

## **UN Global Compact Communication on Progress 2010**

## **About Holcim**

Holcim is one of the world's leading suppliers of cement and aggregates (crushed stone, gravel and sand), as well as further activities such as ready-mix concrete and asphalt including services. The Group has majority and minority holdings in around 70 countries across all continents.

Holcim has been a member of the UN Global Compact since 2003 and reports yearly on progress made in implementing the ten principles of the UN Global Compact. This Communication on Progress refers to 2010 data and performance information which has been updated on Holcim's website in June 2011. With the publication of its next sustainable development report in spring 2012, Holcim aims to submit a COP that meets the Advanced Level. This COP can be seen as a hybrid between the Global Compact Active and Advanced Level.

## Statement of Support from Markus Akermann:

"Holcim continues to participate in the UN Global Compact and remains committed to its philosophy, intent and principles. In 2010, Holcim actively contributed to the Environmental Stewardship Working Group and the Business and Peace Initiative. As part of its on-going commitment, Holcim attended the UNGC Leaders Summit in 2010 and applauds the Global Compact for the wide range of new resources and thinking launched at this event. At local level, Holcim has been elected in 2011 to the board of the Swiss Global Compact network and remains involved in the local networks in many other countries where Holcim operates."

| Criteria   | Holcim commitment  | Links  |
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| Strategy, Governance and Engagement  | Description of Holcim's commitment   |  |
| 1. C-suite and Board level discussions of<br>strategic aspects of Global Compact<br>implementation   |  |  |
| <ul> <li>Impact of broader sustainability<br/>trends on the long-term prospects<br/>and financial performance of the<br/>organization</li> </ul> | Holcim is committed to creating value for all its stakeholders and has placed sustainable development at the heart of its business strategy. | <ul> <li><u>CEO and chairman statement in the Annual Report. (See page 10)</u></li> <li><u>Business Risk Management section in the Annual Report. (See page 144)</u></li> <li><u>SD materiality review in the CSDR and online</u></li> </ul> |

| Criteria  | Holcim commitment   | Links  |
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| <ul> <li>Major sustainability risks and<br/>opportunities in the near to medium<br/>term (3-5 years)</li> </ul>                       | Holcim has a well-embedded business risk<br>management process for identifying risks at both<br>corporate and Group company level. Since 2007, a<br>materiality review has been implemented to ensure<br>the identification of sustainability risks and<br>opportunities. | SD materiality review in the CSDR and online   |
| <ul> <li>Social and environmental impact of<br/>the organization's activities</li> </ul>  | The most important contribution to sustainable development is through products and services. The current SD priorities of Holcim are:   | <u>CEO and chairman statement in the</u><br><u>Annual Report. (See page 10)</u><br>SD materiality review in the CSDR and                           |
|   | <ul> <li>sustainable products and sustainable<br/>construction</li> </ul>   | online   |
|   | <ul> <li>energy and climate</li> </ul>  |  |
|   | <ul> <li>resources conservation</li> </ul>  |  |
|   | social engagement   |  |
| <ul> <li>Overall strategy to manage<br/>sustainability impacts, risks and<br/>opportunities in the near to medium<br/>term</li> </ul> | Holcim has a well-embedded business risk<br>management process for identifying risks at both<br>corporate and Group company level. Sustainability<br>impacts, risks and opportunities are included in the<br>remit of the risk management process.                        | Vision and strategy<br>Business Risk Management section in<br>the Annual Report. (See page 144)<br>SD materiality review in the CSDR and<br>online |
| Key performance indicators to<br>measure progress   | Sustainable development data and performance information is updated on a yearly basis on Holcim's website.  | SD performance data 2010 (Download pdf from right hand column)   |
| <ul> <li>Major successes and failures during<br/>the reporting period</li> </ul>  | See link.   | Sustainable Development section in the Annual Report. (See page 40)  |

