

Supplier Code of Conduct

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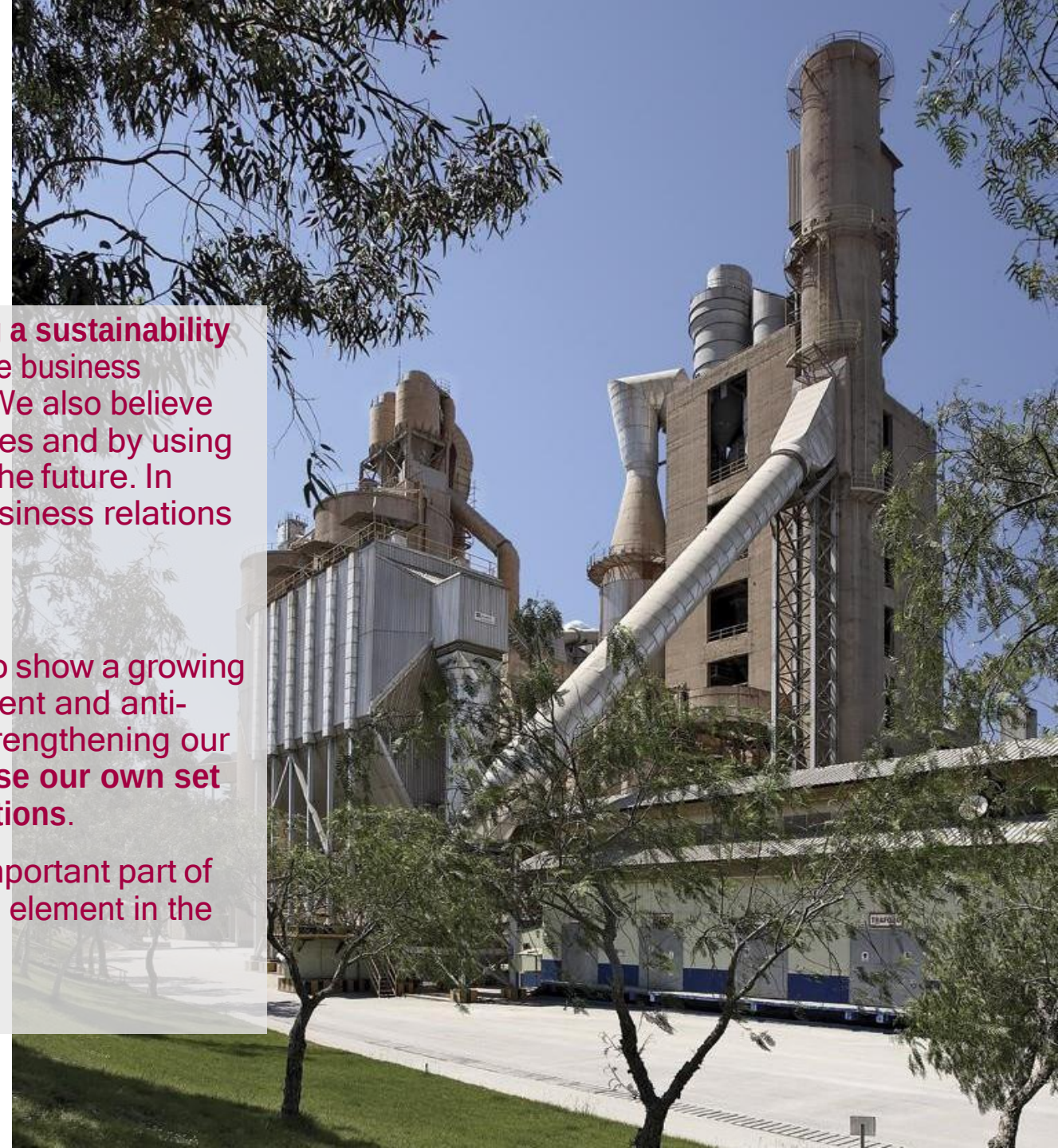


Introduction

We believe that **reducing the environmental impact, creating a sustainability vision and securing the health and safety of our workers** are business strategies that create long term value for our shareholders. We also believe that by collaborating with local organizations and authorities and by using sustainable business models, we will succeed in shaping the future. In addition, we find it important that our activities and our business relations comply with applicable laws and regulations.

