

Occupational Health & Safety Policy



At Heidelberg Materials, we take our social responsibility seriously and believe that a corporate culture based on partnership with employees, contractors, and communities, will lead to the long-term success of the Company. As part of this responsibility, occupational Health & Safety, remains a core value of our Company.

Taking care of our employees, contractors, and communities, is an integral part of our business activities and an important part of our “2030 Commitment”. Convinced, that injuries, occupational illnesses, mental health, and diseases are preventable, we are continuously striving to minimize risks to our employees, contractors, and communities, in our pursuit of zero harm.

Scope

This Policy applies to all locations and operations of the Heidelberg Materials Group, where we exercise management control.

Commitment

To continually improve our performance, we manage Health & Safety through appropriate management systems. The key elements are:

- Establishing clear objectives and corresponding action plans
- Providing safe and healthy workplaces, equipment, work procedures, and practices, based on the results of regularly reviewed risk assessments.
- Coaching and training employees to identify and eliminate Health & Safety risks that affect their work, and to ensure they have the competencies to conduct their tasks safely
- Inspecting and reviewing work areas and practices to ensure compliance with internal and external requirements

- Monitoring and analyzing the Health & Safety performance, and processes to meet or exceed internal and external requirements
- Providing our customers and communities with guidance and instructions for the safe and sustainable use of our products

Heidelberg Materials is committed to conducting its business in accordance with all applicable local, regional, national, and international legislation, and our internal Health & Safety Standards and procedures. We work together with our key stakeholders to prevent incidents that may cause injuries or occupational illnesses, and to keep the public informed about our Health & Safety performance.

Roles and responsibilities

The Managing Board of Heidelberg Materials is responsible for providing leadership and the necessary resources, to ensure the requirements of this Policy are met.

Every manager is responsible for providing visible Health & Safety leadership, ensuring that effective arrangements to deliver these requirements, are established and implemented. Every employee and contractor is responsible and accountable for working safely, complying with all Health & Safety rules, standards, procedures, reporting safety hazards or unsafe work practices, and have the responsibility, and authority, to stop any work, where they or any person, is at immediate risk of death or serious injury.

A handwritten signature in black ink, appearing to read 'D. Achten'.

Dominik von Achten
Chairman of the Managing Board



Policy Statement on Human Rights - Heidelberg Materials

Scope: Heidelberg Materials AG and all companies directly or **i**ndirectly controlled by it
Approver: Managing Board
Issued: 26 July 2023

Table of Contents

1. Statement of Commitment	3
1.1. Scope and Overall Strategy	3
1.2. Guiding Principles	4
1.3. Expectations Towards our Managers, Employees, and Business Partners	4
2. Core Objectives	4
2.1. Prohibition of Child Labour	5
2.2. Prohibition of Forced Labour and all Forms of Slavery	5
2.3. Occupational Health and Safety	5
2.4. Freedom of Association	6
2.5. Equality in the Workplace	6
2.6. Appropriate Remuneration for Work	6
2.7. Respect for Land Rights	7
2.8. Lawful Use of Private and Public Security Forces	7
2.9. Environmental and Climate Protection	7
3. Managing Human Rights and Environmental Obligations	7
3.1. Governance Structure and Due Diligence Processes	8
3.2. Risk Analysis	11
3.3. Preventive and Remedial Measures	15
3.4. Grievance Mechanism	16
3.5. Effectiveness Review	16
3.6. Documentation and Reporting	16
4. Amendments and Updates	17
5. Policy Adoption	17

1. Statement of Commitment

1.1. Scope and Overall Strategy

Heidelberg Materials AG, collectively with its subsidiaries around the world, (“**Heidelberg Materials**”) is one of the world’s largest integrated manufacturers of building materials and solutions with leading market positions in cement, aggregates, and ready-mixed concrete. Furthermore, we produce other composite materials such as asphalt and precast concrete elements. Heidelberg Materials has operations in more than 50 countries on four continents and has around 51,000 employees at almost 3,000 locations. It has business relations with more than 120,000 suppliers worldwide. Our products and services are used to construct buildings, infrastructure, commercial and industrial facilities.