| Criteria   | Holcim commitment  | Links  |
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| 2. Effective decision-making process<br>and systems of governance for<br>corporate sustainability  |  |  |
| <ul> <li>Involvement and accountability of<br/>management (C-suite) in corporate<br/>sustainability strategy<br/>and implementation in line with<br/>Global Compact principles</li> <li>Corporate governance structure<br/>(Board of Directors or equivalent)<br/>and its role in oversight of corporate<br/>sustainability implementation in line<br/>with Global Compact principles</li> </ul> | A steering group for SD operates as a sub-committee<br>of the Executive Committee and includes the CEO,<br>two other Exco member and the head of sustainable<br>development                        | Managing sustainable development, (SD<br>website)<br>CSDR, p.7<br>Organisation and Management section in<br>the Annual Report. (See page 27)   |
| <ul> <li>Evaluation and executive incentive<br/>structures promoting sustainability<br/>strategy in line with Global Compac-<br/>principles</li> </ul>   | For the most senior executives a standard variable compensation system is in place. SD indicators form an integral part.   | <u>Human resources section in the Annual</u><br><u>Report. (See page 45)</u>   |
| 3. Engagement with all important stakeholders  |  |  |
| <ul> <li>List of stakeholder groups engaged<br/>by the organization</li> </ul>   | Each chapter of the Corporate Sustainable<br>Development report and the website contains a<br>section on stakeholder engagement where details of<br>engagement with key stakeholders are detailed. | CSDR, External Report Review panel<br>(p.7)<br>In the CSDR see also:<br>Sustainable products and sustainable<br>construction –page 9;<br>Energy and climate – Pgs 13 & 14;<br>Resources conservation – Pgs 14, 15 & 17;<br>Social commitment – Pgs 17–19 & 22. |

| Criteria   | Holcim commitment   | Links   |
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| Process for stakeholder<br>identification and engagement   | At Holcim, developing and maintaining strong<br>relationships with its stakeholders is vital to the<br>success of its business. Holcim is committed to a<br>continuous process of listening to, and learning from,<br>people and organizations engaged with its operations<br>around the world. | In the CSDR see:<br><u>Sustainable products and sustainable</u><br><u>construction –page 9;</u><br><u>Energy and climate – Pgs 13 &amp; 14;</u><br><u>Resources conservation – Pgs 14, 15 &amp; 17;</u><br><u>Social commitment – Pgs 17–19 &amp; 22.</u><br>On our website; see <u>the "stakeholder</u><br><u>engagement " section</u> |
| Outcome of stakeholder<br>involvement  | Holcim remains committed to ongoing consultation<br>with a broad range of stakeholders, as demonstrated<br>by the fact that 41% of Group companies have a<br>community advisory panel in place and 86%<br>conducted a stakeholder dialog in 2010.   | On our website; see <u>the "stakeholder</u><br>engagement " section   |
| <ul> <li>Process of incorporating<br/>stakeholder input into corporate<br/>strategy and business decision-<br/>making</li> </ul>                       | For example an External Report Review Panel has<br>been asked to give feedback to Holcim's SD<br>materiality review.  | SD materiality review in the CSDR and<br>online<br>On our website; see the "stakeholder<br>engagement " section   |
| UN Goals and Issues  |   |   |
| 4. Actions taken in support of broader UN goals and issues   |   |   |
| <ul> <li>Adoption or modification of<br/>business strategy and operating<br/>procedures to maximize<br/>contribution to UN goals and issues</li> </ul> | Holcim is committed to creating value for all its<br>stakeholders. Sustainable development has been<br>placed at the heart of the business strategy for many<br>years, as it contributes to adding value and ensuring<br>continued success.   | <u>Vision and strategy page on the website</u><br><u>CSDR – see pages 6 - 9</u><br><u>Innovation section in the Annual Report.</u><br><u>(See page 32)</u>  |

