

Company Name LafargeHolcim
Industry Extractive
UNGP Core Score (*) 18.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
1.5	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
2	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0.5	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
1	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
18.0	26	

(*) 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"> • Met: General HRs commitment: The Company commits to respecting human rights. "We are committed to respecting and protecting human rights wherever we conduct business." [Code of Business Conduct, N/A: lafargeholcim.com] • Met: UNGC principles 1 & 2: The Company's CEO states it adheres to the UNGC Principles. "I am pleased to confirm LafargeHolcim's continued adherence to the UN Global Compact (UNGC) Principles as well as its renewed commitment to work with the UN on promoting sustainable development as a Global Compact LEAD company." [UN Global Compact - Communication on Progress (COP) 2016, 2016: lafargeholcim.com] • Met: UDHR: LafargeHolcim discloses that 'is committed to respecting international human rights standards, including the principles contained within the Universal Declaration of Human Rights, the OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises and the International Labour Organizations (ILO) Core Conventions on Labour Standards. Additionally, LafargeHolcim is signatory of the United Nations (UN) Global Compact'. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: OECD: LafargeHolcim discloses that 'is committed to respecting international human rights standards, including the principles contained within the Universal Declaration of Human Rights, the OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises and the International Labour Organizations (ILO) Core Conventions on Labour Standards'. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com]
A.1.2	Commitment to respect the human rights of 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"> • Met: ILO Core: LafargeHolcim states that 'is committed to respecting international human rights standards, including the principles contained within the Universal Declaration of Human Rights, the OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises and the International Labour Organizations (ILO) Core Conventions on Labour Standards'. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] • Met: UNGC principles 3-6: The Company's CEO states it adheres to the UNGC Principles. "I am pleased to confirm LafargeHolcim's continued adherence to the UN Global Compact (UNGC) Principles as well as its renewed commitment to work with the UN on promoting sustainable development as a Global Compact LEAD company." [UN Global Compact - Communication on Progress (COP) 2016, 2016: lafargeholcim.com] • Met: Explicitly list All four ILO apply to EX BPs: The Company states that 'LafargeHolcim is committed to meeting high social, environmental, and H&S standards and we expect our Suppliers to do likewise. [...] we expect Suppliers to adhere to the following standards'. It then lists its expectations: freedom of association and collective bargaining, forced labor, child labor, non discrimination, among others. Regarding freedom of association the Company indicates: 'Suppliers shall not interfere with worker's freedom of association and collective bargaining. Employee representatives shall not be subject to discrimination or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations. Freedom of association and collective bargaining in situations where they are restricted by local law shall be still guaranteed through other mechanisms as described by ILO (e.g. works councils)'. [Code of Business Conduct for Suppliers, 2020: lafargeholcim.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: In its Code of Conduct, the Company indicates that 'We are committed to respecting and protecting human rights wherever we conduct business. We prohibit the following practices and will not knowingly do business with any individual or company that participates in the following: exploitation of children, including child labor; (...) forced or compulsory labor; unlawful discrimination in employment and hiring practices'. Moreover, in its Human Rights Due Diligence document, it indicates that 'At LafargeHolcim we believe that every employee, independently if our own or our suppliers', should be treated with respect and dignity; compensated fairly; provided a safe workplace free of discrimination, sexual harassment; and allowed freedom of association and collective bargaining'. However, 'believe [...] should be treated' is not considered a formal commitment following CHRB wording criteria, hence no explicit commitment statement to respect freedom of association and the right to collective bargaining found. [Code of Business Conduct, N/A: lafargeholcim.com & Human Rights Due Diligence, 06/2020: lafargeholcim.com] • Met: Respect H&S of workers: The Company discloses that 'Health and safety is a core value of the LafargeHolcim Group and we will continue to act to improve the safety and the health of employees, contractors, third parties and communities'. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Met: H&S applies to EX BPs: The Company states that its Business Partners must have their own set of health and safety policies and procedures in place 'Suppliers shall provide a safe and healthy work place for their employees and contractors. (...) Suppliers must have documented health and safety policies and/or procedures in place together with appropriate safety infrastructure and equipment'. [Code of Business Conduct for Suppliers, 2020: lafargeholcim.com]
