

# Directive

## Responsible Lobbying and Advocacy

April 2020

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## 1. Introduction, scope and objective

This Responsible Lobbying and Advocacy Directive (the Directive) applies to all Holcim employees engaging directly or indirectly via third parties with public authorities for the purpose of advocating Holcim business interests. Holcim regularly engages public authorities in order to inform policy debate and to assist public authorities in their decision-making processes on issues of relevance to Holcim.

Holcim commits to dealing transparently and fairly in all its lobbying activities and complies with all the laws and regulations related to such activities. Similarly, all third parties engaging in advocacy or lobbying activities on behalf of Holcim, including consultancies, lobbying firms and individuals, must be informed about and agree to compliance with this Directive.

## 2. Rules and requirements

### 2.1 Transparency

Holcim

- Is committed to giving reliable, constructive and up-to-date information to public authorities
- Is transparent on its public positions and on the list of topics on which it advocates
- Clearly identifies its lobbying positions and activities by ensuring its employees and relevant third-parties disclose to public authorities that they are acting on behalf of, or in the name of, the Holcim Group
- Enrolls in lobbying and transparency registers where applicable, and
- Is transparent with regard to its Public Affairs organization as well as coalitions, think-tanks and professional organizations of which it is a member

### 2.2 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 (ABC) Policy
- Does not use any improper, fraudulent or dishonest means to obtain information or decisions
- Remains politically neutral and does not make political donations unless expressly permitted under written local laws and applicable Holcim policies and guidelines, and transparently and accurately recorded
- Respects and supports freedom of expression, accurate and truthful reporting as well as other stakeholders' rights to express their opinions and positions
- Acts in accordance with fair competition principles and in particular does not engage in discussions or behaviors in the presence of competitor representatives that could violate applicable competition laws and regulations
- Does not attempt to acquire information illegally or misuse legally acquired information
- 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
- Is committed to act promptly to correct any misinformation that may occur, and
- Ensures that actual and potential conflict of interests in lobbying activities are identified and actively addressed by line management consistent with the Decisions with Integrity - Conflict of Interest Directive

### 2.3 Internal information and training

Holcim

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- Ensures that relevant employees receive regular training on this Directive, the ABC Policy and Fair Competition Directive as well as best practices in terms of engagement with public authorities and compliance with all applicable laws
- Ensures that the Group's public positions are shared, understood and adhered to by all relevant internal entities, and
- Ensures that engagements with public authorities are properly documented wherever possible through agendas and minutes of meetings, and preserved according to internal record keeping requirements.

Employees that have questions or are otherwise unclear about their obligations in relation to any lobbying and advocacy activities can reach out to their supervisors or refer to their local Legal and Compliance Officers or Group Compliance for guidance. Where lobbying activities are planned in countries that pose increased corruption risks or that lack transparency with regard to lobbying activities, it is highly recommended to consult with Legal and Compliance before commencing any such programme so that appropriate controls, contractual structures and safeguards can be put in place to protect the company and individual employees.

### *2.4 Roles and Responsibilities*

Holcim

Country CEOs (or Heads of Group Function) to:

- Ensure all lobbying or advocacy activities have been reviewed by Sustainable Development, cleared by Legal & compliance and approved by the Country CEO / or Head of Group Function.
- All third party consultants engaged to assist in lobbying or advocacy are screened in accordance with the Third Party Due Diligence Directive.
- Lobbying or advocacy activities are documented and approvals recorded.

Original dated: May 30th 2016, Revision 1: May 13th, 2020

Date of approval	Responsible Group Executive Member	Responsible Manager
Revision 1 May 13th	Magali Anderson, Chief Sustainability Officer	Cedric de Meeûs Head, Group Public Affairs

## Annexes

### Annex 1: Holcim Policies and Directives related to this Directive

Link to Policy	Policy/Directive	Definition / Description	Responsibility	Reference
Policy Framework	Code of Business Conduct	Comprehensive guidance document on workplace- related conduct requirements	Compliance	
Policy Framework	Compliance Policy	Mandates the compliance program and outlines its scope and general principles.	Compliance	
Policy Framework	Anti-Bribery and Corruption Policy (once adopted)	Sets the relevant principles for appropriate business conduct and related rules when interacting with Third Parties whether Public Officials or business partners	Compliance	ABC Policy
Policy Framework	Third Party Due Diligence Directive (once adopted)	Defines due diligence requirements in relation to Third Parties interacting on behalf of Holcim with Public Officials	Compliance	Third Party Due Diligence Directive
Policy Framework	Fair Competition Directive	Defines and sets the principles of fair competition and competition law to be applied by Holcim employees	Compliance	Fair Competition Directive

## Annex 2: Definitions and Abbreviations

<i>ABC</i>	Anti-Bribery and Corruption
<i>Advocacy</i>	Action of direct or indirect communication with Public Authorities to put forward positions with the aim of influencing policy-making.
<i>Donations</i>	Donations are voluntary one off contributions to an institution or organization where Holcim does not receive or expects to receive anything in return. Donations can be monetary or in kind support, such as the supply of material.
<i>Employee</i>	All officers and Employees of Holcim, including interns, temporary workers, contract workers and anyone over whom Holcim could reasonably be expected to exert control in the way the person completes his or her work.
<i>Holcim</i>	Holcim Ltd and all of its consolidated affiliates from time to time.
<i>Lobbying</i>	Action of direct or indirect communication with Public Authorities to influence specific policies, laws, programs, standards or positions.
<i>Local Compliance Officer</i>	Formally appointed Compliance Officer responsible for the defined geography.
<i>Public International Organization</i>	An organization whose members are countries, government or other Public International Organizations.
<i>Public Authorities</i>	Any officer, Employee or person acting on behalf of (a) a government, its department, agency or Government Instrumentality or (b) a Public International Organization. The term also includes political party officials and candidates for political office.
<i>Public Positions</i>	Holcim's views on public policies exposed to external audiences.