Since our customers and a number of other parties seem to show a growing interest in working conditions, labour rights, the environment and anti-corruption and as part of our continued commitment to strengthening our relationships with our suppliers, we have decided to **formalise our own set of rules to increase transparency and highlight our expectations**.

Our set of rules, the Supplier Code of Conduct forms an important part of our **cooperation with our suppliers** and we find it a natural element in the on-going dialogue with our suppliers.



General Requirements

This Supplier Code of Conduct is **applicable to all Cementir Group Procurement suppliers**.

The minimum compliance requirements we expect from our suppliers form the Supplier Code of Conduct.

The **minimum standards** that are set out in this document will be enforced contractually and we expect our suppliers to constantly monitor their own and their suppliers' compliance.



Ethics, Transparency, Fairness, Professionalism

In any business dealings, you must observe the **principles of loyalty, fairness, transparency, efficiency and market orientation**, regardless of the importance of the relevant deal.

All actions, transactions and negotiations carried out by you and, more generally, the conduct of your employees in the carrying out of their daily duties must be based on 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 applicable regulations and internal procedures.

In full respect of the principle of good faith and in compliance with impartiality, you must adhere to the **principle of independence of judgment and the absence of commercial or financial interest**, which might lead to unequal treatment.

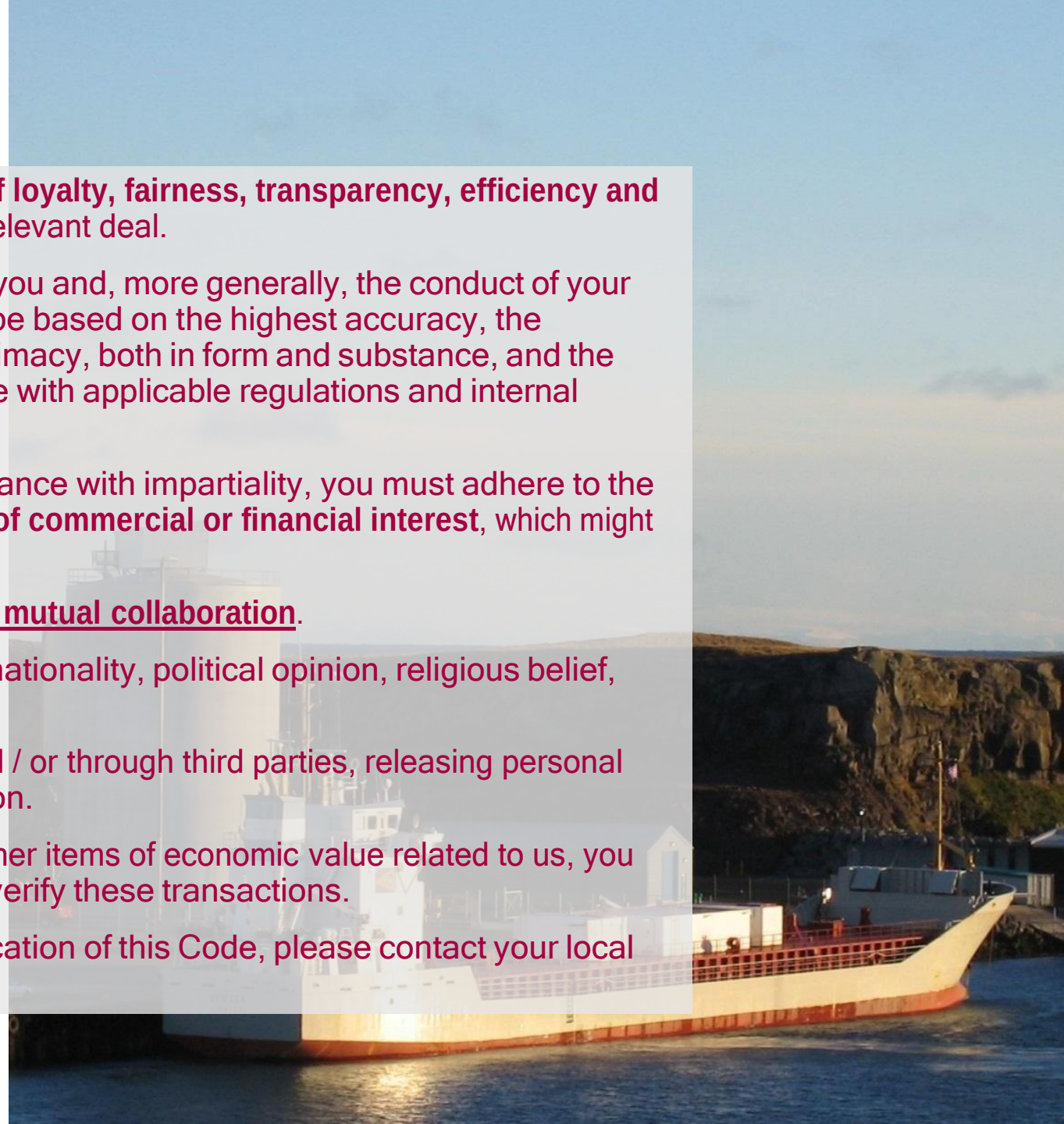
Your conduct must be based on **respect, cooperation and mutual collaboration**.

