

Code of Ethics
Cementir Holding N.V.

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1 INTRODUCTION

1.1 Purpose

The Cementir Group, defined as Cementir Holding N.V. (the "Parent Company") and its subsidiaries (hereinafter the "Group"), has decided to adopt the present Code of Ethics (hereinafter the "Code") to conform and conduct its business activities following principles of integrity, honesty and confidentiality and in accordance with laws and regulations of Countries in which operates. The Code promotes the correct and efficient use of resources in the perspective of corporate, social and environment responsibility, to reconcile the search for competitiveness in the Cementir Group market with respect for rules on competition.

To achieve this goal, the Cementir Group requires its employees to be in compliance with the highest standards of business conduct in the performance of their duties, as set for in this Code and in procedures to which it refers. For these reasons, the Group:

- guarantees that employees who reports any violations of the Code will not be subjected to any form of retaliation;
- takes fair sanctions commensurate to the type of violation of the Code, and guarantees its application to all the categories of employees, keeping into account laws, contracts and regulations applicable in the Country in which operates;
- controls periodically the compliance with the Code.

1.2 Compliance with Italian Legislative Decree 231/2001 ("previously applicable regulation")

The Code of Ethics represented a general and mandatory principle of the Organizational and Control Model adopted by the Cementir Group Companies, in compliance with Italian Legislative Decree of June 8th, 2001, no. 231, regarding the "liability of legal entities for administrative offenses resulting from a crime", then applicable to the Parent Company, as an Italian based company. The continued application of this Code of Ethics, following the conversion of the Parent Company into a Dutch legal entity is not intended to and does subject the Parent Company or the Group to the previously applicable regulation in any manner whatsoever.

The expression "Organizational, Management and Control Model" is meant to refer to a set of rules, including this Code of Ethics and any other remedy applicable in case of the event of an offense and functional to provide each Company with an effective Organizational, Management and Control system.

2 GENERAL SPECIFICATIONS

2.1 Scope of application

The Code applies in all the countries in which the Group operates and is brought to the attention of all employees in an accessible place, in the manner most appropriate to local standards and customs and is freely available on the Group website (www.cementirholding.com).

The responsibility of the managers is to satisfy the values and principles contained in the Code by assuming responsibility internally and externally and strengthening trust, cohesion and team spirit. The Group's employees, already subject to compliance with the law and regulations, will adjust their actions and behavior to the principles, objectives and commitments required by the Code. The members of the Board of Directors aspire to the principles set forth by the Code in setting corporate objectives.

2.2 Control and Guaranties

The supervision of the compliance with the Code is entrusted to Cementir Holding Ethics Committee (the "E.C."), composed of the Chief Internal Audit Officer and the Group General Counsel. The E.C. performs the following activities:

- checks the diffusion of the Code to all recipients, proposing possible actions regarding information and training;
- proposes to the Board of Directors the necessary adjustments to guarantee the Code effectiveness and its eventual updating, following laws change;
- provides support for the interpretation of the Code;
- controls and evaluates any cases of violation of the Code, and communicates those violations to the Function in charge, for the application of sanctions in compliance with laws and Labour contracts applicable;
- follows up on eventual reports regarding violations of the Code, protecting and supporting anybody who reports those to the E.C., ensuring the identity and information confidentiality;
- draws up an annual report for the Board of Directors regarding the application process of the Code, showing plans and initiatives that have been carried for the achievement of the institutional scopes;

Names and addresses of the E.C. members are available on the website www.cementirholding.com. People and collaborators must promptly report any violations of the Code to their managers, Chief Internal Audit Officer or directly to the E.C.

2.3 Communication of the Code and training

The Group is actively involved in the distribution of the Code to ensure its full application and constant updating in relation to economic, financial and commercial evolutions in the activities of the Group, along with changes in its organizational or management structure, and in relation to violations detected through supervision controls.

3 ETHICAL AND CONDUCT PRINCIPLES

3.1 Vision and values

Group operates primarily in the production and sale of cement and concrete. The ability to create synergies with the other subsidiaries allows the Group Companies to improve their economic performance by increasing the added value for stakeholders.