A.1.4	Commitment to engage with stakeholders	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"> • Met: Commits to stakeholder engagement: The Company indicates, in its Human Rights Due Diligence document, that 'LafargeHolcim is committed to upholding human rights and to engaging with stakeholders'. [Human Rights Due Diligence, 06/2020: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Regular stakeholder design engagement: The Company indicates, in its Stakeholder Engagement document, that 'As part of our human rights due diligence process and methodology, we engage with both internal and external stakeholders through interviews and focus groups to identify local impacts, risks and opportunities. The stakeholder mapping (...) of a specific site is consulted during the planning to define the list of stakeholders who will be invited to the consultations. [...] During these consultations, potential human rights risks will be consolidated in a human rights action plan to mitigate them. In addition, it is also a good moment to identify engagement opportunities, understand the local context, discuss community demands and potential partnerships, which are incorporated into the stakeholder engagement plan'. Moreover, in its Human Rights Due Diligence - Commitment & Methodology, it states that 'The consultation process done during the assessment also contributes to designing and implementing community programs and initiatives as part of the Stakeholder Engagement Plan (refer to LafargeHolcim Stakeholder Engagement summary)'. Lastly, in the 2019 Sustainability Performance Report, it discloses percentages of 'Stakeholder engagement plans available and reviewed in last 3 years' and 'Human rights assessments conducted in the 3 last years' as well as it expected performance for 2022. Moreover, in its Human Rights Due Diligence document, it indicates that 'The key part of an impact assessment is the consultation with internal and external stakeholders (through interviews or focus groups) to identify local impacts, risks and opportunities. (...) These include representatives of local stakeholders, such as employees, contract workers, owner/or managers of contractors companies, truck drivers, trade unions, local authorities, human rights experts, opinion formers (doctors, teachers), universities, neighbors, local communities, NGOs/Associations and/or religious organizations. A separate consultation with female representatives working in the site (employees and contractors) must be conducted'. [Human Rights Due Diligence, 06/2020: lafargeholcim.com & Stakeholder Engagement, 04/2020: lafargeholcim.com]
A.1.5	Commitment to remedy	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 remedy: The Company indicates, in a press release, that 'LafargeHolcim's approach to managing human rights is fully aligned with the UN Guiding Principles on Business and Human Rights, which establish guidelines for preventing, addressing and remedying infringements of human rights'. Moreover,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>it states, in its Human Rights Due Diligence document, that 'As part of our responsibility to respect human rights we actively engage and cooperate to remedy any adverse impacts that we have caused or contributed to'. [LafargeHolcim CEO endorses worldwide initiative to promote human rights, 19/02/2020: lafargeholcim.com & Human Rights Due Diligence, 06/2020: lafargeholcim.com]</p> <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: The Company indicates that 'As part of our responsibility to respect human rights we actively engage and cooperate to remedy any adverse impacts that we have caused or contributed to'. However, no commitment which includes collaborating in initiatives that provide access to remedy found. [Human Rights Due Diligence, 06/2020: lafargeholcim.com] • Not met: Work with EX BPs to remedy impacts: The Company indicates that 'When a Supplier does not meet our requirements, corrective action plans are to be established within a specified time-frame (depending on the severity of the issue) and LafargeHolcim will monitor progress. LafargeHolcim may support Suppliers in developing their capabilities and improving their performance. LafargeHolcim may terminate the relationship with Suppliers that repeatedly and knowingly violate the present Code of Conduct and refuse to implement improvement plans'. Moreover, in its document Procurement- Principles and Processes, it discloses a set of 'recommended actions to close breaches to our Supplier Code of Conduct'. Additionally, it explains that 'Conditionally approved suppliers are required to establish a remediation plan within a specific period of time to fix identified gaps'. However, no evidence of a commitment or work carried out in collaboration with partners to provide remedy (working with them in remedy provision) either through the extractive business partners' own mechanism of through the development of third party non-judicial remedies. [Code of Business Conduct for Suppliers, 2020: lafargeholcim.com & Procurement – Principles and Processes, 04/2020: lafargeholcim.com]