All forms of discrimination due to age, race or ethnicity, nationality, political opinion, religious belief, gender, sexuality or health are forbidden.

Bribes, illegitimate favors, collusion, requests, directly and / or through third parties, releasing personal benefits to you or others are prohibited without exception.

When you make transaction involving money, goods or other items of economic value related to us, you must provide appropriate evidence, thus allowing us to verify these transactions.

In the event of doubt or should you require further clarification of this Code, please contact your local contact person.



Competition, Money Laundering and Anti-Bribery

We consider the respect of competition as an essential tool in the development of the economic system and, therefore all suppliers' activities must comply with **national, EU and international competition rules in the countries in which suppliers operate.**

Cementir Group is fully committed to **eradicate corruption** from all business transactions. Suppliers must not engage in corruption such as bribery or any form of improper or unlawful payment under any circumstances including financial fraud, money laundering, extortion or facilitation payments.

Suppliers must be able to disclose to Cementir Group sources of primary origin (including the country of origin) associated with the materials supplied to Cementir Group. Cementir Group may request suppliers of selected materials to map their supply chain back to origin to facilitate assessment of upstream supply chain compliance.



Human Rights and Labour standards

Cementir Group is committed to implementing the **United Nations Framework and Guiding Principles on Business and Human Rights** and to have these fundamental principles upheld within our supply chain. We are also committed to conducting our business in line with the principles set out in the Universal Declaration of Human Rights and the **International Labour Organization (ILO)** based on respect for the dignity of the individual without distinction of any kind.