The ability to propose, model, and implement highly integrated innovative and complex technology solutions, starting from understanding the real territory and customer needs, is an integral part of the Group's strategy.

Each Company anticipates technologies and standards to produce more and more limited impacts; innovates and transforms each new plant acquired or built - in any country - according to the highest standards for the protection of workers, the environment and the communities in which the plant is located.

In terms of social responsibility, the Group devotes significant resources to various aspects of life of the communities where it operates: promotes studies; works with government; protects the historical and monumental heritage; sponsors culture and entertainment of social life; intervenes to repair existing environmental damage.

3.2 Ethics, Transparency, Fairness, Professionalism

The Group, in business dealings, is inspired by and observes the principles of loyalty, fairness, transparency, efficiency and market orientation, regardless of the importance of the deal.

All actions, transactions and negotiations carried out and, more generally, the people behavior in their daily tasks, are inspired by the highest accuracy, the completeness and transparency of information, the legitimacy,

both in form and substance, and the clarity and accuracy of accounting records in accordance with regulations and internal procedures.

Recipients of the Code, in full respect of the principle of good faith, work with impartiality in carrying out their activities to guarantee the principle of independence of judgment and the absence of any commercial or financial interest which might determine unequal treatment.

With regard to relations with all counterparties, all forms of discrimination based on age, racial or ethnic origin, nationality, political opinions, religious beliefs, gender, sexuality or health situation are forbidden. Bribes, illegitimate favors, collusion, requests, directly and / or through third parties, with personal benefits for oneself or for others, are prohibited without any exception.

Each Recipient must act fairly and in good faith, respecting the obligations entered into contracts and providing the required performance, and must also know and observe the contents of this Code of Ethics, basing their conduct on respect, cooperation and mutual collaboration. Each employee who makes transactions involving money, goods or other items of economic value owned by the Company, must provide appropriate evidence to allow the verification of these transactions.

In case of any possibility of doubt, or need for further clarification should consult their supervisor and the Ethics Committee.

3.3 Conflicts of interest

In carrying out all activities, each recipient of the Code works to avoid running into real or even merely potential conflicts of interest. Among the hypotheses of "conflict of interest", in addition to those defined by law, it is understood that the case in which a person works to satisfy an interest other than that of the individual Company of the Group and its stakeholders to gain an advantage for themselves or third parties is also included.

By way of example, conflicts of interest may result in but are not limited to the following situations:

- have economic and financial interests (possession of a significant amount of shares, professional appointments etc.) through family members, customers, suppliers or competitors;
- carry out work, even by family members, customers, suppliers or competitors;
- accept money, gifts or favors of any kind by persons, companies or entities that are or intend to enter into business relationships with the Group;
- use ones position in the company or the information acquired to create a conflict between one's own interests and those of the company;
- buy or sell shares (of the Group or external) when, in relation to one's job, they are aware of material information not yet available to the public.

The Recipients of the Code of Ethics are required to:

- Avoid actions or relationships that may be or appear to be in conflict with the obligations or interests arising from the various departments of each Group Company;
- evaluate the advantages and disadvantages that may result to the Company and the Group at the time of accepting a job in another company;
- follow the specific procedure of the Group, which governs the corporate relationships with related parties;
- report to the supervisor, if an employee, or to the internal referent, if a third party, along with the E.C. any situation that may assume a potential conflict of interest.

3.4 Competition, Money Laundering, and Control on Exports

The Group considers the respect of competition as an essential tool for the development of the economic system and, therefore, adheres in all of its activities with national, EU and international rules where it operates.

Employees shall never be engaged or involved in activities that involve laundering (acceptance or processing) of proceeds from criminal activities in any form or manner.

Moreover, the Group shall check in advance the available information (including financial information) on business partners and suppliers, in order to ascertain the respectability and legitimacy of their activity before establishing any business relationship.

The Group must always comply with anti-money laundering laws in any jurisdiction.

In the case of embargo legislation discrepancies, after consultation with the Legal Department, the matter shall be submitted to the decision of the legal representative of the Group company concerned.

3.5 Confidential information and Privacy Policy

The expertise developed by the Cementir Group is a fundamental resource that every employee and recipient must safeguard. In fact, in the event of improper disclosure of such knowledge, the Group could suffer damage to both assets and image.