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	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"> • Met: Commits to ILO core conventions: See indicator A.1.2, the Company is committed to the UN Global Compact. • Met: Senior responsibility for HR: As stated in its 2019 Integrated Annual Report, 'Magali Anderson has been appointed as Chief Sustainability Officer and member of the Executive Committee. With this, LafargeHolcim has accelerated its efforts to be the industry leader on decarbonization, circular economy, health and safety and corporate social responsibility'. According to the document Human Rights Due Diligence, 'Accountability for human rights at LafargeHolcim is cross-functional and includes leaders responsible for our human rights approach (Executive Committee: Chief Sustainability Officer), integrity and security (Executive Committee: Head Legal and Compliance), working conditions (Executive Committee: Head Human Resources) and procurement (Executive Committee: Chief Financial Officer)'. [2019 Integrated Annual Report, 27/02/2020: lafargeholcim.com & Human Rights Due Diligence, 06/2020: lafargeholcim.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company indicates that 'In our subsidiaries, the Country CEO is the main responsible for ensuring human rights issues related to our operations and business relations are respected, in addition to guarantee a proper implementation of the human rights due diligence, the sustainable procurement and other standards related to social issues. The execution rests with the CSR / SD / Communications country coordinator. It must also be supported by the country Exco (Executive Committee), local Human Resources team and representatives from functions such as Legal & Compliance, Procurement, Logistics, Health & Safety, Recycle, Operations and Communications'. Moreover, in its 2019 Integrated Report, the Company lists Sustainability among its key operational risks and states that 'Responsibility for managing these risks is vested with site and country management, regional management, the Executive Committee and the Board of Directors'. Human Rights management (including responsible sourcing) is among its risks. Lastly, in the document Minimum Control which includes 62 mandatory controls throughout its operations, states the human rights control involves: '1. Human Rights assessment is performed as per the Group instructions defined in Human Rights Manual and approved by the entity CEO within a timetable agreed with the Group Sustainability 2. Action plans for Human Rights risks are reviewed and validated by the Local ExCo at least annually'. [Human Rights Due Diligence, 06/2020: lafargeholcim.com & 2019 Integrated Annual Report, 27/02/2020: lafargeholcim.com] • Not met: Day-to-day responsibility for EX BRs: Regarding the Control for Suppliers lies with procurement. The document Minimum Control indicates the following steps: '1. Screening of potential suppliers by Procurement (or designee) based on the criteria required by Procurement, Sustainability, and Compliance including sanctions and TPDD [...] 2. Review of supplier performance by Procurement must occur for critical and strategic critical criteria (including suppliers with high ESG impact) [...] 3. Supplier qualification must be updated at least on annual basis for critical and strategic suppliers (including suppliers with high ESG impact)'. Moreover, in its 2019 Integrated Report, the Company lists Sustainability among its key operational risks and states that 'Responsibility for managing these risks is vested with site and country management, regional management, the Executive Committee and the Board of Directors'. Human Rights management (including responsible sourcing) is among its risks. However, no further details found, including description of teams in charge of managing these issues in extractive partners. [Minimum Control, 04/2020: lafargeholcim.com & 2019 Integrated Annual Report, 27/02/2020: lafargeholcim.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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"> • Met: Identifying risks in own operations: The Company states it identifies global human rights risks according to the UN Human Development Index (HDI): 'All operating countries are classified according to potential business risk, using the UN Human Development Index (HDI) (New window) and the Freedom House (FH) Index (New window) as reference points: High Risk: FH rating "not free" or HDI < 0.70; Medium Risk: FH rating "partly free" and HDI < 0.79; Low Risk: FH rating "free" and HDI = 0.79'. It also carries out HRIA as explained below. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] • Met: identifying risks in EX business partners: The Company explicitly states in its Human Rights Management Approach document it includes "contractors and suppliers" in its Human Rights Impact Assessment (HRIA) as a tool to identify human rights risks. