HEIDELBERGCEMENT

Annex 4 - HeidelbergCement's Supplier Code of Conduct

In general, our business activities are subject to the respective national laws and regulations dealing with environmental protection, product safety and social welfare matters. Over and above, it is HeidelbergCement's policy to formally request that all our suppliers respect the principles of our Supplier Code of Conduct and adopt practices that are consistent with it.

Building from our HeidelbergCement "Code of Business Conduct", our Supplier Code of Conduct seeks compliance with international social accountability standard SA 8000 and environmental standard ISO 14001 and the principles of the International Labor Organization in our upstream supply chain.

This globally applicable Supplier Code of Conduct acts a basis for all contractual relationships. HeidelbergCement values close and productive cooperation with its suppliers. That said, if all efforts to remedy material shortcomings against the Supplier Code of Conduct fail, either through unwillingness of the supplier or that the plan of action cannot be implemented within the agreed timeframe, a termination of the contractual relationship will ultimately result.

The Supplier Code of Conduct

HeidelbergCement's Supplier Code of Conduct expects from HC Supplier Base the following:

Working Conditions / Labour

- 1. Suppliers must not use child labour in any stage of manufacturing. Suppliers are requested to follow the ILO conventions recommendation of minimum age for admission to employment
- 2. Compensation and benefits ought to comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits.
- 3. Any form of forced or compulsory labour must not be used, and employees shall be free to leave employment after reasonable notice.
- 4. Suppliers are expected to adhere to the right of employees to freedom of association and recognition of employees' rights to collective bargaining, where allowable by law.
- 5. Workers should have safe and healthy working conditions that meets or exceeds applicable standards for occupational safety and health.

Environmental Standards

- 1. Supplier operations will be carried out with care for the environment and will include compliance with all relevant legislation in the country concerned.
- 2. All products and services will be delivered to meet the environmental, quality and safety criteria specified in relevant contract elements, and will be safe for their intended use.

Business Ethics

- Business will be conducted with integrity. There will be no payments, services, gifts, entertainment or other advantages offered or given to any HeidelbergCement employee or third party which are intended to influence the way in which the HeidelbergCement employee or third party goes about his or her duties. Similarly HeidelbergCement will not offer or give such payments, services, gifts, entertainment or other advantages to any supplier which are intended to influence the way in which the supplier goes about his or her duties.
- 2. There will be respect for human rights, harassment or discrimination against employees in any form is not acceptable. This includes but is not limited to gender, ethnic origin, skin colour, religion, sexual orientation, disability or age.

Concluding Comments

- 1. It is expected that HeidelbergCement's direct suppliers will take responsibility to require adherence to the principals of this Supplier Code of Conduct from their direct suppliers and exercise diligence in verifying that these principles are being adhered to in their supply chains.
- 2. Safeguarding of these standards is a long-term learning and development process. We will work together with our suppliers towards compliance and will continually review and revise these principles if needed.

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