| Criteria   | Holcim commitment   | Links   |
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| <ul> <li>Development of products, services<br/>and business models that<br/>contribute to UN goals and issues</li> </ul>   | As a major player in the industry, Holcim has a role to<br>contribute to sustainable products and building<br>techniques through product and process innovation.  | Sustainable products and construction<br>section on the website<br>Innovation section in the Annual Report.<br>(See page 32)<br>Affordable housing<br>Foundation for Sustainable Construction |
| <ul> <li>Social investments and<br/>philanthropic contributions that tie in<br/>with the organization's core<br/>competencies, operating context<br/>and strategy</li> </ul> | Holcim aims to link its CSR engagement with its<br>business activities. Group companies focus on<br>projects in collaboration with stakeholders where the<br>expertise can contribute to achieving greater impacts.<br>Engagement areas include education provision,<br>infrastructure building and sustainable community<br>development. | Community involvement pages on website  |
| <ul> <li>Public advocacy on the importance<br/>of one or more UN goals and issues</li> </ul>   | Holcim constructively contributes to the climate change policy debate to develop effective regulatory incentives to improve energy efficiency and CO <sub>2</sub> intensity.  | More information on Holcim's position on climate change.  |
| <ul> <li>Partnership projects and collective actions in support of UN goals and issues</li> </ul>  | Holcim has a number of corporate strategic<br>partnerships with GIZ; ICRC; IUCN; WBCSD and<br>UNGC. Furthermore operating companies engage in<br>many local partnerships  | Links:<br>• <u>GIZ;</u><br>• <u>ICRC;</u><br>• <u>IUCN;</u><br>• <u>WBCSD &amp; CSI;</u><br>• <u>UNGC</u><br>• <u>List of local partnerships</u>  |
| Human Rights Implementation  |   |   |
| 5. Robust commitments, strategies and  |   |   |

| Criteria  | Holcim commitment  | Links   |
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| policies in the area of human rights  |  |   |
| <ul> <li>Reference to relevant international<br/>conventions and other international<br/>instruments</li> </ul> | Holcim's commitment to human rights is part of our CSR policy and reflected in our participation in the UN Global Compact.   | Link to Holcim CSR Policy (refers to the Universal Declaration of Human Rights) |
| <ul> <li>Written company policy (e.g. in the code of conduct) on human rights</li> </ul>                        |  |   |
| Reflection on the relevance of<br>human rights for the company  | Human rights have been identified as an important issue in the SD materiality review.  | SD materiality review in the CSDR and online                                    |
| <ul> <li>Allocation of responsibilities and accountabilities within the organization</li> </ul>                 | Human rights management is coordinated by the<br>social responsibility department in collaboration with<br>the risk management unit and other relevant<br>functions such as Human Resources and<br>Procurement.  | <u>Managing sustainable development, (SD</u><br><u>website)</u>                 |
| <ol> <li>Effective management systems to<br/>integrate human rights principles</li> </ol>                       |  |   |
| <ul> <li>Risk and impact assessments in the area of human rights</li> </ul>                                     | Human Rights are part of Holcim's risk management system: In addition, specific assessments are conducted in countries where HR issues arise.  |   |
|   | A specific group of companies has been identified as<br>operating in a high risk environment and are<br>therefore required to conduct a complete Human<br>Rights Impact Assessment. Such assessments have<br>been conducted in Sudan, Madagascar and the<br>Philippines. |   |
| <ul> <li>Regular stakeholder consultations<br/>in the area of human rights</li> </ul>                           | The Holcim External Report Review Panel has<br>identified human rights as an issue of high<br>importance in Holcim's SD materiality review. In   | SD materiality review in the CSDR and online                                    |

| Criteria   | Holcim commitment  | Links   |
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|  | addition, 16% of Group companies report conducting specific stakeholder dialogue on human rights related issues.   |   |
| <ul> <li>Internal awareness-raising and<br/>training on human rights for<br/>management and employees</li> </ul>                                       | 41% of Group companies report including equal opportunity issues in training programs, while 34% of Group companies report covering human rights in employee training.   | Link to human rights section on website             |
| Grievance mechanisms,<br>communication channels and other<br>procedures (e.g. whistleblower<br>mechansims) for reporting concerns<br>or seeking advice | 88% of Group companies report having systems to<br>collect and handle employee grievances and<br>complaints, and 76% report having arrangements for<br>submitting complaints and/or grievances<br>anonymously. Furthermore, 27% report having<br>specific committees in place to deal with human<br>rights disputes. | Link to employment practices section on the website |