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company indicates that 'LafargeHolcim human rights due diligence methodology, which was based on the approach from the Danish Institute for Human Rights, has been implemented in the countries where we operate for 5 consecutive years. (...) LafargeHolcim's approach is to categorize all Countries according to the human rights risks prevalent in their operating environments, to conduct assessments according to the risk category, and to implement effective follow-up actions. (...) Systematically identifying and addressing our social impacts is crucial to manage risks and to ensure our operations are sustainable. LafargeHolcim is committed to upholding human rights and to engaging with stakeholders. The Group-wide management approach formalizes and reinforces proactive risk identification'. The entire process is found in the document Human Rights Due Diligence. [Human Rights Due Diligence, 06/2020: lafargeholcim.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: In consultation with stakeholders: The Company consults with stakeholders when assessing human rights risks, as stated in the tab Behind the Scenes: ‘The key part of the impact assessment are extensive stakeholder consultations on site, which give employees, contractors, trade unions, community members, local authorities, and NGOs an opportunity to raise concerns’. Moreover, in its Human Rights Due Diligence document, it indicates that ‘The key part of an impact assessment is the consultation with internal and external stakeholders (through interviews or focus groups) to identify local impacts, risks and opportunities. (...) These include representatives of local stakeholders, such as employees, contract workers, owner/or managers of contractors companies, truck drivers, trade unions, local authorities, human rights experts, opinion formers (doctors, teachers), universities, neighbors, local communities, NGOs/Associations and/or religious organizations. A separate consultation with female representatives working in the site (employees and contractors) must be conducted’. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com & Human Rights Due Diligence, 06/2020: lafargeholcim.com] • Met: In consultation with HR experts: The Company indicates, in its Human Rights Due Diligence document, that ‘LafargeHolcim human rights due diligence methodology, which was based on the approach from the Danish Institute for Human Rights, has been implemented in the countries where we operate for 5 consecutive years’. Also, ‘The risk level of each operating context with regard to business-related human rights issues is determined based on the UN Human Development Index (HDI) and the Freedom House Index (FH)’. Moreover, ‘LafargeHolcim can decide to invite an independent observer, such as a NGO partner, to participate in selected consultations. Independent supervision enhances the credibility of the assessment for civil society and other external stakeholders and can trigger useful inputs for LafargeHolcim. Observers should be experienced, well-regarded experts, and terms of engagement need to be clearly defined in advance’. [Human Rights Due Diligence, 06/2020: lafargeholcim.com] • Met: Triggered by new circumstances: The Company’s process of identifying new human rights risks is triggered by new country operations. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] • Met: Explains use of HRIAs or ESIA (inc HR): The Company discloses how it uses Human Rights Impact Assessment (HRIA): ‘After the consultations, the risks are prioritized based on the number of stakeholders mentioning the issue and potential risk for the Company. For the risks prioritized as high and medium, recommendations are made and presented to the country CEO. Within one month, the local ExCo usually led by the CSR team develops a detailed action plan to make improvements based on the findings. The final assessment report and action plan are then shared with the regional Executive Committee member’. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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"> • Met: Salient risk assessment (and context): The Company indicates, in its Human Rights Due Diligence document, that ‘The risk level of each operating context with regard to business-related human rights issues is determined based on the UN Human Development Index (HDI) and the Freedom House Index (FH)’. The salient risk assessment will classify countries as high, medium or low risk, according to their local context. The criteria to determine if an impact assessment is required in medium-risk countries is: ‘Country operations experienced material complaints by stakeholders related to human rights issues in the past 2 years. Country operations that have become the target of a civil society campaign with a national or international dimension within the past 3 years. Country operations in an area with a significant indigenous population and potential related issues. Countries to develop new sites, especially in a conflict-affected environment (armed conflict, civil war or other incidence of violence)’. Also, ‘Human rights impact assessments are conducted in Countries that operate in high-risk business environments or in medium-risk countries where human-rights related claims occurred in the past’. In the tab Behind the scenes, it explains that ‘Group companies operating in high-risk countries, and companies where an incident has occurred, are required to conduct a Human Rights Impact Assessment (HRIA). All other countries conduct a Human Rights Self-Assessment (HRSA). (...) Both types of human rights assessment cover at least the following 14 human rights indicators’. [Human Rights Due Diligence, 06/2020: lafargeholcim.com & Human Rights Management Approach, 01/01/2019: lafargeholcim.