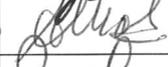


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<b>GROUP HUMAN RIGHTS POLICY</b>		

## HUMAN RIGHTS

REVISION	DESCRIPTION AND REASON FOR REVISION
1	FIRST ISSUE
2	
3	
4	
5	

	NAME	FUNCTION	DATE	SIGNATURE
Review by:	C. Criscuolo	General Counsel	09/2/20	
Review by:	F. Doria	Chief Internal Audit Officer	18/2/20	
Review by:	A. Maniscalco	Chief Human Resources Officer	13/2/20	
Review by:	P. Zugaro	Chief Operating Officer	11/2/20	
Approved by:	F. Caltagirone	Chairman & Chief Executive Officer	22.2.20	

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## 1 OBJECTIVE AND SCOPE

### 1.1 OBJECTIVE

The objective of this Policy is to formalize the principles for our actions, processes and behaviors in relation to human rights.

This Policy applies immediately from the moment of its issuance to all our Companies in the Group and does not require any local enactment, even if prescribed at Business Unit Level (B.U.) and prevails over any existing or future Company Procedure.

This Policy applies to Cementir Holding N.V. (the “Corporate”) and to the Companies, included in Cementir Group reporting package, over which the Corporate exercises direct or indirect control<sup>1</sup>.

This Policy is communicated internally to all employees, without distinction of level, in the most appropriate way and in accordance with the local rules and practices and externally through our website and to our Customers and suppliers/Sub-Contractors.

Each Business Unit is internally and externally responsible for the effective application of the contents of this Policy by adopting the principles here formalized and applicable starting from the issuance of this Policy.

In cases where the application of this Policy is doubtful, the Head of Region<sup>2</sup> shall request to the Corporate Human Resources department whether to follow it or not.

All the Group employees and suppliers are required to acknowledge and act in compliance with this Policy during their entire employment relationship and partnership respectively.

### 1.2 SCOPE

This Policy sets out Cementir’s commitment and responsibilities in relation to all the Human Rights.

We would like to continuous delivery value to all of our stakeholders through our core values of uncompromising integrity, by being close to our customers while focusing on attention to detail and innovative approaches and close to our suppliers while focusing on long term partnerships.

Respect for human rights is a basic tenet of Cementir’s beliefs and is consistent with our values and our goals to be a more economically, socially and environmentally sustainable Group. Our Human Rights Policy is aimed at supporting and guiding our management and employees to achieve our goals.

At Cementir, we understand the increasing importance of the role of being an international Group providing product and services in a global society. To ensure that we meet the responsibilities of this role, it is necessary to foster and maintain a responsible and safe work environment for our

<sup>1</sup> In accordance with the definition of the International Financial Reporting Standards (IFRS).

<sup>2</sup> Before the “regional evolution” is completed, the Head of Region takes advantage of the relevant B.U. structures in order to perform this activity and to carry out all the other operating activities defined in this present Policy.

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employees. As a result, Cementir has developed this Human Rights Policy with regard to the basic human rights that we aim to respect and safeguard.

Cementir endorses 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.

Cementir supports these human rights and employees' rights in line with the legitimate role of business.

## 2 REFERENCES

### 2.1 EXTERNAL REFERENCES

This Policy supports the following treaties of International and European Law and applies the founding principles:

1. The United Nations International Charter of Human Rights (UN):
  - a. Universal Declaration of Human Rights;
  - b. International Convention on Civil and Political Rights;
  - c. International Convention on Economic, Social and Cultural Rights;
2. The fundamental conventions of the International Labor Organization (ILO) - n. 29, 87, 98, 100, 105, 111, 138, 182 - and the declaration on Fundamental Principles and Rights at Work;
3. The UN Convention on the Rights of Children;
4. ILO Conventions n.107 and n.169 on the Rights of Indigenous and Tribal Populations;
5. The European Convention on Human Rights.

In addition, have been considered the following private sector standards and voluntary initiatives in their most updated editions:

1. The 10 principles of the UN Global Compact;
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Companies;
3. The Tripartite Declaration of Principles on Multinational Enterprises and ILO Social Policy;
4. Guiding Principles on Business and Human Rights: implement the UN framework "protect, respect and remedy".

