

Statement of the Executive board of HeidelbergCement with regard to counter-motions submitted by Dachverband der kritischen Aktionärinnen und Aktionäre and Wespah at the AGM on 06th May 2021

I now come to the counter-motion of the Dachverband der kritischen Aktionärinnen und Aktionäre on agenda item 3, discharge of the Executive Board. We strongly oppose the accusation that the Executive Board is not fulfilling its human rights due diligence. The Executive Board is regularly informed about the current situation within the framework of compliance and risk management. Both the Executive Board and the Supervisory Board regularly discuss human rights aspects and corresponding measures. The statement that it is not apparent how we comply with the requirements of the UN Guiding Principles on Business and Human Rights is inaccurate. In recent years, comprehensive management processes have been put in place to effectively fulfil the human rights due diligence obligation. These comply with both the requirements of the UN Guiding Principles on Business and Human Rights and the requirements of the German government's National Action Plan on Business and Human Rights. In addition to the reference to human rights in our codes of conduct for employees and suppliers, the measures taken include, for example, the adoption of a group-wide human rights position, the inclusion of human rights aspects in our investment criteria, the provision of a group-wide and publicly accessible compliance hotline, the implementation of systematic human rights risk analyses, and the establishment of a supplier management system. Human rights and sustainability aspects are part of our investment criteria and are also regularly discussed within the framework of compliance and risk management reporting by the Executive Board and the Supervisory Board. Already during the planning of investment projects, in addition to comprehensive social and environmental impact assessments, a broad engagement of all stakeholders takes place, which takes into account the special concerns of indigenous groups, as well as the concerns of other local residents. The principles of free, prior and informed consent are taken into account in all projects.

I now come to Wespah's counter-motion on agenda item 3, discharge of the Executive Board. HeidelbergCement firmly rejects the accusation of non-transparent and insufficient reporting on its management processes for the fulfilment of human rights due diligence. The implemented management processes and the associated reporting comply with the requirements of the National Action Plan on Human Rights and the EU Directive 2014/95/EU on the disclosure of non-financial and diversity information by certain large undertakings and groups. We have already started to adapt to expected and extended disclosure requirements. In this context, we will continue to enhance our reporting and will be happy to contact you on how we can better address your concerns in this regard. Nevertheless, we would like to state that we observe and respect the applicable laws and regulations in all countries in which we operate. As a globally active company, we are also committed to global values and standards and have set out this commitment in a group-wide human rights position. They also form the basis of our risk management processes. Mechanisms to monitor human rights compliance include the adoption of a group-wide human rights position, publicly accessible compliance hotlines to report violations and misconduct, conducting human rights risk analyses and developing action plans, introducing a group-wide supplier management system, expanding investment criteria to include human rights aspects. Human rights and sustainability aspects are part of our investment criteria and are also regularly discussed within the framework of compliance and risk reporting within the Executive Board and the Supervisory Board. Already during the planning of investment projects, in addition to comprehensive social and environmental impact assessments, a broad stakeholder engagement is carried out that takes into account the special concerns of indigenous groups as well as the concerns of other local residents. This is also the case with the activities you mentioned.

In Western Sahara, as has already been publicly communicated, only grinding plants are operated. Most of the raw materials needed for this are imported from Morocco and otherwise purchased from local Saharawi companies. We therefore do not exploit any raw materials in Western Sahara. About two thirds of the products are sold in El Aaiún and the surrounding area, the rest is exported to Morocco, so there is no conflict with norms of international humanitarian law.