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Public disclosure of salient risks: The Company indicates its salient risks: 'LafargeHolcim identified 14 salient human rights issues that are particularly relevant to our business: Child labor; Forced labor; Freedom of association; Non-discrimination; Working conditions; Minimum wage; Health & Safety; Contract workers and third parties employment practices; Impact on indigenous people, living conditions, water, health, infrastructure; Land management; Security guards behavior; Bribery and corruption; Engagement with armed actors (in conflict-affected situations); Availability of a grievance mechanism (internal and external)'. [Human Rights Due Diligence, 06/2020: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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: Action Plans to mitigate risks: The Company discloses, on its tab HR Management Approach, that 'country-level human rights action plans need to address the risks and seize the opportunities identified in our own operations and in our business relationships (e.g. supply chain). The implementation and progress of the action plans is monitored through the annual LafargeHolcim Stakeholder Questionnaire. The full human rights assessment process has to be repeated every three years'. Moreover, in the document Human Rights Due Diligence, the Company indicates that 'Based on the results of the assessments (impact or self), an action plan addressing priority areas (high, medium and potential risks) must be developed by local management'. Additionally, according to the 2018 Sustainability Report: 'Following an assessment, prioritized recommendations are presented to the country CEO and a detailed local action plan is developed. Where an issue has been identified as medium or high risk, a mandatory remediation plan is enforced'. See more details below. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com & Human Rights Due Diligence, 06/2020: lafargeholcim.com] • Not met: Including amongst EX BPs: The Company indicates that 'Sustainability breaches are addressed by enforcing contractual terms and conditions and ongoing dialogue with suppliers to set remediation plans according to the consequence management process'. However, no evidence found of an actual description on how it has a global system to take action to prevent, mitigate or remediate its salient human rights issues that applies to extractive business partners. [Procurement – Principles and Processes, 04/2020: lafargeholcim.com] • Not met: Example of Actions decided: The Company provides various examples of actions to mitigate human rights risks that can, in many cases, be aligned with existing processes: 'Address findings and develop solutions in Community Advisory Panel (CAP) meetings; Mitigate risks through site-specific engagement activities defined in the context of the Stakeholder Engagement Plan; Target vulnerable groups identified in the assessment through ongoing CSR activities such as collaborative projects in Strategic Social Investment focus areas; Reinforce grievance mechanisms as an early warning system for concerns among employees, contractors and communities – most effectively through anonymous systems; Make use of employee dialogues and collective bargaining processes to address risks and to develop constructive solutions; Reinforce human rights / equal opportunities trainings for employees to disseminate information about identified risk areas, raise awareness for policies and processes, collect feedback and engage in constructive dialogue; Take advantage of existing relationships with suppliers, contractors and customers to mitigate potential risks in the value chain; Carefully consider identified risk areas when screening investments as well as in commissioning processes and feasibility studies for Capital Expenditure (CAPEX) projects'. However, an example of the specific conclusions reached and actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations was not found. [Human Rights Due Diligence, 06/2020: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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: System to check if Actions are effective: The Company has a system in place to check its remediation plan effectiveness, as stated in its 2018 Sustainability Report: 'Following an HRIA, prioritized recommendations are presented to the country CEO and a detailed local action plan is developed. (...) Progress against the plan is monitored through the annual LafargeHolcim Stakeholder Questionnaire'. Also, it explains, in its HR Due Diligence Document, that 'Progress monitoring of each action is crucial to ensure good risk management. Regular (e.g. quarterly) status updates, including on-time closure rate by the functions in charge of implementation are done. The CSR / SD / Communications Coordinator at the country is responsible for the coordination of this process and for overall oversight of action plan implementation. High risk issues will be periodically and actively followed up (e.g. monthly) by Group SD and Legal & Compliance teams directly with the country. High risk actions closure must be validated by Group SD. In order to anticipate developments in the operating environment, identified priority areas should be continuously monitored, e.g. through periodic interviews / focus groups with key stakeholders. Impact or self-assessments should be repeated after 3 years, with a special focus on high risk action closure to ensure it has mitigated the identified risk'. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com & Human Rights Due Diligence, 06/2020: lafargeholcim.com] • Not met: Lessons learnt from checking effectiveness: The Company indicates that 'All necessary steps were undertaken to investigate the facts around the dealings of LCS (Lafarge Cement Syria) with the various factions in Syria. (...) Its compliance program as it existed at the time failed to prevent these breaches. Contributing factors included for instance insufficient independence of the Internal Control function from line operations, circumvention of the internal certification procedures and the inability to conduct a field audit due to the security situation. There have been significant changes and developments made to the compliance program and infrastructure since the time of the alleged misconduct. The weaknesses in the compliance program and controls that were identified in the investigation have been assessed against LafargeHolcim's current compliance program to ensure that they are now corrected. (...) To the extent not already adequately addressed under the current compliance program, LafargeHolcim is examining its policies, protocols, and related financial controls to ensure that misconduct identified can be better detected and/or prevented all together'. However, although the Company explains how it has undergone substantial changes on its compliance program, no example of the lessons learned while tracking the effectiveness of its actions to mitigate at least one of its salient human rights risks or impacts. [Public Statement Syria, 24/04/2017: https://lafargeholcim.com 2020\2020_Lafargeholcim\LafargeHolcim_2020_fase_2.docx#_Hlk476919161,1564,1805,0,, HYPERLINK "lafarg] <p>Score 2</p> <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	0.5	<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: Comms plan re identifying risks: See indicator B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 • 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 [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] • 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 • 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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company has provided comments to CHRB regarding this indicator. One of its comments made reference to a document in Spanish and CHRB only accepts documents in English. Moreover, it made an allusion to its Integrity line. However, this datapoint is about how Company has responded to specific human rights concerns raised by, or on behalf of, affected stakeholders. No further evidence found.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Ensuring affected stakeholders can access communications: The Company indicates, in its Human Rights Due Diligence document, that 'Reporting on human rights risk management needs to be clear and easily accessible to local stakeholders, ensuring the anonymity it requires. This is added to the stakeholder engagement plans and can be done through written updates in local languages, or using our local engagement channels such as oral presentations at the community advisory panel to allow access to people with limited literacy'. [Human Rights Due Diligence, 06/2020: lafargeholcim.com]

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"> Met: Channel accessible to all workers: The Company states that has an Integrity Line that is available in 36 languages which enables employees to report any integrity-related concerns. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: Although the Company discloses data about the Integrity Line, it is not clear how many complaints are related to human rights problems: 'Of the reports in 2019, over 100 were substantiated and 43 resulted in dismissals'. [FAQ-Compliance Program, 04/2020] Met: Channel is available in all appropriate languages: The Company states its Integrity Line is available in all appropriate languages. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] Met: Opens own system to EX BPs workers: The Company states the Integrity Line is available to associated companies: 'In associated companies or joint ventures where we do not exercise equity or management control, all available means have been used to seek the adoption of the CoBC or at least equivalent standards'. Also, it indicates in its Code of Business Conduct for Suppliers that 'LafargeHolcim offers an independent channel for suppliers to raise questions and concerns about LafargeHolcim's business practices'. Moreover, in its Human Rights Due Diligence document and its tab Human Rights Approach, it explains that 'Availability of a grievance mechanism' is one of its Human Rights assessment criteria. The Company provides a contact directory and it has an Integrity Line, to report complaints'. Also, 'LafargeHolcim's Human Rights Due Diligence is complemented by a global "Integrity Line," a whistle-blowing mechanism available on our website, enabling all employees and their families, contractors, suppliers, business partners, community members and other stakeholders to report any integrity-related concerns in 38 languages'. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com & Code of Business Conduct for Suppliers, 2020: lafargeholcim.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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"> Met: Grievance mechanism for community: In its Human Rights Due Diligence document, the Company indicates that 'LafargeHolcim's Human Rights Due Diligence is complemented by a global "Integrity Line," a whistle-blowing mechanism available on our website, enabling all employees and their families, contractors, suppliers, business partners, community members and other stakeholders to report any integrity-related concerns in 38 languages'. [Human Rights Due Diligence, 06/2020: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Describes accessibility and local languages: The channel is available online and as mentioned above, it is available in 38 languages. [Human Rights Due Diligence, 06/2020: lafargeholcim.com & Integrity Line, N/A: integrity.lafargeholcim.com] Met: EX BPs communities use global system: The Company states, in its 2018 Sustainability Report, that stakeholders of associated companies may use the Integrity line to report about non-compliance of the Code of Business Conduct 'In associated companies or joint ventures where we do not exercise equity or management control, all available means have been used to seek the adoption of the CoBC or at least equivalent standards'. Also, in its Code of Business Conduct for Suppliers, it explains that 'LafargeHolcim offers an independent channel for suppliers to raise questions and concerns about LafargeHolcim's business practices'. Moreover, in its Human Rights Due Diligence document, the Company indicates that 'LafargeHolcim's Human Rights Due Diligence is complemented by a global "Integrity Line," a whistle-blowing mechanism available on our website, enabling all employees and their families, contractors, suppliers, business partners,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			community members and other stakeholders to report any integrity-related concerns in 38 languages'. In addition, it provides a page with contacts and locations. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com & Code of Business Conduct for Suppliers, 2020: lafargeholcim.com]
C.7	Remedying adverse impacts and incorporating lessons learned	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: Describes how remedy has been provided: As a response to reported allegations involving Lafarge operations at its plant in Syria, the Company explains that 'The weaknesses in the compliance program and controls that were identified in the investigation have been assessed against LafargeHolcim's current compliance program to ensure that they are now corrected'. However, no evidence found of the approach it took to provide or enable a timely remedy for victims. [Public Statement Syria, 24/04/2017: https://lafargeholcim.com/2020/2020_Lafargeholcim/LafargeHolcim_2020_fase_2.docx#_Hlk476919161,1564,1805,0,, HYPERLINK "lafarg"] • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: As a response to reported allegations involving Lafarge operations at its plant in Syria, the Company indicates that 'As a consequence of the internal review and its findings, the Board has taken a number of decisions. First of all, the Board approved the creation of a new Ethics, Integrity & Risk committee, supervised by a member of the Executive Committee. The decisions further include, with the assistance of outside counsel, continuing improvements of efforts already undertaken by the Group in the last few years, specifically the adoption of a more rigorous risk assessment process focusing in particular on high risk third parties and joint venture partners, a restricted party screening program, a new sanctions and export control program and further efforts resulting from a benchmarking exercise it has undertaken'. [LH responds to Syria Review, 02/03/2017: lafargeholcim.com] • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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		<ul style="list-style-type: none"> • Headline: Lafarge is suspected of complicity in crimes against humanity in war torn Syria • Area: Security of person, forced labour, H&S • Story: In June 2018, Lafarge was charged in France for complicity in crimes against humanity and financing ISIS in Syria. Eight former executives, including the former chief executive Bruno Lafont, have already been charged with financing a terrorist group and/or endangering the lives of others over Lafarge's activities in Syria between 2011 and 2015. According to the organisation 'Sherpa', one of the plaintiffs in the case, Lafarge purchased via intermediaries ISIS-controlled raw materials such as oil. Other allegations relate to