

Company Name HeidelbergCement
Industry Extractives
Overall Score (*) 15.8 out of 100

Theme Score	Out of	For Theme
2.4	10	A. Governance and Policies
2.4	25	B. Embedding Respect and Human Rights Due Diligence
1.3	15	C. Remedies and Grievance Mechanisms
3.1	20	D. Performance: Company Human Rights Practices
3.2	20	E. Performance: Responses to Serious Allegations
3.4	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: In its Human Rights Position, the Company states its commitment to human rights as it follows: "HeidelbergCement Group commits to its responsibility to respect human rights. In all countries in which we are active, we comply with the applicable laws and regulations as the legal basis of our business activity. As a globally active company, we are moreover committed to global values and standards. We are committed to the principles of the following internationally recognized standards: The Universal Declaration of Human Rights, The eight core labour standards of the International Labour Organization (ILO), The OECD Guidelines for Multinational Enterprises, The United Nations Guiding Principles for Business and Human Rights ("Protect, Respect and Remedy"-Framework)" [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Score 2 <ul style="list-style-type: none"> Met: UNGPs: In its Human Rights Position, the Company states its commitment to the United Nations Guiding Principles for Business and Human Rights ("Protect, Respect and Remedy"-Framework) [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com]
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: ILO Core: The Company states that it is committed to the eight core labour standards of the International Labour Organization (ILO). [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Explicitly list All four ILO apply to EX BPs: In the Supplier Code, which 'acts as basis for all contractual relationships', the Company explicitly lists all four ILO standards. Child labor, Forced labor and Discrimination are not allowed and with respect Freedom of association and Collective bargaining the Supplier Code indicates: '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'. However, CHRB could not find alternative measures to support freedom of association and collective bargaining where they are restricted by law. [Supplier Code of Conduct, May 2019: lehighhanson.com & Sustainability Report 2018, 2018: heidelbergcement.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: According to the human rights position paper, the Company states that Compliance with the ILO core labour standards is compulsory, what includes prevention of child and forced labour, compliance with the principle of non-discrimination in the workplace, the right of freedom of association as well as collective bargaining. In addition, the document indicates: 'This will also apply to the extent that applicable law does not prohibit application of the ILO core labour standards. Should this be the case, we will make every effort to observe the underlying principles reliably and adequately.' [Human Rights Position of theHeidelbergCement Group, 7 December 2017: heidelbergcement.com] • Met: Respect H&S of workers: In the Sustainability Report, the Company reports that Occupational health and safety has top priority at HeidelbergCement and is an integral part of its key corporate values. They state that "That is why we continuously strive to minimize the risks for our employees, contractors, and third parties and to achieve our goal of "zero harm", which we reiterated in our Sustainability Commitments 2030" [Sustainability Report 2017, 2017: heidelbergcement.com] • Met: H&S applies to EX BPs: In the Supplier Code, the Company states that workers should have safe and healthy working conditions that meets or exceeds applicable standards for occupational safety and health. Moreover, in the Sustainability Report, the Company states that " In the Sustainability Report, the Company reports that Occupational health and safety has top priority at HeidelbergCement and is an integral part of its key corporate values. They state that "That is why we continuously strive to minimize the risks for our employees, contractors, and third parties and to achieve our goal of "zero harm", which we reiterated in our Sustainability Commitments 2030". In addition, the supplier code states that: "This globally applicable supplier code of conduct acts as basis for all contractual relationships". [Supplier Code of Conduct, May 2019: lehighhanson.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Based on UN Instruments • Not met: Voluntary Principles (VPs) participant • Not met: Uses only ICoCA members • Met: Respecting indigenous rights: In its human rights policy, the Company states that " We respect the rights of indigenous communities as far as they are affected by our business activity." [Human Rights Position of theHeidelbergCement Group, 7 December 2017: heidelbergcement.