| Criteria   | Holcim commitment  | Links  |
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| <ul> <li>Inclusion of minimum human rights standards in contracts with suppliers and other relevant business partners</li> <li>Audits or other steps to monitor and improve the human rights performance of companies in the supply chain</li> </ul> | Holcim is working on developing and implementing a<br>Sustainable Procurement Initiative, which will include<br>amongst other things a Supplier Code of Conduct<br>and a methodology for identifying and assessing<br>critical suppliers. The process involved internal<br>workshops and interviews with selected external<br>stakeholders. The Initiative is expected to be rolled<br>out in 2012.                        | Supplier screening data on the Holcim<br>website |
| <ol> <li>Effective monitoring and evaluation<br/>mechanisms of human rights<br/>integration</li> </ol>   |  |  |
| System to track and measure<br>performance based on<br>standardized performance metrics  | At corporate level, Holcim is currently developing a<br>Group-wide human rights management system in line<br>with John Ruggie's Guiding Principles that includes<br>comprehensive issue monitoring. Holcim conducted a<br>human rights risk mapping at Group level as well as<br>in-depth human rights impact assessments in<br>selected countries in 2011. Tracking and monitoring<br>performance is part of this system. |  |
|  | Holcim monitors its impact through continuous stakeholder engagement that includes Community Advisory Panels and regular needs assessments.  |  |
| Leadership review of monitoring<br>and improvement results   | Group company leadership monitors performance<br>and improvement results as part of the annual<br>business planning and risk management cycle. In<br>addition, results if Human Rights Impact assessments<br>are reviewed by top management and actions<br>defined.  |  |
| Process to deal with incidents   | All Holcim Group companies are required to have<br>Community Engagement Plans that includes the  |  |

| Criteria   | Holcim commitment   | Links |
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|  | establishment of Community Advisory Panels where<br>appropriate. The Sustainable Development function<br>at corporate level supports Group companies in<br>addressing potential challenges with site visits,<br>stakeholder engagement activities, cooperation with<br>global and local expert organizations, workshops and<br>training.                        |       |
| 8. Standardized performance indicators<br>(including GRI) on human rights  |   |       |
| <ul> <li>Outcomes of risk and impact<br/>assessments</li> </ul>  | Holcim is currently developing a Group-wide human<br>rights management system that includes human<br>rights impact assessments in selected countries of<br>operation. Progress is monitored and reported at<br>local and corporate levels.  |       |
| <ul> <li>Outcomes of internal awareness<br/>raising and training efforts</li> </ul>                                    | 41% of Group companies report including equal<br>opportunity issues in training programs, while 34% of<br>Group companies report covering human rights in<br>employee trainings.  |       |
| <ul> <li>Outcomes of mechanisms for reporting concerns or seeking advice</li> </ul>                                    | The share of Group companies reporting having<br>anonymous procedures for submitting complaints or<br>grievances increased in the reporting period (2010:<br>76%; 2009: 63%). Additionally, 27% of Group<br>companies report having special committees<br>responsible for hearing, processing and settling<br>disputes related to human rights issues in place. |       |
| <ul> <li>Percentage of contracts with<br/>business partners guaranteeing<br/>minimum human rights standards</li> </ul> | 20% of Group companies report screening all major<br>investments for human rights-related risks and 47%<br>of Group companies report specifically screening<br>investments where a risk has been identified. A<br>Supplier Code of Conduct will be implemented in the   |       |