As parent company of a global group, we are aware of the impact we can have on human rights and the environment and we accept the responsibility that comes with it. This Policy Statement sets out our human rights strategy and applies to all Heidelberg Materials companies. It encompasses our commitment to responsible corporate governance, guiding principles and main objectives with regard to human rights and the environmental, including the promotion of diversity, equity, and inclusion, as well as the protection of the climate and the environment.

We are aware of the significant contribution that our industry can make to the economic aspects of the United Nations Sustainable Development Goals (SDGs). In this regard, Heidelberg Materials creates jobs and promotes local economic development with locally paid wages, investments, purchases, and taxes, particularly in economically weak regions. We are also aware of the risks of our business activities for some aspects of the 2030 Agenda for Sustainable Development, such as the environment and climate change, land rights, health, and wellbeing. In this context, our Sustainability Commitments 2030 guide the sustainability strategy of Heidelberg Materials. They cover topics under four headings: Net Zero, Circular & Resilient, Nature Positive, and Safe & Inclusive. The SDGs shape our strategy, which aligns with UN Guiding Principles on Business and Human Rights and other initiatives¹.

The path for Heidelberg Materials to adequately contribute to human rights starts by identifying its adverse impacts and correlating them with goals and targets. The due diligence process adopted by our company and how we manage our negative impacts, both preventively and correctively, allows us to avoid or eliminate the impacts of our business activities on the people and the environment. And over time, it will enable us to contribute positively to upholding human rights while, with the lessons learned, promoting good governance in these areas, ultimately contributing to the realisation of the SDGs.

¹ Initiatives like the OECD Guidelines for Multinational Enterprises and the German Act on Corporate Due Diligence in Supply Chains.

1.2. Guiding Principles

Heidelberg Materials' commitment to respect human rights in our business area and the supply chain is aligned with the Universal Declaration of Human Rights and the UN Guiding Principles for Business and Human Rights. To cover human rights and environmental impacts that our activities might cause directly or indirectly, we use global values and internationally recognised standards as guidance, in particular:

- The International Covenant on Civil and Political Rights.
- The International Covenant on Social, Economic and Cultural Rights.
- The core labour standards of the International Labour Organization (ILO); including, but not limited to, (i) the right to enjoy just and favourable conditions of work, including earning a living wage, (ii) the right not to be subject to forced or compulsory labour or child labour, (iii) the right to freedom of association and assembly as well as the rights to organise and collective bargaining, and (iv) the right of non-discrimination at work.
- The OECD Guidelines for Multinational Enterprises.

In all countries where national laws, rules, or customs deviate from international human rights standards, we will make every effort to observe the underlying principles reliably and adequately. As a minimum, we comply with applicable laws and regulations as the legal basis of our business activity. Also, for our operations in countries experiencing armed conflicts, we conduct our activities conflict-sensitively according to the standards set by International Humanitarian Law. As a Germany-based enterprise, we comply with the obligations set forth in the German Act on Corporate Due Diligence Obligations in Supply Chains (*Gesetz über die unternehmerischen Sorgfaltspflichten in Lieferketten*).

1.3. Expectations Towards our Managers, Employees, and Business Partners

All Heidelberg Materials companies, its directors, executives and employees shall always comply with the principles laid out in this Policy Statement. We expect all our stakeholders and business partners, including our suppliers and joint venture partners, to act in ways that meet fundamental human rights and environmental responsibilities stated in this policy and to address human rights and environmental violations that they may cause or contribute to. With regards to our suppliers, we expect them to commit to pass on such expectations and obligations to their own suppliers.

2. Core Objectives

At Heidelberg Materials, we are fully committed to avoid causing or contributing to adverse human rights and environmental impacts by action or omission through our own operations or supply chain and addressing such impacts. Our efforts focus on our own sites and employees as well as on employees of our business partners, particularly our suppliers, and the people and communities surrounding our sites. We acknowledge that vulnerable groups, such as women, children, refugees, indigenous peoples, young workers, migrant workers, disabled persons, elderly persons, members of the LGBTIQ+

community, and other minority groups, may be adversely affected. We are committed to ensure that we do not adversely affect their rights in relation to our operations and supply chain.