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: ILO 169 • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) • Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: According to its Sustainability Report, the Company states that "In view of the strong local focus of our business operations, we can only be successful in the long term if we maintain good cooperative relationships with the various stakeholders in society. We seek to establish and maintain a dialogue based on trust with all relevant stakeholder groups – at a local, national, and international level". Moreover, the Company indicates in the Annual Report that "HeidelbergCement's position on human rights,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>which came into force on 1 January 2018, is a commitment by the Group to respect human rights. It addresses employees' working conditions, responsibility at our locations (including the rights of indigenous communities), the selection of suppliers and customers, and the implementation and progress monitoring of human rights targets." [Sustainability Report 2018, 2018: heidelbergcement.com & 2018 Annual Report, 21 March 2019: heidelbergcement.com]</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts: According to the annual report, the Company states that "Our suppliers must subscribe to fundamental human rights. A supplier management system is currently being introduced across the Group to improve monitoring in this area. In the future, compliance training will cover the topic of human rights more extensively." As it stated, the Company is still taking its first steps in this issue. [2018 Annual Report, 21 March 2019: heidelbergcement.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: According to the Leadership principles, the board is committed and approves the commitment to Human Rights. [Leadership Principles, June, 2014: heidelbergcement.com] • Not met: Board level responsibility for HRs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: According to the Sustainability Report, the Company states that 'Following the introduction of a Group position on human rights, we have started to systematically assess human rights risks and compile performance indicators relating to human rights in each country'. However, the Company does not indicate that at least one board member has an incentive or performance management scheme linked to an aspect of the company's human rights policy. [Sustainability Report 2018, 2018: heidelbergcement.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: At least one key EX RH risk, beyond employee H&S • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: Senior responsibility for HR Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key EX HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR risks is integrated as part of enterprise risk system: According to its annual report, the Company states that " In 2017, we launched a risk analysis for human rights. Among other issues, this explicitly examines the risk of violating the rights of indigenous peoples. A pilot project to identify potential risks and existing measures, and to determine additional measures to be implemented, was successfully completed. The aim is to regularly repeat the analysis after a period of around three years." However, it is not clear whether these are integrated in the Company's general risk management system. [2018 Annual Report, 21 March 2019: heidelbergcement.com] Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: Communicates its policy to all workers in own operations Score 2 <ul style="list-style-type: none"> Met: Commits to all 4 ILO core conventions: See indicator A.1.2 [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: Communication of policy commitments to stakeholder: According to the Human Rights Position Paper, the Company explains that "Communication at the locations is supported by the Communication Department of our respective national company. We use the full range of information and dialogue media, from guidelines and information letters to regular meetings with our stakeholders. Each location assigns an employee to receive any local complaints. These are checked internally." However, the policy needs to be communicated in the context of the system, what is not mentioned. [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to all 4 ILO core conventions for suppliers [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: Communicating policy to EX contractors and joint ventures: According to Human Rights Position Paper, the Company states that "We do not only select our suppliers according to business criteria alone. Environmental protection, occupational health and safety and social standards as well as compliance are also part of the evaluation of new and existing supply relationships and are embedded in the Supplier Code of Conduct of HeidelbergCement. This worldwide applicable Supplier Code of Conduct is the basis of the contractual relations." However, it is not clear that it also includes extractive business partners. [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: Including to EX BPs (removed)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: How HR commitments made binding/contractual: The Company states that "We do not only select our suppliers according to business criteria alone. Environmental protection, occupational health and safety and social standards as well as compliance are also part of the evaluation of new and existing supply relationships and are embedded in the Supplier Code of Conduct of HeidelbergCement. This worldwide applicable Supplier Code of Conduct is the basis of the contractual relations." [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: Including on EX BPs