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## 2.2 INTERNAL REFERENCES

- Cementir Corporate N.V. “Organizational and Management Model” pursuant to Italian Legislative Decree 231/01
- Code of Ethics
- Risk Management Policy (CH\_GPO\_11)
- Code of Conduct
- Group Diversity Policy

## 3 ACRONYMS

CEO	Chief Executive Officer
COO	Chief Operating Officer
CPF	Chief of Professional Family
Group	Corporate and Business Units (BU)
Corporate	Cementir Holding N.V.
MD	Managing Director
BU	Business Unit
CMT	Corporate Management Team
GMT	Group Management Team

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## 4 COMMITMENT TO OUR STAKEHOLDERS

### 4.1 OUR EMPLOYEES

At Cementir, we are committed to respect the human rights of our employees. We develop our worldwide employment policies & procedures with the aim of compliance with the relevant aspects of international human rights declarations. We are committed to train our employees to be aware of, respect and protect human rights in the workplace and in the local communities directly impacted by our operations.

#### **Promoting Health and Safety:**

We are committed to the health, safety and well-being of our employees. Cementir is committed to work towards a long-term vision of zero accidents.

#### **Promoting Freedom of Association and the Right to Collective Bargaining:**

Cementir respects the freedom of association and our employees' right to collectively bargaining. We work with our subcontractors and suppliers to ensure they do the same. Cementir recognizes the value of collective bargaining as a favored instrument for determining the contractual conditions of its employees as well as regulating relations between management and unions.

#### **Prohibiting Child, Forced or Compulsory Labor:**

Cementir opposes the use of forced or compulsory labor – as defined by ILO Convention n.29 – and does not confiscate money or identity papers upon commencing employment relationships in order to retain workers against their will. We will adhere to all regulations and laws against forced or compulsory labor. We also work with our subcontractors and suppliers to ensure they do the same.

#### **Prohibiting Unlawful Discrimination in the Workplace:**

Cementir is committed to ensuring that each employee is treated with fairness, respect to diversity and dignity. In accordance with Cementir's Code of Ethics, Code of Conduct and Diversity Policy, we will facilitate employee reporting within Cementir about what the employee reasonably believes constitutes a violation of any laws or our Policy. Any alleged human rights violations can be reported through the whistleblowing system as other types of potential violations (see <https://www.cementirholding.com/en/governance/ethics-and-compliance>)

Any unlawful discriminatory practice based on race, ethnicity, color, creed, religion, gender, age, national origin, marital status, sexual orientation, gender identity or expression, disability, veteran status or other characteristics protected by applicable federal, state or local law will not be tolerated. Cementir seeks to provide each employee with equal opportunity for advancement and development without discrimination.

#### **Prohibiting Harassment and Violence:**

Cementir is committed to promote a work environment free of any form of harassment, any physical, verbal, sexual or psychological abuse, threats or intimidation in the workplace, exploitation, abuse or violence as defined by the laws of each country in which we operate.

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### **Providing Competitive Compensation and Remuneration:**

Cementir seeks to pay competitive wages based on local market assessment and, at a minimum, in accordance with local laws and regulations. The remuneration takes into account the principle of fair reward for labour and respects the principle of equal remuneration for male and female employees for work of equal value, based on the objective appraisal of jobs on the basis of the work to be performed (ILO Convention no. 100). The minimum compensation received by Group employees cannot be lower than the minimum set in the collective labour contracts and law regulations in force in each country in accordance with the provisions of the ILO Conventions.

### **Upholding Conditions of Employment:**

Cementir complies with all laws regarding conditions of employment including basic and overtime working hours and will abide by agreements negotiated with our employee representatives and trade unions.

Cementir also recognizes the importance of professional support and training for the development of its people and their skills and competencies, by enhancing their involvement and participation.

### **Ensuring Legal Compliance:**

At a minimum, Cementir will comply with existing local, state and national laws regarding human rights and workers' rights in the locations where the Group does business.

Applicants will be treated taking in consideration the same principles.