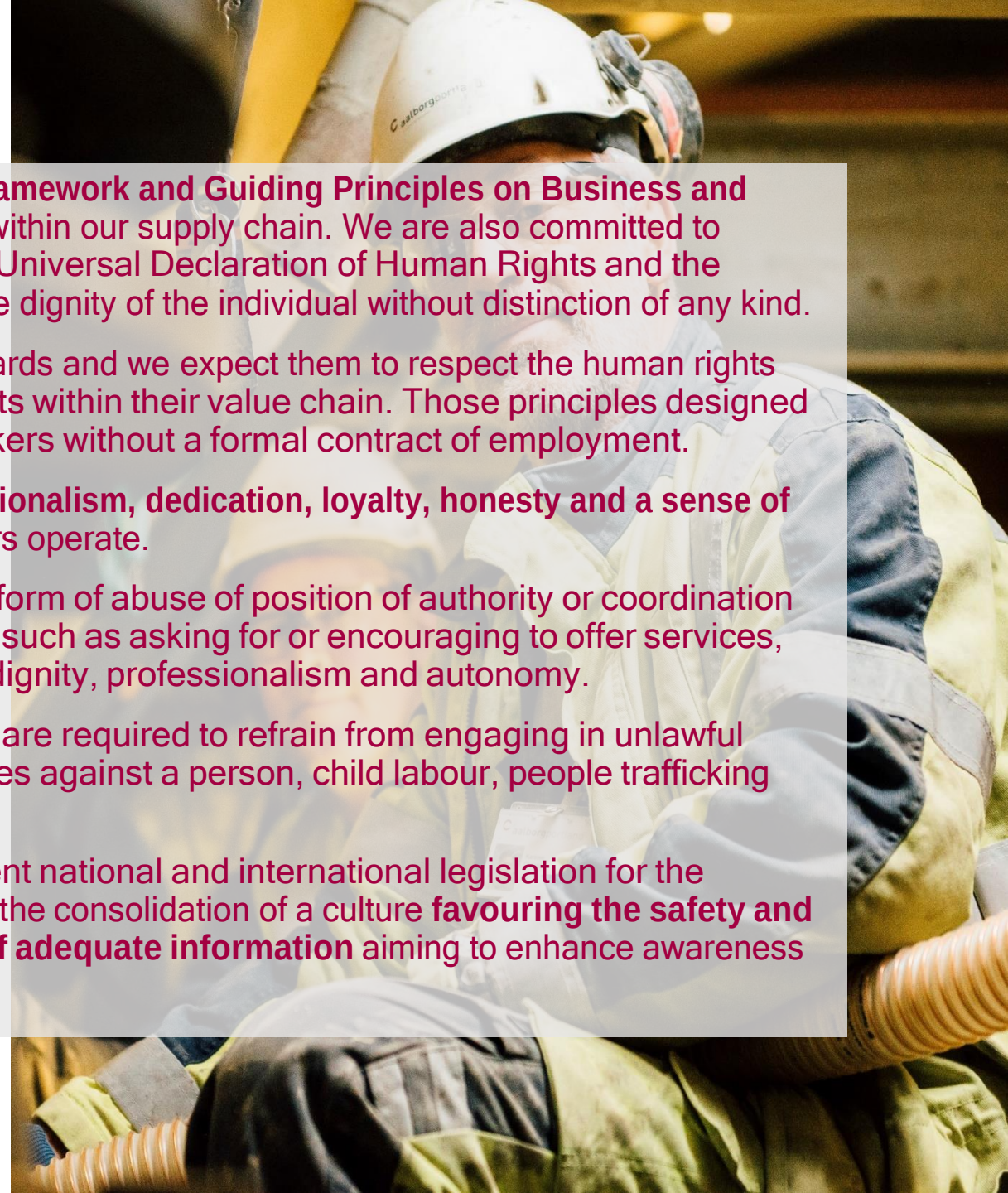
We encourage our suppliers to embrace these international standards and we expect them to respect the human rights of their employees in the workplace, and to promote human rights within their value chain. Those principles designed to cover employees also apply to contract workers and any workers without a formal contract of employment.

We expect our suppliers to recognise that **human resources professionalism, dedication, loyalty, honesty and a sense of collaboration are key values** in all the countries in which suppliers operate.

All employees must be offered the same opportunities, and any form of abuse of position of authority or coordination is strictly prohibited. Abuse in this context means any behaviour such as asking for or encouraging to offer services, personal favours or other benefits harming another individual's dignity, professionalism and autonomy.

As provided by national and international regulations, suppliers are required to refrain from engaging in unlawful conduct harmful to individuals, such as, but not limited to, offenses against a person, child labour, people trafficking and child pornography.

Suppliers must carry out their activities in accordance with current national and international legislation for the protection of working conditions, the **respect of personal dignity**, the consolidation of a culture **favouring the safety and health of workers** within the workplace through the **distribution of adequate information** aiming to enhance awareness of the risks and responsibilities of individual behaviour.



Protection and Disclosure of Information

The expertise we have developed is for us a fundamental resource which must be safeguarded.