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Scores at least 1 on A.1.2 Not met: Trains all workers on HR policy commitments: In the annual report, the Company states that " We train our employees in a wide range of occupational safety topics that are both legally mandated and defined internally." However, they do not explicitly indicate if it trains its workers on human rights policy commitments. [2018 Annual Report, 21 March 2019: heidelbergcement.com] Not met: Trains relevant EX managers including security personnel: In the Sustainability Report, the Company states that " In 2017, we therefore once again underlined the importance of the exemplary role of line managers in occupational health and safety with a Group-wide training initiative. " However, the company does not describe how relevant managers and workers receive specific human rights training relevant to their role. [Sustainability Report 2018, 2018: heidelbergcement.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Score of 2 on A.1.2 Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Scores at least 1 on A.1.2 Met: Monitoring implementation of HR policy commitments: According to the Human Rights Policy, the Company states that " In order to assess if we comply with the internationally recognized work and social standards within the HeidelbergCement Group, we set up a three-part monitoring system. This includes: An intensive dialogue with the employee representatives; A compliance hotline where all employees may report deficiencies related to violation of work and social standards anonymously and confidentially; Regular reporting in the form of a general Group Compliance Report and Compliance Incident Report, in order to check/ensure compliance with our own duties in everyday business. The results will be presented to the Audit Committee of the Supervisory Board. Regular audits at our sites ensure uniformly high standards in all areas of environmental protection, health and safety protection within the HeidelbergCement Group." [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com] Not met: Monitoring EX BP's: The Company states that 'A supplier management system, which is currently being set-up, will be introduced across the Group to improve monitoring in this area. In the future, compliance training will cover the topic of human rights more extensively'. However, the process is still in its first steps. [2018 Annual Report, 21 March 2019: heidelbergcement.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Score of 2 on A.1.2 Not met: Describes corrective action process: The Company states that "We examine every report we receive and take appropriate disciplinary action in cases of proven misconduct. These measures can range from reprimands to dismissal. We also initiate civil action and press criminal charges, if necessary. In addition to taking corrective action, we implement preventive measures to help prevent similar incidents arising in the future." However; it does not describe the corrective action process; [Sustainability Report 2018, 2018: heidelbergcement.com] Not met: Example of corrective action Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: HR affects selection EXs business partners Met: HR affects on-going EX business partner relationships: The Company states that "We inform our suppliers about the expected standards and sensitize them for sustainability topics. In the case of increased risk potential or where suppliers do

Indicator Code	Indicator name	Score (out of 2)	Explanation
			not or only partially meet our standards as well as in the selection of new suppliers, we visit them on site and agree on necessary correction measures where applicable." Moreover, the Company states that "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." [Human Rights Position of the HeidelbergCement Group, 7 December 2017: heidelbergcement.com & Supplier Code of Conduct, May 2019: lehighhanson.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with EX business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Stakeholder process or systems: In the Sustainability Report, the Company states that "We aim to reconcile the interests of the company with those of the local community. The concerns of our local stakeholders vary from location to location". The Company states that "We involve local communities in our business activities, for example through various dialogue formats, as well as through local community engagement plans and councils. This also includes long-term partnerships with local non-governmental organizations. Moreover, we keep the communities at our locations informed via newsletters or at open days. The Group Handbook for Community Relationship Management is a useful source of design and implementation strategies for dialogue formats, partnerships, and charitable commitments." [Sustainability Report 2018, 2018: heidelbergcement.com] • Not met: Frequency and triggers for engagement • Not met: Engagement includes EX business partners workers • Not met: Engagement includes EX business partners communities Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Identifying risks in own operations: In the annual report, the Company states that "In 2017, we launched a risk analysis for human rights. Among other issues, this explicitly examines the risk of violating the rights of indigenous peoples. A pilot project to identify potential risks and existing measures, and to determine additional measures to be implemented, was successfully completed. The aim is to regularly repeat the analysis after a period of around three years." Moreover, the Company states that " A comparable system to assess human rights risks is currently being introduced across the Group. To ensure that we comply with the relevant sanctions regulations in the countries in which we are active, in