## **4.2 OUR CUSTOMERS, SUPPLIERS AND SUB-CONTRACTORS**

Beyond our own operations, Cementir seeks to avoid even indirect involvement in human rights abuses. We are working on identifying where in the value chain of our products adverse human rights impacts from human trafficking may occur.

We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring and contractual provisions.

We ask our Suppliers and Sub-Contractors to comply with the principles of this Policy in their work environment.

### **Upholding Human Rights in the Value Chain:**

All business partners are responsible for supporting human rights in the work environment. It is every partner's responsibility to meet Cementir's standards and ethical expectations, which includes striving for internationally accepted labor standards and a zero-tolerance policy towards the application of child labor.

### **Communicating to Supplier:**

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Cementir' Suppliers and Sub-Contractors should comply with the principle of this Policy in their work environment to which Cementir expects its suppliers to adhere. The principles are provided to suppliers by negotiating agreements with Cementir, its subsidiaries and affiliates worldwide. These principles are an important way in which Cementir communicates its environmental and social concerns to its suppliers.

#### **Preventing Slavery and Human Trafficking:**

Cementir negotiates agreements with its direct suppliers in which the suppliers certify that the supplier complies with all applicable laws and regulations, including those relating to the prohibition of forced labor and human trafficking.

### **4.3 LOCAL COMMUNITIES**

We seek to respect human rights and to develop an awareness and understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations. Cementir is committed to respecting the rights of local communities and to contribute to their realization, also by means of promoting free and informed consultation activities.

**Avoiding Involuntary Resettlements:** Cementir seeks to avoid involuntary resettlements. In situations where it is unavoidable, we commit to comply with the national government's or regional authorities' guidelines on resettlement and rehabilitation and also act in line with international human rights norms on this subject.

#### **Respecting Indigenous Peoples' Rights:**

Cementir respects the rights of Indigenous peoples as defined by applicable national and emerging international standards.

#### **Adopting Proportionate Security Arrangements:**

Cementir strives to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines. We will adapt our security arrangements to balance the need for safety while respecting human rights.

#### **Developing Practices for Land and Water Use:**

Cementir works toward understanding and applying sound practices for land and water use consistent with emerging international practices while respecting human rights.

#### **Non-complicity in Human Rights Violations:**

Cementir recognizes that in countries that are politically less stable or where human rights are compromised dilemmas may arise, including whether or how it can continue to operate in that

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country with integrity. Cementir will act in such a way that none of its operations knowingly contribute to human rights violations and breaches caused by others.

#### **Privacy and communications:**

Cementir respects the confidentiality and right to privacy of its stakeholders and is committed to the correct use of the information and data that are supplied to it. Cementir is also committed to ensuring institutional and commercial communications that are nondiscriminatory and respectful of different cultures, and also pays particular attention to not adversely affect the most vulnerable audiences, such as children.

## **5 TRAINING**

Managers and employees will receive relevant training on how to implement this policy in the scope of their employment.

Proper communication will be performed to reach as much as possible our employees (using internal communication channels) and to our Customers and Suppliers while negotiating new contracts.

## **6 IMPLEMENTATION AND MONITORING**

Any alleged human rights violations can be reported through the whistleblowing system as other types of potential violations.

Alleged violations can be reported through the channels described in the ethics and compliance section of Cementir website.

<https://www.cementirholding.com/en/governance/ethics-and-compliance>

## **7 POLICY REVIEW**

Cementir will review periodically the Human Rights Policy and monitor locally our implementation with respect to its suitability and effectiveness.

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## 8 DEFINITIONS

<p>Forced and compulsory labor</p>	<p>All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. (Art. 1.1 of ILO Convention no. 111)</p>
<p>Business relationships</p>	<p>Relationships with business partners and enterprises in the value chain, as well as any other government or non-government entity, directly linked to the operations, products or services of the enterprise. (Principle 13 “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework)</p>
<p>Discrimination</p>	<p>The term discrimination includes both direct and indirect discrimination, respectively: a) any distinction, exclusion or preference based on race, color, sex, age, sex orientation, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; b) any distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. (Art. 1.1 of ILO Convention no. 111)</p>