Suppliers may therefore **not disclose any information regarding our technical, technological and commercial expertise**, as well as any other non-public information relating to us except where such disclosure is required by law or other regulatory provisions, or where it is expressly provided for through specific contractual agreements with us. The confidentiality obligations must continue after the termination of our business relationship.

If suppliers receive any personal data from us, suppliers must comply with all applicable laws and leading practices for the protection of the **confidentiality** of the data throughout the data lifecycle.



Relations of suppliers with Cementir Holding Group employees

We want to ensure professional business relations between us.

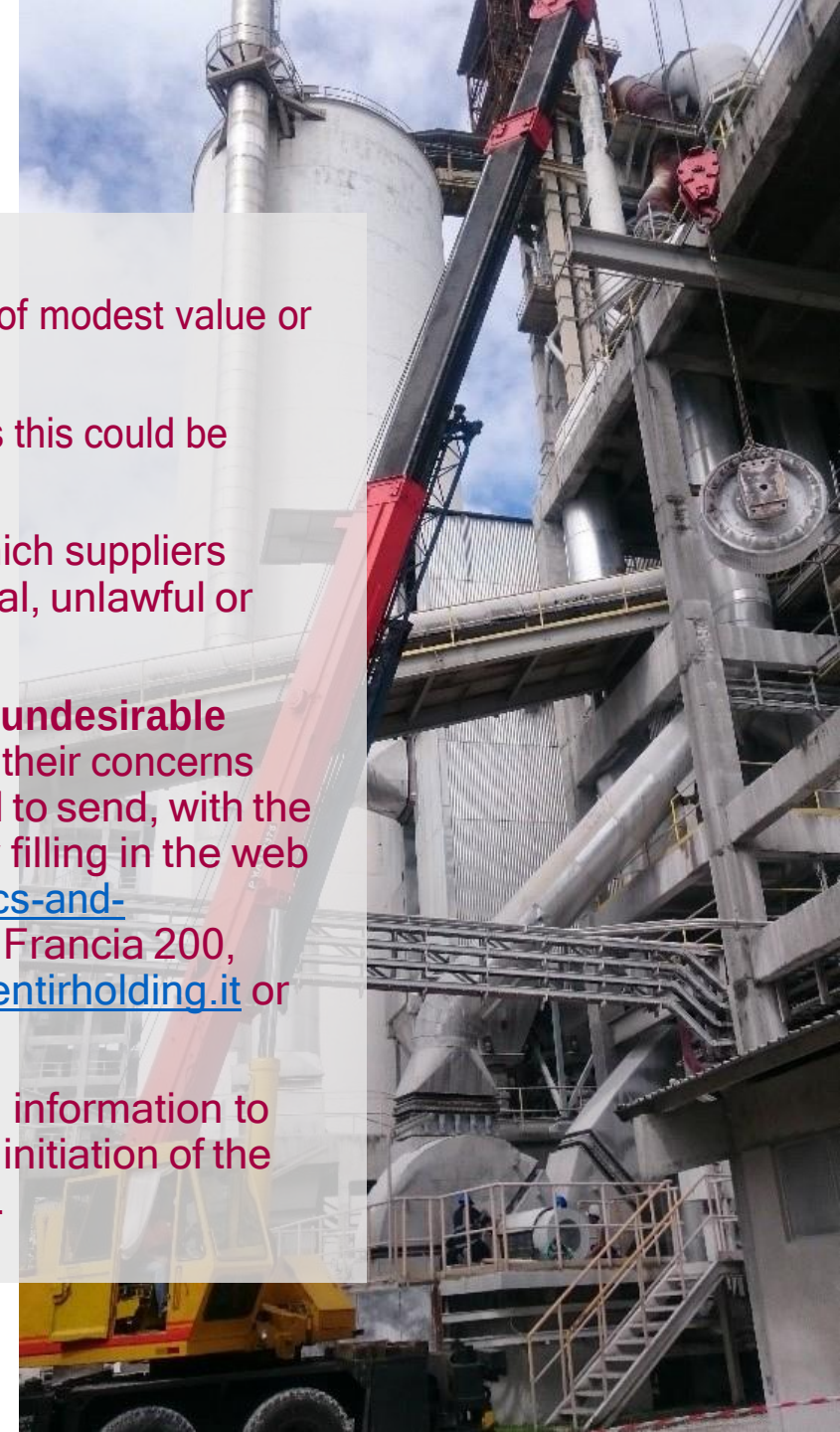
Therefore, **suppliers must refrain from offering gifts or other benefits**, except for those of modest value or in accordance with normal business practice, to Group employees.