Therefore, employees and other recipients are required not to disclose any information regarding the technical, technological and commercial expertise of the Group, as well as other non-public information relating to the Group, except in cases where such disclosure is required by law or other regulatory provisions, or where it is expressly provided for by specific contractual agreements with counterparties that have committed to use it only for the purposes for which such information is transmitted, and to maintain its confidentiality.

The confidentiality obligations set out in the Code of Ethics shall continue after the termination of the employment relationship.

In response to each request for confidential business information and data from external parties, each recipient of this Code is required to address the request to the competent corporate functions, refraining from directly or indirectly providing the information.

With regard to confidential information, "privileged" or "price sensitive" information is particularly important, due to the fact that improper or unauthorized distribution can significantly affect the price of financial instruments.

In conducting its business, the Cementir Group collects a significant amount of personal data and confidential information, which it is committed to process in compliance with all applicable laws on confidentiality applicable in the jurisdictions in which it operates and with the leading practices for the protection of confidentiality. Therefore, the Companies of the Cementir Group are committed to protecting, with respect to national laws for the protection of privacy, or local laws relating to the foreign companies, the personal data collected, stored and processed in the framework of its activities in order to avoid improper or misuse.

As part of the proper functioning of the market, it is forbidden to intentionally spread false information both inside and outside the Group, concerning the Group and its employees.

It is also forbidden to carry out any activity with the scope of influencing the financial markets, causing an artificial increase or decrease in the price of securities or other financial instruments.

3.6 Protection of individuals

The Group recognizes the centrality of human resources, with regard to professionalism, dedication, loyalty, honesty and a sense of collaboration, in all countries in which it operates.

The Group offers all employees the same opportunities and expressly prohibits any form of abuse of positions of authority or coordination. For abuse, it is intended any behavior which consists in asking, encourage to offer, services, personal favors or other benefits damaging another's dignity, professionalism and autonomy.

The recipients of this Code of Ethics, as provided by national and international regulations, are required to refrain from engaging in unlawful conduct harmful to individuals, such as, but not limited to, offenses against the person, child labor, trafficking people and child pornography.

The Group carries out its activities in accordance with current national and international legislation for the protection of working conditions, the respect for personal dignity, favoring the consolidation of a culture of safety and health of workers within the workplace through the distribution of adequate information aimed at enhancing awareness of the risks and responsibilities of individual behavior.

3.7 Protection of Health, Safety and Environment

The Cementir Group and its employees are strongly committed to behave in a socially responsible manner, respecting the values of a positive environment and a healthy and safe workplace, ensuring that the cultures and traditions of each country in which it operates are observed and respected.

The relationship with the territory is one of the crucial aspects of the Group's activities, as these activities have an inevitable impact on the surrounding areas. For this reason, the Group puts particular attention to issues related to climate change and emissions into the atmosphere. Knowing how to manage emissions, protect the business from the impacts caused by climate change and protect the health and safety of workers, represent corporate strategies for the Group that create long term value for shareholders.

3.8 Administrative and accounting management

The Group complies with laws and, in general, any applicable regulations relating to the preparation of financial statements and any type of administration and accounting documentation required.

The principle of truthfulness, accuracy, clarity and completeness of information must be absolutely respected in the storage of documents and accounting records.

Group employees who become aware of any omissions, falsifications or negligence regarding accounting records or documentation on which the accounting records are based, are required to report the facts to the E.C.

All recipients are required to provide the maximum cooperation to ensure that the company's operations are properly and timely represented in the accounting.

3.9 Internal Control and Risk Management System

The Group is committed to promoting and maintaining an adequate internal control and risk management system, to be understood as the set of all the instruments necessary or useful to guide, manage and monitor the business activities in order to ensure compliance with the laws and company procedures to protect company assets, to manage efficiently and effectively the processes and to provide accurate and complete accounting and financial data to create added value for all stakeholders.

The responsibility to implement an efficient internal control system is shared by all levels of the organizational structure of the Group; as a result, all the people of the Group, within their functions and responsibilities, are committed to define and actively participate in the proper functioning of the internal control system.

