

# HEIDELBERG MATERIALS AG ANNUAL GENERAL MEETING ON 13 MAY 2026

## Questions from WSRW to the Executive Board of Heidelberg Materials AG and Answers (in italics)

[Unofficial translation by WSRW]

1. How much cement or concrete did Heidelberg Materials or its subsidiaries produce in 2024 and 2025, respectively, at the plants located in Western Sahara, and how is this volume distributed among the respective plants? Who exactly were the customers? What proportion was exported, and what proportion was used locally?

*In 2024, approximately 500,000 tons of cement and approximately 56,000 cubic meters of concrete were produced. In 2025, just under 600,000 tons of cement and approximately 40,000 cubic meters of concrete were produced. No products from Ciments du Maroc or its subsidiaries are exported from Western Sahara.*

2. What quantities of concrete or cement were sold in 2024 and 2025, respectively, to customers involved in the construction of the port in El Aaiún?

*In 2024, approximately 50,000 cubic meters of concrete were sold, and in 2025, approximately 20,000 cubic meters. No cement was sold in either year.*

3. What quantities of cement or concrete were sold in 2024 and 2025, respectively, to customers involved in the construction of the “Dakhla Atlantique” port in Dakhla?

*In both 2024 and 2025, approximately 50,000 tons of cement and no concrete were sold.*

4. According to data from Heidelberg Materials for the years 2023 and 2024, Ciments du Maroc purchases approximately 150,000 tons of limestone and pozzolans annually, which are mined by third-party companies owned by Sahrawis in Western Sahara. Exactly which local suppliers do you cooperate with, and what quantities were sourced from them in 2024 and 2025, respectively?

*You asked about the supply of limestone and pozzolan in Western Sahara and the quantities we purchase. The quantities purchased in both years range between 130,000 and 155,000 tons.*

5. According to information from Heidelberg Materials from 2025, there is regular communication within the group as well as between the plants in Morocco and Western Sahara.

How many trips were made to Western Sahara by how many HM employees to assist with maintenance work in 2024 and 2025? Is there any exchange or support beyond assistance with maintenance work?

*Exchanges within the group take place regularly worldwide on various topics; these are also conducted online. In both years, maintenance work in Western Sahara was carried out by local teams.*

6. Are there plans for further projects involving Heidelberg Materials or further expansion in the occupied Western Sahara? If so, what are they, and who are the contractual partners?

*In all countries where we operate, our normal business activities include participation in various projects through cement or concrete deliveries. This also applies to Western Sahara. As part of its long-term strategy, Ciments du Maroc regularly reviews development and investment opportunities. All new projects or expansions are subject to prior review, approval procedures, and, where required, disclosure in accordance with applicable regulations. At this time, there is no information available regarding specific planned infrastructure projects. We currently have no concrete plans to expand our activities in Western Sahara.*

7. What specific measures have been taken to ensure that the benefits the company derives from its business activities benefit the Sahrawi people of Western Sahara and not Morocco's settler economy?

*You asked what concrete measures we are taking to ensure that the benefits of our business activities in Western Sahara actually benefit the Sahrawi population. Our local companies, Betrou Saha and Indu Saha (Sahab?), are 49% and 9% owned, respectively, by Sahrawi investors. We employ Sahrawi staff and work with local suppliers. In this way, profits, wages, and procurement expenditures flow directly into the local community. In addition, we support local initiatives such as the renovation of schools, the distribution of school supplies and food, the promotion of local associations, and the operation of a wind farm near El Aaiún.*

8. What measures will Heidelberg Materials take to ensure that its presence does not contribute to the further entrenchment of an illegal occupation?

*You asked what measures we are taking to ensure that our activities in Western Sahara do not contribute to the consolidation of an occupation. To reiterate: we do not extract raw materials there and supply exclusively the local market.*

9. What steps will Heidelberg Materials take to obtain the consent of the Sahrawi people—required under international law—for its activities through the UN-recognized political representative, the Frente Polisario?

