service providers shall

- Comply with Holcim's Security requirements included in the Security Services with Integrity Directive and with all applicable national regulations on Security and Human Rights.
- Demonstrate that all personnel are trained in compliance with Holcim's Directive and aligned with relevant international standards and national legal requirements.

Resilience

- Suppliers of critical products and services are required to take a proactive and structured approach to resilience, demonstrating an understanding of operational resilience risks and dependencies across their own supply chain and business operations.

USEFUL LINKS

- United Nations Resilience Maturity Assessment (ReMA)
- International Code of Conduct Association
- Voluntary Principles for Security and Human Rights

OUR EXPECTATIONS OF SUPPLIERS

RESPECT

People are at the heart of Holcim and our success — our employees, customers, business partners and many more people around the world whose lives we improve with our products and solutions.

We are committed to respecting and promoting human and labor rights in our operations, business relationships and in the communities where we work. Respect for human rights is fundamental to the way we work.

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Holcim is committed to meeting high social, human rights, environmental, health, safety and security standards and we expect our Suppliers to do likewise.

Freedom of Association and Non-retaliation

Human rights are universally applicable and respecting them is our legal and ethical obligation. This include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, and the right to work and education.

Freedom of association entails respect for the right of employers and workers to freely and voluntarily establish and join organizations of their own choice in order to promote and protect their own interests, and the right of the group to take collective action to pursue the interests of its members (collective bargain).

Retaliation is the act of hurting someone or doing something harmful to someone because they have done or said something (e.g. discrimination, harassment, termination of contract).

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall not interfere with workers' freedom of association and right to collective bargaining.
- Employee representatives shall not be subject to discrimination, harassment or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations.
- Freedom of association and collective bargaining in situations where they are restricted by local law shall be still guaranteed through other mechanisms as described by the ILO (e.g. works councils).

Forced Labor and Modern Slavery

At Holcim, we prohibit any form of forced labour. Human rights are universally applicable and respecting them is our legal and ethical obligation.

Forced labour, or unfree labour, is any work relation in which people are compelled against their will to provide work or service through the use of force, fraud, or coercion.

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, fraud or coercion. This includes but is not limited to human trafficking, slavery, servitude, forced labour and debt bondage.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall not use labour provided involuntarily under threat of penalty, including, but not limited to: forced overtime, human trafficking, slavery or servitude, debt bondage, forced prison labor. Suppliers shall not withhold migrant workers' identification documents.
- Violations of forced labour and modern slavery laws constitute Zero Tolerance Breaches.

Child Labor

At Holcim, we prohibit child labour. Human and children rights are universally applicable and respecting them is our legal and ethical obligation.

The term child labour is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

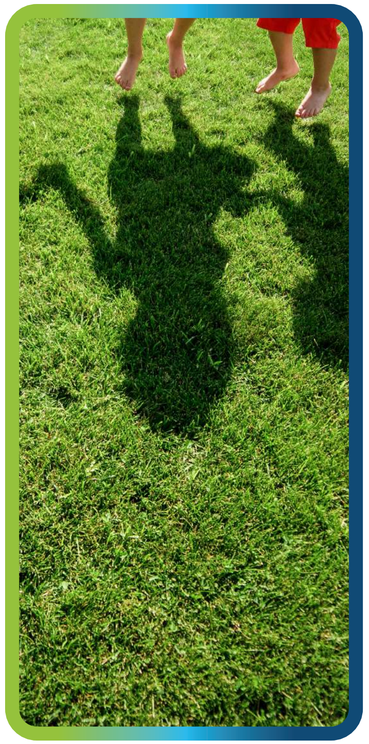
It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

The worst forms of child labour involve children being enslaved, separated from their families, exposed to serious hazards and illnesses and/or left to fend for themselves on the streets of large cities – often at a very early age.

Hazardous child labour is work in dangerous or unhealthy conditions that could result in a child being killed, or injured or made ill as a consequence of poor safety and health standards and working arrangements. It can result in permanent disability, ill health and psychological damage

OUR EXPECTATIONS OF SUPPLIERS

- Holcim's commitment is aligned with the principles outlined in the International Labour Standards on Child Labour, which includes the Minimum Age Convention and the Worst Forms of Child Labour Convention. Suppliers are expected to adhere to the same standard or to local law, whichever is more stringent.
- Suppliers shall prevent all forms of child labour. The minimum working age is the age of completion of compulsory schooling, but never less than 15 years old. Young Employees between the ages of 15 – 18 years shall not be exposed to work that is likely to harm their physical or mental health, safety or morals.
- Violations of child labour laws constitute Zero Tolerance Breaches.



Discrimination, Harassment or Abusive Behavior

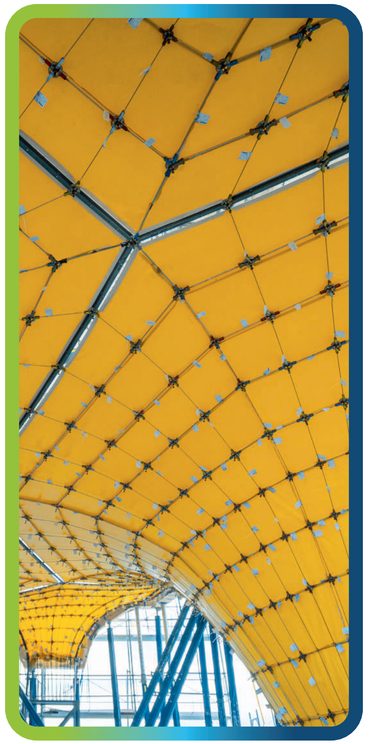
At Holcim, we foster a culture where every individual feels respected, valued and empowered to contribute to their fullest potential. Combining different perspectives drives innovation and brings the best out of all of us.