4. ETHICAL STANDARDS TO THIRD PARTIES

4.1 Relations with employees

Every company recognizes the value of human resources, respecting their autonomy and the importance of their participation in the business.

The management of the employment relationship is designed to encourage professional growth and skills of each Recipient in relation to the implementation of these plans.

The Group is committed to ensuring the respect for the conditions necessary for the existence of a collaborative and not hostile work environment, and to prevent discriminatory behavior of any kind. The cooperation of all is required in order to maintain a climate of mutual respect for dignity, honor and reputation.

All forms of favoritism, nepotism or cronyism in selection and recruitment are forbidden.

Each recipient involved in the evaluation of staff undertakes annual objectives, both general and individual, to support a compensation policy based on possible, specific, concrete, measurable and credible objectives in relation to the timing planned to achieve them.

The staff is committed to fulfilling its obligations under the Code of Ethics and must comply with in the performance of their duties, respect for the law and for its conduct to the ethical principles of diligence, good faith, integrity, fairness, loyalty and all those set out in this Code of Ethics.

4.2 Relations with suppliers and external consultants

The Cementir Group defines relationships with its suppliers, in compliance with the regulations and principles of this Code, with due attention to the forefront of industry standards, leading practices in ethics, protection of health and safety and respect for the environment.

The selection of suppliers and the formulation of the conditions for the purchase of goods and services for Group companies are driven by values and parameters of competition, objectivity, fairness, impartiality, fairness in price, quality of goods and/or services, carefully evaluating guarantees of service and the range of offers in general. Procurement processes shall be designed to obtain the maximum competitive advantage for the Group along with fairness and impartiality towards all suppliers who meet the requirements. The cooperation of suppliers in compliance with all the requirements of clients of the Group should be consistently pursued, without limitation, in terms of quality and delivery times. The signing of a contract with a supplier must always be based on extreme transparency, avoiding, where possible, the acceptance of contractual obligations that involve forms of dependence on the contracting Supplier.

It is an obligation of the people of the Group to:

- follow internal procedures for the selection and management of relations with suppliers and external collaborators and abstain from excluding any person meeting the requirements of the possibility of bidding for the supply;
- adopt objective and transparent evaluation criteria in the selection;
- obtain the cooperation of suppliers and external collaborators in consistently ensuring the satisfaction of the needs of clients and consumers to the appropriate extent of their legitimate expectations;
- use as much as possible, in accordance with the laws and criteria of legality of transactions with related parties, products and services provided by Group companies under competitive conditions of the market;
- include in contracts the confirmation of having read the Code and the express obligation to abide by the principles contained therein;
- observe and require compliance with the contractual obligations;
- maintain an open dialogue with suppliers and external collaborators in line with good commercial practices; report promptly to superiors any violations of the Code;
- bring to the attention of the Cementir Group problems that may arise with a supplier or a freelancer, in order to evaluate possible consequences for the Group.

Group employees are forbidden to:

- ask, for themselves or for others, gifts or other benefits, or accept them, except for those of modest value or in accordance with normal commercial practice, from everyone who has taken or that may take benefit from company activities.

4.3 Relations with clients

The Group ensures that their business practices are in compliance with ethical standards and socially responsible conduct in regard to relations with major clients, considering the compliance with ethical standards and applicable laws in the sector in which it operates as essential.

The Group, in carrying out its activities, establishes a relationship with customers with high professionalism and based on availability, respect, courtesy, and offering the maximum cooperation.

In order to protect this relationship, the recipients ensure that their interactions with their clients are aligned with national, European and local laws and regulations and professional codes.

The Group is committed to encourage interaction with its clients through the management and rapid resolution of any complaints and using appropriate communication systems, always in compliance with that agreed upon at the moment of the drafting of the contract.

The Group protects the privacy of its clients, according to the existing regulations, to not communicate or disseminate their personal, economic or consumption data, except as required by law.

It is an obligation for the people of the Group to:

- follow internal procedures for the management of relationships with customers and consumers;
- supply, with efficiency and courtesy, within the limits of contractual obligations, high quality products that satisfy the reasonable expectations and needs of clients and consumers;
- provide sufficient and accurate information about products and services and be truthful in advertising so that clients and consumers can make informed decisions.