| Criteria  | Holcim commitment   | Links  |
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|   | context of Holcim's Sustainable Procurement Initiative.   |  |
| Outcome of audits or other steps to<br>monitor and improve performance<br>in the supply chain   | Holcim is working on developing and implementing a<br>Sustainable Procurement Initiative, which will include<br>amongst other things a Supplier Code of Conduct<br>and a methodology for identifying and assessing<br>critical suppliers. The process involved internal<br>workshops and interviews with selected external<br>stakeholders. The Initiative is expected to be rolled<br>out in 2012. | Supplier screening data on the Holcim<br>website |
| Labour Principles Implementation  |   |  |
| <ol> <li>Robust commitments, strategies or<br/>policies in the area of labour</li> </ol>  |   |  |
| <ul> <li>Reference to relevant international<br/>conventions and other international<br/>instruments (eg. ILO Core<br/>Conventions) &amp; written company<br/>policy on labour</li> </ul> | Holcim's commitment to employment practices is part<br>of its CSR policy and reflected in its participation in<br>the UN Global Compact.  | Link to CSR policy on Holcim website             |
| <ul> <li>Reflection on the relevance of the<br/>labour principles in the company</li> </ul>   | Employment practices have been identified as an important issue in the SD materiality review.   | SD materiality review in the CSDR and online     |
| <ul> <li>Allocation of responsibilities and<br/>accountability within the<br/>organization</li> </ul>   | Responsibility and accountability for labor rights lies<br>with the human resources department of Holcim and<br>the operating companies, in coordination with the<br>Social Responsibility department of the SD function.   |  |
| 10. Effective management systems to<br>integrate the labour principles  |   |  |
| Risk and impact assessments in the area of labour   | Employment practices have been identified as an important issue in the SD materiality review.   | SD materiality review in the CSDR and online     |
| Regular stakeholder consultations   | The Holcim External Report Review Panel has   | SD materiality review in the CSDR and            |

| Criteria   | Holcim commitment   | Links   |
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| in the area of labour  | identified employment practices as an issue of high importance in Holcim's SD materiality review.   | online  |
| <ul> <li>Internal awareness-raising and<br/>training on the labour principles for<br/>management and employees</li> </ul>  | Holcim is committed to providing equal opportunities<br>for all its employees and works on strengthening a<br>culture of mutual respect, trust and openness.  | Link to employment practices section on the website |
| Grievance mechanisms,<br>communication channels and other<br>procedures (e.g. whistleblower<br>mechanisms) for reporting concerns<br>or seeking advice   | 88% of Group companies report having systems to<br>collect and handle employee grievances and<br>complaints, and 76% report having arrangements for<br>submitting complaints and/or grievances<br>anonymously. Five Group companies reported<br>incidents of discrimination in 2010, which were dealt<br>with in accordance with the Holcim Code of Conduct.  | Link to employment practices section on the website |
| <ul> <li>Inclusion of minimum labour<br/>standards in contracts with<br/>suppliers and other relevant<br/>business partners</li> <li>Audits or other steps to monitor and<br/>improve the labour performance of<br/>companies in the supply chain</li> </ul> | Holcim is working on developing and implementing a<br>Sustainable Procurement Initiative, which will include<br>amongst other things a Supplier Code of Conduct<br>and a methodology for identifying and assessing<br>critical suppliers. The process involved internal<br>workshops and interviews with selected external<br>stakeholders. The Initiative is expected to be rolled<br>out in 2012. | Supplier screening data on the Holcim<br>website    |
| Environmental Stewardship<br>Implementation  |   |   |
| 11. Robust commitments, strategies or policies in the area of environmental stewardship  |   |   |
| Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development)  | Holcim's commitment to sustainable development is<br>part of its mission statement and is further<br>demonstrated by its membership in the World<br>Business Council for Sustainable Development and<br>its participation in the UN Global Compact  | Link to environment policy on Holcim website        |

