

**Company Name** HeidelbergCement  
**Industry** Extractives  
**UNGP Core Score (\*)** 7.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>7.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note 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 2020 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

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>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, 07/12/2017: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>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, 07/12/2017: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	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"> <li>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, 07/12/2017: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> <li>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. The Company provided comments to CHRB in relation to the Position Statement, where it stated that 'In the case of increased risk potential or where suppliers do 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.' However, this indicator looks for specific statement to respect these rights and, if the statement makes explicit reference to the local law context, indicate that will allow parallel or alternative mechanisms. Current statement reads 'where allowable by law', which could be interpreted as suppliers are not in non-compliance situation if they don't allow the exercise of these rights in such context. [Supplier Code of Conduct 2020, 02/2020: <a href="http://heidelbergcement.com">heidelbergcement.com</a> &amp; 2019 Sustainability Report, 10/06/2020: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>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 the HeidelbergCement Group, 07/12/2017: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Respect H&amp;S of workers: In its sustainability report, the Company states that occupational health and safety is its highest priority and that HeidelbergCement uses targeted measures to improve its technical and organisational safety standards for its own and outsourced employees. [2019 Sustainability Report, 10/06/2020: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> <li>• Met: H&amp;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 2020, 02/2020: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> </ul>
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"> <li>• 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, 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, 31/05/2019: <a href="http://heidelbergcement.com">heidelbergcement.com</a> &amp; 2018 Annual Report, 21/03/2019: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: The Company has provided comments to CHRB regarding this indicator; however, evidence was not material. It refers to regular meetings with stakeholders, but no details found of engagement in the development or monitoring of the human rights approach.</li> </ul>
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"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• 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. Additional evidence was not found in more recent documents. [2018 Annual Report, 21/03/2019: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	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"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to respect ILO core conventions. [Human Rights Position of theHeidelbergCement Group, 07/12/2017: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> <li>• Not met: Senior responsibility for HR: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This indicator looks for evidence of a senior level person/committee responsible for human rights issues.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• 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, 21/03/2019: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> <li>• Not met: identifying risks in EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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"> <li>• Not met: Action Plans to mitigate risks: The Company states that 'To reinforce our efforts to combat corruption, the country organisations are working on the implementation of individual country measures that were defined during the corruption risk assessment. The same applies to competition legislation and the protection of human rights.' However, specific description found of a system for implementing action plans for the different human rights salient issues. [2019 Annual Report, 19/03/2020: <a href="http://heidelbergcement.com">heidelbergcement.com</a>]</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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"> <li>• Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1</li> <li>• Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2</li> <li>• Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Including EX business partners: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> <li>Score 2</li> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• 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 the HeidelbergCement Group, 07/12/2017: <a href="https://www.heidelbergcement.com">heidelbergcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company states that 'In 2019, only a few compliance cases were reported in the human rights area, mostly concerning discrimination'. However, no evidence of the exact number of grievances filled was found, and how many of them were either addressed or resolved. [2019 Annual Report, 19/03/2020: <a href="https://www.heidelbergcement.com">heidelbergcement.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: In the SpeakUp website, the Company presents a list of all languages of countries in which it operates, so that complaints are available in all languages. [SpeakUp: <a href="https://www.speakupfeedback.eu">speakupfeedback.eu</a>]</li> <li>• Met: Opens own system to EX BPs workers: The Company states that 'Suppliers may submit any concerns regarding non-compliant behaviour, either to applicable laws or to internal HC regulations, via our compliance hotline "SpeakUp"'. [Supplier Code of Conduct 2020, 02/2020: <a href="https://www.heidelbergcement.com">heidelbergcement.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company states that 'Each location assigns an employee to receive any local complaints. These are checked internally. Moreover, complaints may also be reported anonymously via the compliance hotline accessible to everyone'. [Human Rights Position of the HeidelbergCement Group, 07/12/2017: <a href="https://www.heidelbergcement.com">heidelbergcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The SpeakUp website is available in all languages. [SpeakUp: <a href="https://www.speakupfeedback.eu">speakupfeedback.eu</a>]</li> <li>• Not met: Expects EX BPs to have community grievance systems</li> <li>• Not met: EX BPs communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	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"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

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.

### 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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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