particular those of the European Union and the USA, we carry out regular systematic verification procedures against international sanctions lists. As part of the process of adapting to the EU General Data Protection Regulation, measures are being implemented to ensure, in particular, that we comply with organizational specifications as well as documentation and risk impact assessment requirements." [2018 Annual Report, 21 March 2019: heidelbergcement.com] • Not met: identifying risks in EX business partners [2018 Annual Report, 21 March 2019: heidelbergcement.com] Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: According to Human Rights Position Paper the Company indicates to have a three part monitoring system. One of them is a "A compliance hotline where all employees may report deficiencies related to violation of work and social standards anonymously and confidentially." [Human Rights Position of theHeidelbergCement Group, 7 December 2017: heidelbergcement.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Not met: Expect EX BPs to have equivalent grievance system • Met: Opens own system to EX BPs workers: According to the Supplier Code, "suppliers may submit any concerns regarding non-compliant behavior, either to applicable laws or to internal HC regulations, via our compliance hotline "MySafeWorkplace" (mysafeworkplace.com)." [Supplier Code of Conduct, May 2019: lehighhanson.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Response timescales Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Public statement prohibiting retaliation Not met: Practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> Not met: Has not retaliated in practice Not met: Expects EX BPs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Living wage target timeframe or achieved Not met: Describes how living wage determined: The company only states that "Expenditure on wages and salaries, social security costs, costs of retirement benefits, and other personnel costs rose by 11.8% in comparison with the previous year to €2,990 million (previous year:2,674). This corresponds to a share in revenue of 17.3% (previous year: 17.6)". This information is not enough for the indicator. [2018 Annual Report, 21 March 2019: heidelbergcement.com] Score 2 <ul style="list-style-type: none"> Not met: Pays living wages Not met: Reviews living wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Member of EITI Not met: Reports of taxes and revenues beyond legal minimums Score 2 <ul style="list-style-type: none"> Not met: Reports taxes and revenue by country Not met: Steps taken re non EITI countries Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: In its annual report, the Company discloses the accident frequency rate, accident several rate and fatality rate. [2018 Annual Report, 21 March 2019: heidelbergcement.com] • Not met: Lost days or near miss disclosures • Met: Fatalities disclosures: In its annual report, the Company discloses the accident frequency rate, accident several rate and fatality rate. [2018 Annual Report, 21 March 2019: heidelbergcement.com] Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: According to the annual report, the Company states that "As part of our Group policy on occupational health and safety, we have defined a set of "cardinal rules" that are mandatory for all employees and contractors. They relate in particular to those activities that have been identified as main risk areas for accidents. They are therefore also addressed in specific Group standards and must be translated into local regulations." Moreover, the Company states that " Occupational health and safety is one of the core values of our Group. We believe that injuries, occupational illnesses, and work-related health impairments are avoidable. That's why we continuously strive to minimize the risks for our employees, contractors, and third parties and to achieve our goal of "zero harm", which we recently reiterated in our Sustainability Commitments 2030." [2018 Annual Report, 21 March 2019: heidelbergcement.com] • Not met: Met targets or explains why not
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment Score 2 <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach Score 2 <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Action to prevent water and sanitation risks: Following a water-risk study, it was determined that 14.3% of the Company's plants were in water scarce regions. The Company states that 'we began developing individual water management plans for those plants in regions suffering from water scarcity. The plans include concepts and measures to ensure careful use of scarce water resources and enable local stakeholders to become involved so that the water utilisation concepts support the common good and thus minimise local water risks'. [Sustainability Report 2018, 2018: heidelbergcement.com] Score 2 <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 12.64 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.16 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.37 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, HeidelbergCement made data public that met one or more elements of the methodology in 13 cases, leading to a disclosure score of 1.37 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: According to its own website, the Company reports on GRI. [GRI Content Index, 2018: heidelbergcement.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	HeidelbergCement met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.