It is forbidden for people of the Group to:

- ask for themselves or for others, gifts or other benefits, or accept the latter, except for those of modest value or in accordance with normal commercial practice and courtesy from everyone who has taken or that may benefit from the firm's assets.

4.4 Shareholder relations – Corporate Governance

The Group, creating value, remunerates the risk of partners and shareholders in an appropriate manner, in order to increase the robustness of the company in terms of sustainability in the medium-long term according to the rules of the market and the principles of fairness and transparency.

The Group protects and recognizes the best interests of the Company and those who hold shares in the share capital (shareholders and stakeholders) as a whole, than the specific interests of individual partners, shareholders or groups of them and shuns any action or behavior directed to affect the integrity of the capital and non-distributable reserves, the fictitious capital formation, the unlawful distribution of profits or return of capital, to determine the majorities in the assembly members to procure for oneself or others an unjust profit.

The Parent Company has adopted a system of Corporate Governance in compliance with the applicable rules of law and practices in the field. The Corporate Governance sets out the principles of good governance in order to increase the reliability of the Group, for the protection of all its partners, shareholders and other stakeholders.

5. VIOLATIONS OF THE CODE AND SANCTIONS

Compliance with the provisions of the Code of Ethics is an essential part of the contractual obligations of all the people of the Group in accordance with and for the purposes of applicable law.

Violation of the provisions of this Code of Ethics affects the relationship of trust established with the Group and may lead to the application of appropriate disciplinary action, regardless of criminal legal action. Moreover, in the most severe cases, the failure to comply with the Code of Ethics may constitute just cause for termination of the employment contract or revocation of the mandate with immediate effect. In the latter case, the Companies of the Group will be entitled to compensation for any damage suffered due to the unethical behavior.

The E.C. will immediately start investigating any alleged or potential violation of this Code of Ethics or any related procedure.

Any information will be treated confidentially, in accordance with the interests and legal obligations of the Group.

The E.C., with the support of the internal audit functions, will be in charge of all internal investigations. No person subject to this Code of Ethics may conduct investigations personally.

6 ADOPTION, EFFICIENCY AND AMENDMENTS

This Code of Ethics is adopted by the Board of Directors of Cementir Holding N.V. on November 13, 2019 with immediate effect from that date. Any updates, changes or revisions to this Code of Ethics must be approved by the Board of Directors of Cementir Holding N.V. or else in compliance with the Group policy setting the rules for updating Cementir's procedures and having obtained the required approvals.

7. ANNEXES

7.1 Declaration of acceptance of the Code of Ethics

I, the undersigned within the limits of my job responsibilities declare as follows: 1. I will work honestly, ethically and in the interests of the Cementir Group in all activities; 2. I will avoid actual or apparent conflicts with the interests of the Cementir Group; 3. I will ensure the accuracy and integrity of books, records and accounts of the Cementir Group; 4. I will protect the confidential information that I will come in contact with in the course of my work; 5. I will respect all applicable laws, rules and regulations applicable to my job responsibilities in each country where the Cementir Group operates; 6. I will respect all standards, policies and procedures of the Cementir Group; 7. I will protect the assets of the Cementir Group and promote their efficient and legitimate business use; 8. I will protect the health and safety of employees of the Cementir Group; 9. I will use the tools of the Cementir Group for legitimate business purposes.

I declare to have received, read and understood the Code of Ethics of the Cementir Group and that I will keep to its contents.

Dated, in

Signature

7.2 Questionnaire for compliance with the Code of Ethics

This questionnaire is administered to all recipients of the Code of Ethics, which are identified in line with the provisions of paragraph 2.1 "Scope of application" of the Code. These parties are required to complete and sign this questionnaire in the first contact with the company (hire/first job) and in any case every year.

Conflict of interest

1. During the year 20___, have you ever received, or are you aware of the fact that someone has received from a person or a Company, in business with the Cementir Group, any loan, gift, travel, tip, or other payments that may cause injury or an obligation to the donor, or may be perceived by others as a creation of an obligation to the donor?