Further, **suppliers may not make a job offer and/or hire Cementir Group employees**, as this could be understood as improper influence of our professional relationship.

We are also committed to creating and maintaining an open working environment in which suppliers and our employees are able to raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct.

We recognize that genuine commitment to **detecting and preventing illegal and other undesirable conduct** must include a mechanism whereby suppliers, like our employees, can report their concerns freely and without fear of reprisal or intimidation. Suppliers are therefore encouraged to send, with the maximum guarantee of confidentiality, reports of illegal or undesirable behaviour by filling in the web form in Cementir Group website (<https://www.cementirholding.com/en/governance/ethics-and-compliance>) or by sending ordinary mail (to: Cementir Holding, Internal Audit, Corso Francia 200, 00191 Rome, Italy) or by emailing to the dedicated accounts (whistleblowing@cementirholding.it or ethicscommittee@cementirholding.it).

The alleged violations should be detailed in order to provide sufficient corroborating information to identify the persons involved and the wrongdoings. The receipt, the analysis and the initiation of the verification will be conducted by the Chief Internal Audit Officer of Cementir Holding.



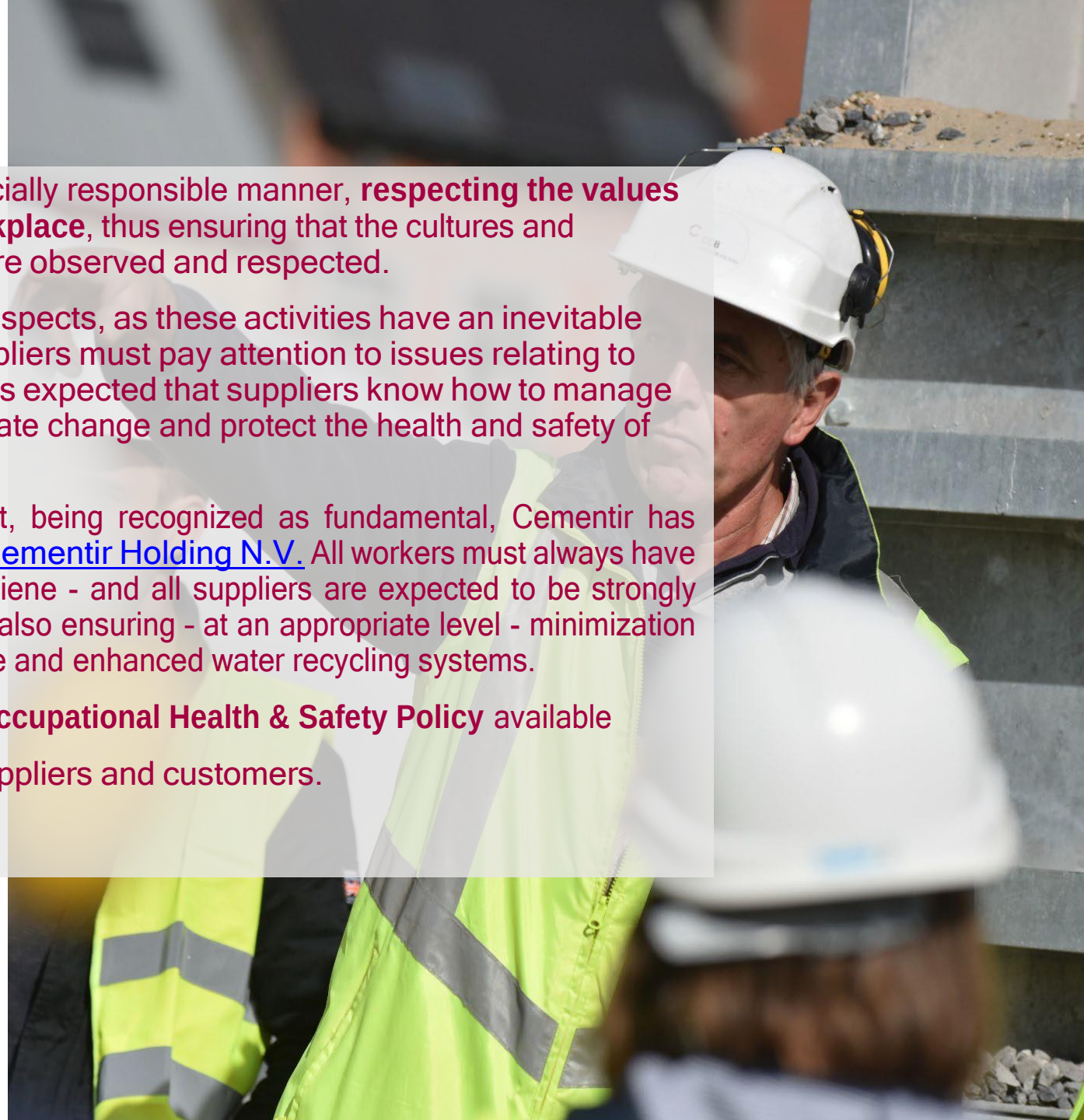
Protection of Health, Safety and Environment