| Criteria   | Holcim commitment   | Links  |
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| <ul> <li>Reflection on relevance of<br/>environmental stewardship for the<br/>company</li> <li>Written company policy on<br/>environmental policy</li> </ul> | Holcim is committed to continuously improve its<br>environmental performance and provide positive<br>contributions to its business and to society.  | Link to environment policy on Holcim website<br>SD materiality review in the CSDR and<br>online  |
| <ul> <li>Allocation of responsibilities and<br/>accountability within the<br/>organization</li> </ul>  | Environmental stewardship is part of the climate<br>change, environment, alternative resources and<br>environmental relations functions with the Holcim SD<br>department  | Link to website page "managing sustainable<br>development"   |
| <ul> <li>Specific commitments and goals for<br/>specified years</li> </ul>   | All environmental commitments and targets are listed in the progress towards targets.   | Progress towards targets - <u>CSDR – see</u><br>page 9   |
| 12. Effective management systems to integrate the environmental principles   |   |  |
| <ul> <li>Environmental risk and impact<br/>assessments</li> </ul>  | CO2 and energy, eco-efficient products, atmospheric<br>emissions, resources management and biodiversity<br>have been identified of high importance and waste<br>and transport as well as water as of medium<br>importance in the SD materiality review. | SD materiality review in the CSDR and online   |
| <ul> <li>Regular stakeholder consultations<br/>on environmental impact</li> </ul>  | Holcim is committed to a continuous process of<br>listening to, and learning from, people and<br>organizations on its environmental impact around the<br>world. This is done through the WBCSD or IUCN's<br>independent expert panel etc.               | In our <u>CSDR</u> please see:<br>Responsible relationships and partnerships<br>in the sections:<br>Sustainable products and sustainable<br>construction – page 10<br>Energy and climate – page 14<br>Resources conservation – page 18 |

| Criteria   | Holcim commitment   | Links   |
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| <ul> <li>Internal awareness-raising and<br/>training on environmental<br/>stewardship for management and<br/>employees</li> </ul>  | Internal awareness-raising and training on<br>environmental stewardship for management is part of<br>internal communication and Holcim's training<br>activities.  | Holcim US conservation days – CSDR page<br>20<br>Developing our people (Holcim website) |
| <ul> <li>Grievance mechanisms,<br/>communication channels and other<br/>procedures (e.g. whistleblower<br/>mechanisms) for reporting concerns<br/>or seeking advice regarding<br/>environmental impacts</li> </ul> | 88% of Group companies have systems to collect<br>and handle employee grievances and complaints,<br>and 76% have arrangements for submitting<br>complaints and/or grievances anonymously.   | Link to employment practices section on the website                                     |
| <ul> <li>Inclusion of minimum environmental<br/>standards in contracts with<br/>suppliers and other relevant<br/>business partners</li> </ul>  | 78% of Holcim Group companies screen local suppliers ensuring that they have an environmental management system in place.   | Supplier screening data on the Holcim<br>website  |
| <ul> <li>Audits or other steps to monitor and<br/>improve the environmental<br/>performance of companies in the<br/>supply chain</li> </ul>  | Holcim is working on developing and implementing a<br>Sustainable Procurement Initiative, which will include<br>amongst other things a Supplier Code of Conduct<br>and a methodology for identifying and assessing<br>critical suppliers. The process involved internal<br>workshops and interviews with selected external<br>stakeholders. The Initiative is expected to be rolled<br>out in 2012. |   |
| <ol> <li>Effective monitoring and evaluation<br/>mechanisms for environmental<br/>stewardship</li> </ol>   |   |   |
| <ul> <li>System to track and measure<br/>performance based on<br/>standardized performance metrics</li> </ul>  | The Plant Environmental Profile self-assessment<br>questionnaire is the source of performance<br>information and data to all other environmental<br>impacts of the cement, aggregates and ready-mix<br>concrete business segments.  | CSDR Methodology section – page 32  |