To properly fulfil our duty, we commit to come in line with the following rights standards in the following areas.

2.1. Prohibition of Child Labour

Around 160 million girls and boys are in child labour, their childhood, potential, and dignity. We to ensure that we do not adversely affect their rights in relation to our operations and supply chain. This includes all forms of slavery or practices such as prostitution and other activities harmful to children, particularly the production and trafficking of goods and services, and the number of hours a week they work, and the standards of the International Labour Organization (ILO) national law and the standards of the International Labour Organization (ILO).

2.2. Prohibition of Forced Labour and

Forced or compulsory labour affects more than 25 million people worldwide. Heidelberg Materials often present in industries with informal work. Heidelberg Materials rejects any form of (modern) slavery, such as extreme economic exploitation, including forced or compulsory labour. This includes any work or service that is required from a person who has not voluntarily agreed to it, and for which the person has not voluntarily agreed to it. This includes any work or service that is required from a person who has not voluntarily agreed to it, and for which the person has not voluntarily agreed to it. Heidelberg Materials demands that employment contracts be maintained voluntarily. Employees have freedom of movement and exit the work premises and shall be free to leave at any time without notice.

2.3. Occupational Health and Safety

Taking care of our employees, contractors and subcontractors is a top priority. We are convinced that injuries, occupational diseases and diseases are preventable, we are committed to ensuring the health and safety of our employees, contractors and communities, in all our operations. We are committed to conducting our business in accordance with applicable national and international legislation as well as industry standards and procedures.

2.4. Freedom of Association

The building materials industry has been a leader in promoting freedom of association and collective bargaining. We are committed to recognising the right of our employees, contractors and communities to form and join trade unions, the right to strike and the right to collective bargaining.

community, and other minority groups, may require our special consideration to ensure that we do not adversely affect their equal and effective enjoyment of human rights in relation to our operations and supply chains.

To properly fulfil our duty, we commit to comply with internationally recognised human rights standards in the following areas.

2.1. Prohibition of Child Labour

Around 160 million girls and boys are in child labour worldwide, deprived of schooling, their childhood, potential, and dignity. We take a clear position against child labour. This includes all forms of slavery or practices similar to slavery, child trafficking, child prostitution and other activities harmful to the health, safety, or morals of children, particularly the production and trafficking of drugs. The minimum age for employment, activities, and the number of hours a week shall be determined in accordance with national law and the standards of the International Labour Organization.

2.2. Prohibition of Forced Labour and all Forms of Slavery

Forced or compulsory labour affects more than 27 million people in the world. It is often present in industries with informal workers, and unfortunately, it is not easy to identify. Heidelberg Materials rejects any form of forced labour as well as any form of (modern) slavery, such as extreme economic or sexual exploitation and degradation. This includes any work or service that is required of a person under threat of punishment and for which the person has not voluntarily made himself or herself available, for example, as a result of violence, intimidation, debt bondage, retention of identity papers, threats of denunciation to immigration authorities or human trafficking. Heidelberg Materials demands that employment relationships are only entered into and maintained voluntarily. Employees have freedom of movement, the right to freely enter and exit the work premises and shall be free to leave employment after reasonable notice.

2.3. Occupational Health and Safety

Taking care of our employees, contractors and communities is an integral part of our business activities. Convinced that injuries, occupational illnesses, mental health issues and diseases are preventable, we are continuously striving to minimise risks to our employees, contractors and communities, in our pursuit of zero harm. We are committed to conducting our business in accordance with all applicable local, regional, national and international legislation as well as our internal Health & Safety standards and procedures.

2.4. Freedom of Association

The building materials industry has been associated with infractions on the right to freedom of association and collective bargaining. We, at Heidelberg Materials, stand for social dialogue and recognise the right of workers to freely associate in or join trade unions, the right to strike and the right to collective bargaining. We acknowledge