Suppliers must be strongly committed to behave in a socially responsible manner, **respecting the values of a positive environment and a healthy and safe workplace**, thus ensuring that the cultures and traditions of each country in which suppliers operate are observed and respected.

The relationship with the territory is one of the crucial aspects, as these activities have an inevitable impact on the surrounding areas. For this reason, suppliers must pay attention to issues relating to climate change and emissions into the atmosphere. It is expected that suppliers know how to manage emissions, protect the business from the impacts of climate change and protect the health and safety of workers.

On the specific matter of sustainable water management, being recognized as fundamental, Cementir has adopted a Group Water Policy available at [Water policy | Cementir Holding N.V.](#) All workers must always have an adequate access to WASH - water, sanitation and hygiene - and all suppliers are expected to be strongly committed to adopt efficient water management practices, also ensuring - at an appropriate level - minimization of freshwater withdrawal, reduction of wastewater discharge and enhanced water recycling systems.

Cementir Group encourages the **adoption of the Group Occupational Health & Safety Policy** available at [Health and Safety | Cementir Holding N.V.](#) by its suppliers and customers.



Internal Control and Risk Management System

You must promote and maintain an **adequate internal control and risk management system** to be understood as the set of instruments that are necessary or useful to guide, manage and monitor business activities in order to ensure compliance with any laws and company procedures, to protect company assets, to manage efficiently and effectively the company processes and to provide accurate and complete accounting and financial data with a view to adding value for all stakeholders.

Monitor and Remedial action

We actively engage with our suppliers at a very early stage in our procurement activities to ensure this Supplier Code of Conduct is put into practice and is continuously tracked.

We reserve the right to conduct announced audits at suppliers' site to verify compliance with this Supplier Code of Conduct. Suppliers must provide access to relevant and reasonably requested information and documentation during the audit. The confidentiality of all audit activities is protected through written agreements, and all information and results will be handled confidentially.

In the event of non-conformity, we:

- reserve the right to early terminate the business relationship with any supplier that materially infringes the basic principles of the Supplier Code of Conduct
- will require that suppliers promptly implement action plans to bring their performance in line with the requirements and will provide technical support to suppliers to jointly define the required remedies
- reserve the right to conduct a follow-up audit to verify implementation of the prescribed remedial actions. If such remedial actions are not implemented, we reserve the right to early terminate the business relationship.

Please contact your contact person at our Procurement department for any general questions or comments on the Code.