| Criteria  | Holcim commitment   | Links  |
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|   | Consolidation of CO2 and energy data is consistent with the WBCSD/WRI cement CO2 protocol.  |  |
| <ul> <li>Leadership review of monitoring<br/>and improvement results</li> </ul>   | SD committees supports the overall decision-making process and propose key issues to the Executive Committee  | Managing sustainable development, (SD website)   |
| 14. Standardized performance indicators<br>(including GRI) on environmental<br>stewardship                                  | A comprehensive list of environmental indicators and<br>Holcims performance against those indicators is<br>available on our website. See link opposite. See also<br>link to the Carbon Disclosure Project where Holcims<br>submission may be downloaded.  | SD performance data 2010 (Download pdf<br>from right hand column)<br>Link to Carbon Disclosure Project |
| Outcome of audits or other steps to<br>monitor and improve performance<br>in the supply chain                               | Holcim is working on developing and implementing a<br>Sustainable Procurement Initiative, which will include<br>amongst other things a Supplier Code of Conduct<br>and a methodology for identifying and assessing<br>critical suppliers. The process involved internal<br>workshops and interviews with selected external<br>stakeholders. The Initiative is expected to be rolled<br>out in 2012. | Supplier screening data on the Holcim<br>website   |
| Anti-Corruption Implementation  |   |  |
| 15. Robust commitment, strategies and policies in the area of anti-corruption   |   |  |
| Reference to relevant international conventions and other international instruments (e.g. UN Convention Against Corruption) | Holcim applies the highest standards of business<br>conduct. The Holcim Code of Conduct provides the<br>guiding principles against which to make decisions.<br>This commitment is further demonstrated by its<br>membership in the World Business Council for<br>Sustainable Development and its participation in the<br>UN Global Compact.   | Holcim Code of Conduct   |
| Reflection on relevance of anti-  | Holcim applies high standards to corporate  | Holcim Code of Conduct   |

| Criteria  | Holcim commitment   | Links  |
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| corruption for the company  | governance. Since 2004, binding for the entire group, the Code of Conduct defines Group-wide standards of business behavior expected of all staff.  | See comment on VCCE – page 7                     |
| Written company policy on anti-<br>corruption (e.g. in code of conduct)   |   |  |
| Allocation of responsibilities and<br>accountability regarding corruption<br>within the organization  | For information regarding the organization see:<br>organization and management  | Holcim website                                   |
| 16. Effective management systems to<br>integrate the anti-corruption principle  |   |  |
| Risk and impact assessments in the area of anti-corruption  | Corporate governance has been identified as an issue of high importance in business risk management and in the SD materiality review  | SD materiality review in the CSDR and online     |
| Regular stakeholder consultations     in the area of anti-corruption  | The Holcim External Report Review Panel has<br>identified employment practices as an issue of high<br>importance in Holcim's SD materiality review.   | SD materiality review in the CSDR and online     |
| Internal awareness-raising and<br>training on anti-corruption efforts for<br>management and employees   | Holcim has introduced a centrally coordinate training program in this area.   | See comment on VCCE – page 7                     |
| Grievance mechanisms,<br>communication channels and other<br>procedures (e.g. whistleblower<br>mechanisms) for reporting concerns<br>or seeking advice on corruption  | 88% of Group companies report having systems to collect and handle employee grievances and complaints, and 76% report having arrangements for submitting complaints and/or grievances anonymously.  |  |
| <ul> <li>Inclusion of minimum anti-<br/>corruption standards in contracts<br/>with suppliers and other relevant<br/>business partners</li> <li>Audits or other steps to monitor<br/>corruption and improve the<br/>performance of companies in the</li> </ul> | Holcim is working on developing and implementing a<br>Sustainable Procurement Initiative, which will include<br>amongst other things a Supplier Code of Conduct<br>and a methodology for identifying and assessing<br>critical suppliers. The process involved internal<br>workshops and interviews with selected external<br>stakeholders. The Initiative is expected to be rolled | Supplier screening data on the Holcim<br>website |

