

Holcim advocacy

Frequently asked questions

May 2023

1. Holcim's approach to advocacy and government affairs

What is Holcim's approach to public and industry advocacy?

Holcim engages with public authorities in a transparent and constructive way, on policy issues relevant to its activities. It remains politically neutral, supports freedom of expression and respects other stakeholders' rights to express their opinions and positions.

The Group shares publicly its policy positions and topics of engagement. It is transparent on its membership in coalitions, think-tanks and professional organizations. The Group is committed to giving reliable and up-to-date information to public authorities.

Holcim requires that any third-party that engages with public authorities on its behalf undergo due diligence.

The Group does not make political donations, unless it is expressly permitted under written local laws and applicable Holcim policies and guidelines, and transparently and accurately recorded.

Those principles form part of the Group's Responsible Lobbying and Advocacy Directive. The Directive is applicable to all Holcim employees engaging with Public Authorities.

Who is accountable for advocacy activities at Holcim? How do you make sure your positions are globally aligned?

Employees within Holcim designated to engage with public authorities are clearly identified. In countries, Country CEOs (CCEO) are accountable for Advocacy activities. At the corporate level, the Public Affairs function is under the responsibility of the ExCo member in charge of Communications, Investor Relations & Public Affairs.

The Public Affairs function ensures alignment on policy positions in all parts of the company by sharing on a regular basis position papers and by engaging with the internal lobbying and advocacy network through calls, webinars and newsletters. Positions on policy issues are validated by the relevant internal experts (sustainability, waste management, finance, innovation, etc.):

In 2021, Holcim has led an assessment of the policy positions of its main trade organizations that has shown that there were no major misalignments between the 20 reviewed

organizations and the Group's climate policy positions (see part 3). The review was then updated in 2023 and showed progress on the identified gaps.

What does Holcim advocate for?

Holcim engages with public authorities, international organizations and external stakeholders on issues that are directly related to its activities. The issues that we engage in often depend on the geographical scope of the organizations we are involved in. In many cases, the issues addressed are in support of day-to-day activities and are related to regulations and standards impacting our manufacturing activities (e.g. permitting), market access and product-related regulations and norms.

The Group also engages on longer-term and global public policy issues that are made public in our [Public Policy Positions](#).

How do you ensure that your advocacy is done ethically ?

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 activities on behalf of Holcim, including consultancy and lobbying firms and individuals, must be informed about and agree to compliance with the Supplier Code of Conduct. These entities are subject to the Group's Third Party Due Diligence Directive and Lobbying and Advocacy Directive.

Holcim has a strict [Anti-Bribery & Corruption policy](#) that applies to its lobbying and advocacy activities and forms part of the Group's Responsible Lobbying and Advocacy Directive. Annual training is conducted in countries on the Anti-Bribery & Corruption policy.

To ensure compliance with its policies, the Group has a number of tools and procedures in place such as the Minimum Control Standards and the Integrity Line, as well as a thorough Third Party due diligence procedure.

Holcim enrolls in lobbying and transparency registers where applicable and where it exists. By way of example, Holcim is a participant of the [EU Transparency Register](#), where advocacy activities, priorities and estimated spending in the EU are listed.

2. Relationship with Trade Organizations





What trade associations do you belong to? Are they involved in advocacy?

Holcim is present in over 60 markets globally and we are members of over 200 local business organizations such as chambers of commerce, business councils, professional organizations and trade associations. The major trade associations do advocate on issues linked to public policy, local regulations and building standards. These organizations also

enable networking, research and marketing activities for the products and services of their members.

The list below contains the most significant trade associations and chambers of commerce our Group companies are members of. The list contains the organizations where our membership fee exceeds CHF 100,000 annually. It accounts for more than 80% of total membership fees paid in 2022:

Country	Organization	Country	Organization
Global 	<ul style="list-style-type: none"> • Global Cement and Concrete Association • World Economic Forum • WBCSD 	USA 	<ul style="list-style-type: none"> • National Stone Sand & Gravel Association • National Ready Mixed Concrete Association • American Concrete and Pavement Association • Great Lakes Cement Promotion Council • Polyiso Insulation Manufacturers Association
Spain 	<ul style="list-style-type: none"> • Agrupación De Fabricantes De Cemento (Oficemen) • Instituto Español del Cemento y sus Aplicaciones (IECA) 	Poland 	<ul style="list-style-type: none"> • Stowarzyszenie Producentów Cementu
Greece 	<ul style="list-style-type: none"> • Hellenic Cement Industry Association 	France 	<ul style="list-style-type: none"> • UNICEM • Syndicat Français de l'Industrie Cimentière
Switzerland 	<ul style="list-style-type: none"> • Cemsuisse • Economiesuisse • Fachverband der Schweizerischen Kies- und Betonindustrie 	Romania 	<ul style="list-style-type: none"> • CIROM
Germany 	<ul style="list-style-type: none"> • Verein Deutscher Zementwerke • VERO • Informationszentrum Beton (IZB) • Cement & Beton Centrum (Netherlands) • Industrieverband Steine und Erden 	Belgium 	<ul style="list-style-type: none"> • Febelcem • FEDIEX
UK 	<ul style="list-style-type: none"> • Mineral Products Association • Confederation of British Industry 	Austria 	<ul style="list-style-type: none"> • Vereinigung Österreichischer Zementwerke (VÖZ)

<p>Philippines</p> 	<ul style="list-style-type: none"> • Cement Manufacturers Association of the Philippines 	<p>Canada</p> 	<ul style="list-style-type: none"> • Cement Association of Canada • Ontario Stone and Gravel Association • Northwest Cement Council
<p>Italy</p> 	<ul style="list-style-type: none"> • AITEC/FEDERBETON 	<p>Australia</p> 	<ul style="list-style-type: none"> • Cement, Concrete & Aggregates Australia

In addition, to the above list, we are associated with the European cement association, CEMBUREAU, through our memberships of local European cement associations.

[How do you ensure that the advocacy positions taken by your trade associations are aligned with your own stated positions? What do you do if you find your positions and the positions of your trade associations are not aligned?](#)

CCEOs and employees that are active in trade associations that we are members of or associated with are systematically engaging in a way that reflects Holcim’s positions and ambitions. Holcim works to ensure that the positions of these organizations are aligned to its own but it also works in full respect of the governance rules in place in all trade associations. Should major divergences in position appear, Holcim will dissociate itself from the trade association’s position and related activities, or in extreme cases, renounce its mandates within the organization and/or its membership. In 2021, following a careful review assessment of its organizations in the USA, Holcim decided to leave an industry organization due to misalignments on climate positions.

[How much do you spend on advocacy?](#)

Holcim Group companies reported spending c. CHF 1.4 million on direct advocacy activities in 2022. The issues they advocated for included:

- Global issues such as the climate and circular economy agenda
- Local / regional regulatory and permitting issues linked to our activities, assets and products
- Waste management
- Sustainable construction
- Infrastructure & housing development
- Research & Innovation
- Product standards & norms

Total membership fees paid by the Group to trade associations, chambers of commerce and other business organizations in 2022 amounted to CHF 18 million. A large portion of the

membership fees paid are used by the associations for administration and running costs, member services, marketing, research and public relations. We estimate that approximately one third of the fees we paid was used by the associations for advocacy purposes.