Yes No

2. During the year 20___, have you ever participated in or influenced, or know of someone who has participated in or influenced any transaction between the Company and another entity, which set in motion a direct or indirect financial interest in their favor of in favor of a family member¹?

Yes No

3. In 20___, have you had a real financial interest or position of influence, or are you aware of someone who had a real financial interest or a position of influence in a business that provides goods or services to the Cementir Group? (Note: the term "position of influence" refers to all persons who have a position to influence business decisions or actions of the company, such as, for example, a legal representative, a member of the Board of Directors, an executive or a manager, the term "real interest" refers to all persons who may receive a real benefit because of the existence of interest in the counterparty, not necessarily measurable in economic terms).

Yes No

4. In 20___, have you ever used, or are you aware of the fact that someone has used the assets of the company or other resources (including funds, equipment, suppliers or staff) for purposes other than those related to the Company's business or activities sponsored by the Cementir Group?

Yes No

5. During the year 20___, have you ever received, or are you aware of the fact that someone has received gifts or presents from individuals or organizations that have agreements with the Company, including but not limited to loans, cash prizes, discounts or private public not sanctioned by Cementir Group, as well as salaries and related services to illegal activities?

¹ For family, it is intended a family relationship within the sixth degree and the relations of affinity within the fourth degree.

Yes No

6. During the year 20__, have you ever accepted, or know of someone who has accepted from suppliers or potential suppliers any special favor, liable to be embodied in this case due to bribes or rewards aimed at influencing the judgment in favor of that supplier?

Yes No

7. I declare that I am aware of the principles of the Code of Ethics in the theme of "Conflict of Interest". To complement the statement that excludes the possibility of a conflict of interest between the individual and the Cementir Group, please list below all reports and outdoor activities that require specific information, in accordance with the provisions in paragraph 3.3 "Conflicts of Interest" of the Code of Ethics and Group procedure "Transaction with related parties". In particular, it is required to specify the names, addresses, and nature of all relationships among people or entities that have business relationships with the Cementir Group, from which you or a family member have received, directly or indirectly, money or gifts of a symbolic value (over € 200) in the year 20__ (unless the conditions described in this question are met, please fill in the fields in the first line of the table below with N/A).

| Name of the person/name of the Company | Home address / Residency / Registered office | Nature of the relationship / Nature of the external activity |
|--|--|--|
| | | |
| | | |
| | | |

8. During the year 20__, have you been involved or are you aware of entities belonging to the Cementir Group (administrators, legal representatives, staff, employee and manager, project workers, interns, agents, consultants) who have been involved in situations of conflict of interest?

Yes No

Political

9. During the year 20__, have you received, or are you aware of the fact that someone has received payments from Cementir Group in order to provide contributions to political parties, candidates or committees for the election?

Yes No

Securities Trading

10. During the year 20__, have you carried out transactions of sale, or are you aware of the fact that someone has bought or sold securities on the basis of confidential information, or has transmitted this information to others in order to influence the exchange of securities of the Cementir Group?

Yes No

Financial Integrity

11. Do you have knowledge of accounting entries made during the year 20__ in violation of the principles of truthfulness, accuracy, completeness, clarity and validity of the Code of Ethics?

Yes No

12. Do you have knowledge of assets, liabilities or transactions during the year 20__, been unduly omitted from the books of the Company?

Yes No

13. Do you have knowledge of the fact that someone, in the year 20__, has tried to influence a public official, or an entity that engages in business with the Company, while offering money, gifts, goods, services, or favors in exchange for favorable treatment?

Yes No

Other

14. Do you have knowledge that someone within the Cementir Group during the year 20__, has been involved in incidents in conflict with laws, regulations, policies, guidelines, procedures, or ethical principles with respect to those listed in and of suspicions of fraud that you are already aware of? (Note: If you prefer to report an incident or a violation anonymously, answer "NO" to this question and forward the report to the Ethics Committee)

Yes No

15. If the answer to question number 14 is affirmative, indicate the facts / incidents of which you are aware?

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.....
.....

I declare that I have provided all the information in my possession and have reported all situations of which I am aware in a truthful and complete manner.

(Any statement not provided or provided in an incomplete or untruthful manner, subjects the declaring person to possible sanctions and disciplinary actions)

Dated, in

Signature