| Criteria   | Holcim commitment  | Links  |
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| supply chain   | out in 2012.   |  |
| 17. Effective monitoring and evaluation<br>mechanisms for the integration of anti-<br>corruption | The Holcim Code of Conduct covers all aspects of<br>our operations, including specific provisions on<br>bribery and corruption. Group companies are<br>responsible for ensuring that their managers and<br>employees are aware of their responsibilities under<br>the code and for implementing appropriate measures.<br>These include training and information sessions,<br>integration of the code provision into contracts and a<br>requirement for employees to sign the code. | Holcim Code of Conduct                           |
| Process to deal with incidents   | The code is very clear – violations will not be<br>tolerated. Non compliance with the code may be<br>subject to disciplinary sanctions including termination<br>of employment; and this is explicitly stated within the<br>code.   |  |
| 18. Standardized performance indicators (including GRI) on anti-corruption                       | See link to GRI content index opposite which contains a comprehensive list of GRI indicators.  | GRI content index.                               |
| Value Chain Implementation   |  |  |
| 19. Implementation of the Global Compact principles in the value chain                           | Holcim is working on developing and implementing a<br>Sustainable Procurement Initiative, which will include<br>amongst other things a Supplier Code of Conduct<br>and a methodology for identifying and assessing<br>critical suppliers. The process involved internal<br>workshops and interviews with selected external<br>stakeholders. The Initiative is expected to be rolled<br>out in 2012.  | Supplier screening data on the Holcim<br>website |
| <ul> <li>Audits/screening for compliance in<br/>the value chain</li> </ul>                       | See link opposite  | Supplier screening data on the Holcim website    |

| Criteria   | Holcim commitment | Links  |
|--|-------------------|--|
| Transparency and Verification  |                   |  |
| 20. Information on the company's profile and context of operation  |                   |  |
| Legal structure, including any group<br>structure or ownership   | See link          | Corporate Governance section in the Annual Report. (See page 87)               |
| <ul> <li>Countries where the organization<br/>operates, with either major<br/>operations or operations that are<br/>specifically relevant to sustainability</li> </ul> | See link          | Link to Annual Report. (See page197)   |
| <ul> <li>Markets served (including<br/>geographic breakdown, sectors<br/>served, and types of<br/>customers/beneficiaries)</li> </ul>                                  | See link          | Link to Annual Report. (See page 7 and also<br>business reviews pages 53 -86)  |
| <ul> <li>Primary brands, products, and/or services</li> </ul>  | See link          | Link to Annual Report. (See page197)   |
| <ul> <li>Direct and indirect economic value<br/>generated for various stakeholders<br/>(employees, owners, government,<br/>lenders, etc.)</li> </ul>                   | See link          | Link to Economic impact along the value<br>chain graphic on the Holcim website |
| 21. High standards of transparency and disclosure  |                   |  |
| <ul> <li>COP uses the Global Reporting<br/>Initiative Sustainability Reporting<br/>Guidelines</li> </ul>   | Yes – See link    | GRI content index.   |
| <ul> <li>COP qualifies for Level A+ of the<br/>GRI application levels</li> </ul>   | CSDR 2009         | CSDR   |

| Criteria  | Holcim commitment | Links   |
|---|-------------------|---|
| <ul> <li>COP includes comparison of key<br/>performance indicators for the<br/>previous 2-3 years</li> </ul>              | Yes – See link    | SD performance data 2010 (Download pdf<br>from right hand column) |
| 22. Independently verified by a credible third party  |                   |   |
| <ul> <li>Independently verified against<br/>assurance standard (e.g. AA1000<br/>Assurance Standard, ISAE 3000)</li> </ul> | Yes – See link    | CSDR (see assurance statements, page 33 and 34)                   |
| Verified by independent auditors  | Yes – See link    | CSDR (see assurance statements, page 33 and 34)                   |
| <ul> <li>Reviewed by a multi-stakeholder<br/>panel</li> </ul>   | Yes – See link    | Information on the panel – Holcim website                         |