*Since we do not extract raw materials in Western Sahara, we have not identified any infringement of the Sahrawi people's rights for which we consider consent to be necessary.*

10. The policy statement on Heidelberg Materials' human rights strategy states that the company is committed to the UN International Covenant on Civil and Political Rights and the UN International Covenant on Economic, Social and Cultural Rights, both of which include the right to self-determination as their very first article. How do you reconcile your activities in Western Sahara with the introductory articles of these covenants, regardless of the few Sahrawi shareholders and Sahrawi employees on site?

*You asked how the company reconciles its business activities in Western Sahara with the right to self-determination enshrined in the UN International Covenant on Civil and Political Rights and the UN International Covenant on Economic, Social and Cultural Rights. The implementation of the right to self-determination falls under the jurisdiction of states. As a private company—as I have said before—we fulfill our obligation to respect the right of peoples to self-determination.*

*In Western Sahara, we use a standardized structure for stakeholder engagement in accordance with our guidelines. We apply this structure there, which facilitates regular dialogue with local communities and supports our sustainability initiatives. In doing so, we also collaborate with independent partners as needed to ensure responsible implementation.*

11. What significance do the activities in the occupied Western Sahara hold in terms of market position, and what role do they play in HDM's portfolio optimization strategy? Under what conditions would Heidelberg Materials consider ceasing its activities in the occupied Western Sahara?

*As I have already mentioned, our ongoing portfolio optimization aims to prioritize our strongest market positions. This applies to our activities in Western Sahara as well. We currently have no plans for concrete expansion there, as I noted in response to a previous question.*

#### Speech at the AGM discussion

Dear shareholders, dear Board of Management.

My name is Nina Matzik, and I am speaking today on behalf of Western Sahara Resource Watch. I am here today through the umbrella organization of critical shareholders - thank you very much for the opportunity to speak here today.

Once again this year, we are at your Annual General Meeting to point out that Heidelberg Materials is making a profit without a care in the world in Western Sahara, which is occupied in violation of international law, is cooperating well with the occupying regime, and is thereby directly contributing to the literal "cementing" of Morocco's illegal occupation of the territory. Ciments du Maroc, a subsidiary of Heidelberg Materials AG, operates two grinding plants and a ready-mix concrete plant in the occupied territory of Western Sahara. The construction materials produced at these plants are essential to the settlement policy being pursued by the occupying power, which, according to the research services of the German Bundestag, constitutes a war crime. In addition, the building materials are used for large-scale

infrastructure projects intended to ensure the future exploitation of Western Sahara's natural resources.

Morocco's occupation and the systematic exploitation of natural resources in Western Sahara have been ongoing for 51 years now. The Kingdom keeps a large part of the territory under military occupation. The people of Western Sahara, the Sahrawis, largely fled the Moroccan invasion in 1975 and have since lived in refugee camps in Algeria. The Sahrawis still living in the occupied territory today are subjected to massive human rights violations by the Moroccan occupying power.

For over 30 years, the UN mission MINURSO has been tasked with conducting a referendum in accordance with the Sahrawis' right to self-determination, as recognized under international law. However, Morocco has so far blocked all options except for Moroccan sovereignty over Western Sahara, meaning the referendum has not yet taken place. Despite hundreds of UN resolutions and rulings by international courts confirming that Morocco has no sovereignty over Western Sahara, the occupation continues. Motivated by the exploitation of the territory's resources, Morocco, hand in hand with companies like Heidelberg Materials, reaps profits and thus has little interest in genuinely participating in the UN peace process.