We strive for an environment in which fairness, personal dignity, privacy, freedom of association and the personal rights and safety of every individual are part of our everyday work experience.

We value and promote a workplace where everyone has equal opportunities for high performance and success.

OUR EXPECTATIONS OF SUPPLIERS

- Employment-related decisions shall be based on relevant and objective criteria. Suppliers shall make no distinctions on grounds including, but not limited to: age, disability, gender, sexual orientation political or other opinion, ethnic, indigenous or social origin or religion. Employment- related decisions include, but are not limited to: hiring, promotion, lay-off and relocation of workers, training and skills development, health and safety, any policy related to working conditions like working hours and remuneration
- Suppliers shall not use corporal punishment, disciplinary practices and any form of harassment or abusive behavior, including, but not limited to: physical, sexual or psychological compulsion, exploitation or coercion.



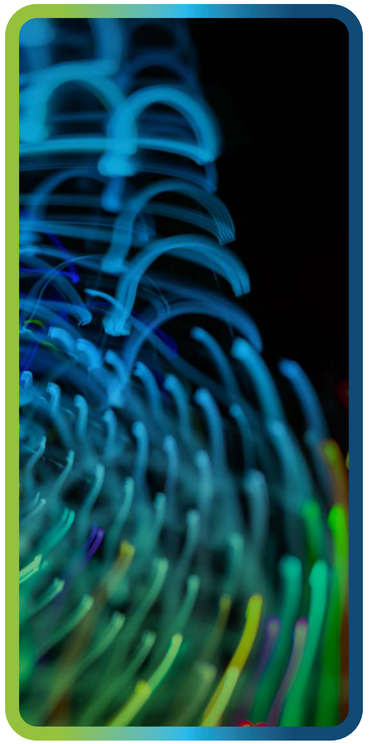
Data Privacy

Privacy is a fundamental human right protected by local and international laws. In a digital world, data privacy has become a cornerstone to protect the privacy rights of everyone.

Our data privacy program is built around key requirements of applicable data privacy laws and is designed to ensure lawfulness, fairness and transparency. We keep our program up to date so that it continues to meet evolving data privacy and security requirements.

OUR EXPECTATIONS OF SUPPLIERS

- Suppliers shall properly use personal data only per Holcim's instructions, and safeguard it from accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of or access to such data.
- Suppliers must ensure that personal data about individuals is collected, stored, used, processed or shared in accordance with all applicable data privacy laws.



Grievance Mechanisms

Holcim strives to adhere to the highest business and ethical standards to meet and exceed employee and stakeholder expectations. To support transparency over its conduct and business integrity, Holcim is committed to a culture of speaking up.

Any concern over known or suspected misconduct, which means any conduct relating to Holcim's business that is potentially illegal or violates the Code or other applicable policies and directives, should be reported.

Holcim has implemented various reporting channels, including the Integrity Line, a whistleblowing tool managed by an independent external provider, that provides a safe, anonymous and confidential environment in which anyone (internal employees or external parties) can raise concerns relating to Holcim's business practices. It is available 24 hours a day and 7 days a week.

OUR EXPECTATIONS

SpeakUp

- Holcim offers an independent channel for employees and external stakeholders, including suppliers and workers in the value chain, to raise questions and concerns about Holcim's business practices

IF SOMETHING DOESN'T FEEL RIGHT,

SPEAK UP

HOLCIM.COM/SPEAKUP

(Holcim Organization Code: 117634)

Definitions

Suppliers
The term Suppliers refers to suppliers of goods and services (which includes Contractors and its Subcontractors performing works for or on behalf of Holcim and its associated companies). More stringent provisions might apply to some Contractors, to Transportation companies, to Security Service Providers (Private and Public forces), to suppliers of extractive materials and to suppliers that have a government intermediary function. Provisions are outlined in our governance documents (associated with the risk exposure related to the services and products provided) and communicated to suppliers accordingly. Nothing in this Code is meant to supersede any more specific provision.

Standards for Suppliers (section 3 of the Code)
Standards are based on the United Nations Global Compact Ten Principles, the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

ESG/H & S
Environment, Social, Governance, Health and Safety: These are the areas where standards are established and expected suppliers to adhere and demonstrate performance. "Governance" also includes aspects related to bribery, corruption, competition law, data protection and adherence to local, national and international legislation.

Welfare
The provision of facilities, clean and in good conditions, that are necessary for the well-being of employees, such as washing, toilet, rest and changing facilities and somewhere to eat and drink during breaks. The supply of potable drinking water is provided according to local water quality standards, as well as the World Health Organization (WHO) Guidelines for Drinking- Water Quality; and maintained at suitable points accessible to all employees and contractors in a clean and safe place

ILO
The International Labour Organization is a United Nations agency whose mandate is to advance social and economic justice through setting international labour standards

Prioritized suppliers
Holcim identifies potential ESG/H & S impact in the supply chain, by applying a risk-based screening methodology on the supplier base. A 3-steps approach based on:
1. ES G/H & S risks related to the product/services provided
2. Risks exposure related to business relationship (volumes and spend)
3. Country risk level, according to the UN Human Development Index and the Freedom House Index, used as an indication of the business risk environment.

Zero Tolerance Breaches
Breaches to the Holcim Code of Conduct requirements that are not tolerated and lead to an immediate termination of the business relationship. These include the areas explicitly highlighted in this Code as well as very severe breaches. In any other area where Holcim strives to support Suppliers in improving the social and environmental programs, breaches to non-zero tolerance requirements do not lead to immediate termination of business relationships but are to be addressed via action plans and ongoing performance evaluation (e.g. poor water management system in place).

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