I am asking you specifically today:

1. How much cement or concrete did the company or its subsidiaries produce in 2024 and 2025, respectively, at the plants located in Western Sahara, and how is this amount distributed among the respective plants? Who exactly were the customers? What proportion was exported and what proportion was used locally?
2. What quantity of concrete or cement was sold in 2024 and 2025, respectively, to customers involved in the construction of the port in El Aaiún?
3. What quantity of cement or concrete were sold in 2024 and 2025, respectively, to customers involved in the construction of the "Dakhla Atlantique" port in Dakhla?
4. According to data from Heidelberg Materials for the years 2023 and 2024, Ciments du Maroc procures approximately 150,000 tons of limestone and pozzolans annually, which are mined by third-party companies owned by Sahrawis in Western Sahara. Exactly which local suppliers do you cooperate with, and what quantities were purchased from them in 2024 and 2025, respectively?
5. According to information from Heidelberg Materials from 2025, there is regular exchange within the group as well as between the plants in Morocco and Western Sahara. Is there any exchange or support beyond assistance with maintenance work? How many trips were made to Western Sahara by how many Heidelberg Materials employees to assist with maintenance work or other activities in 2024 and 2025?
6. Are there plans for further projects involving Heidelberg Materials or further expansion in the occupied Western Sahara? If so, what are they, and who are the contractual partners?

Dear Shareholders,

You should be aware that Heidelberg Materials is exposing itself to considerable risk through the activities of its subsidiary in Western Sahara. This is because the legal status of Western Sahara is clear: it must be treated as a separate and distinct territory and not as part of Morocco. The Sahrawi people's right to self-determination must also be respected by private

companies at all times. This was reaffirmed in October 2024 by three final rulings of the European Court of Justice.

Regarding the alleged benefits that the activities bring to the “local population,” Heidelberg Materials stated in 2025 that no active distinction is made between the Sahrawi population and the Moroccan residents of Western Sahara. The EUCJ, however, emphasizes that respect for the right to self-determination requires the consent of the very narrowly defined “people” of Western Sahara—and not the “population”—of Western Sahara, which now consists of more than two-thirds Moroccan settlers.

The court thus makes it abundantly clear that benefits for the local population in an occupied territory are fundamentally different from the consent of the people of that territory. And the people of Western Sahara have consistently spoken out against the presence of Heidelberg Materials on their occupied land.

That is why I ask you:

7. What specific measures have been taken to ensure that the benefits that the company derives from its business activities benefit the Sahrawi people, the people of Western Sahara, and not Morocco’s settler economy?

8. What measures will Heidelberg Materials take to ensure that its presence does not contribute to the further entrenchment of an illegal occupation?

The company benefits from Morocco’s infrastructure projects in occupied Western Sahara, which are proceeding without the consent of the region’s people. When asked whether the company had obtained the consent of the Sahrawi people, you replied in 2025 that such consent was not necessary, since HDM “does not extract raw materials” in Western Sahara and, as a private company, is “not obligated” to seek such consent. Contrary to this false representation, I have already mentioned that the Sahrawi people’s right to self-determination must also be respected by private companies at all times.

Therefore, I ask you:

9. What steps will Heidelberg Materials take to obtain the consent of the Sahrawi people—required under international law—through the UN-recognized political representative, the Frente Polisario, for its activities?

10. The policy statement on Heidelberg Materials’ human rights strategy states that the company is committed to the UN International Covenant on Civil and Political Rights and the UN International Covenant on Economic, Social and Cultural Rights, both of which include the right to self-determination as their very first article. How do you reconcile the activities in Western Sahara with the introductory articles of these covenants, regardless of the few Sahrawi shareholders and Sahrawi employees on site?

11. And finally: What significance do the activities in occupied Western Sahara hold in terms of market position, and what role do they play in HDM’s portfolio optimization strategy? Under what conditions would Heidelberg Materials consider ceasing its activities in occupied Western Sahara?

Through the activities of its subsidiary in the occupied territory, Heidelberg Materials bears responsibility for the consequences of this presence. Heidelberg Materials’ continued business operations in occupied Western Sahara contradict the Sahrawi people’s right to self-

determination, which is enshrined in international law, as well as the human rights obligations to which the company itself refers.

Thank you for your attention, and I look forward to receiving concrete answers to our questions.