the safety of its local workforce: workers were made to continue working despite them having to cross dangerous checkpoints amidst intense fighting, or were required to stay in the factory overnight. There are accusations that workers were threatened by the management team with sanctions and suspension of salaries should they be absent, to force them to continue coming to work, at least one worker was fired. The Company is also accused of not taking adequate precautionary protection measures for its employees and had no functioning evacuation plan for the factory site in case of an emergency. In response, the Company said it would appeal against the charges. On November 7, 2019, press sources reported that the French appeals court has cleared Lafarge on charges of crimes against humanity connected with the Company's activities in Syria. <p>According to the press, Lafarge still faces an investigation into charges of "financing terrorism", endangerment of people's lives and violation of sanctions. The investigations concern allegations of payment made to the IS in 2013 and 2014 to keep Lafarge's factories running in areas controlled by the group.</p> <ul style="list-style-type: none"> • Sources: [The Guardian, 28/06/2018: theguardian.com][ECCHR - 28/06/2018: ecchr.eu][France's Lafarge has charge of crimes against humanity lifted - Reuters - 07/11/2019: uk.reuters.com][Financial Times - 28/06/2018: ft.com]
E(1).1	The Company has responded	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"> • Met: Public response available: The company provides a number of public responses to the announcement that it has been placed under formal investigation

Indicator Code	Indicator name	Score (out of 2)	Explanation
	publicly to the allegation		<p>by French authorities in a press release. [LafargeHolcim response to Syria charges, 28/06/2018: lafargeholcim.com & Lafarge response to Syria allegations (III), 16/11/2016: lafargeholcim.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company provides a detailed response to the allegations, saying "Whilst admitting that the system of supervision of its Syrian subsidiary did not allow the company to identify wrongdoings at the level of this subsidiary, which were the result of an unprecedented violation of internal regulations and compliance rules by a small group of individuals who have left the group, Lafarge SA will appeal against those charges which do not fairly represent the responsibilities of Lafarge SA". Additionally the company's response highlights the findings of a previous report and acknowledges that the local company provided funds to third parties to work out arrangements with a number of armed groups, which included 'sanctioned parties'. The company also states that unacceptable individual errors were made in Syria until the site was evacuated in September 2014, which it firmly regrets. Further, it states that "the company will continue to fully cooperate with the legal authorities in this case". [LafargeHolcim response to Syria charges, 28/06/2018: lafargeholcim.com & Lafarge response to Syria allegations (III), 16/11/2016: lafargeholcim.com]
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The Company discloses that 'Health and safety is a core value of the LafargeHolcim Group and we will continue to act to improve the safety and the health of employees, contractors, third parties and communities'. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com & Code of Business Conduct, N/A: lafargeholcim.com] • Met: Policies apply to the type of business relationships involved: The company in its 'Code of Business Conduct' says "LafargeHolcim's Human Rights Management System is applied to all Group companies. This system looks at our own behavior as well as that in the value chain, particularly behavior of suppliers, subcontractors and other third-party service providers." [Code of Business Conduct, N/A: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company does disclose information related to injury rates and lost days (Health and Safety). However it is not a participant in the Voluntary Principles on Security and Human Rights, nor of the International Code of Conduct for Private Security Service Providers (ICoC) (Security of Persons). The company does state that 'It follows stringent rules of professionalism and integrity, aligned on the Voluntary Principles on Security and Human Rights, for which membership is currently under consideration' but being 'aligned to' is not similar to adhere to. [Sustainability Report 2017, 2017: lafargeholcim.com & Human Rights Due Diligence, 06/2020: lafargeholcim.com]
E(1).3	The Company has taken appropriate action	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: Engages with affected stakeholders: There is no publicly available evidence that LafargeHolcim engaged with the affected workers at the cement plant in Syria. In a statement to the New York Times in March 2018 LafargeHolcim said that it "maintained its operations as long as the plant and its employees could remain secure", adding that former employees were put on paid leave for more than 12 months after the closing of the site. However in that same article surviving employees claim to have sent an email requesting Lafarge carry out an internal investigation into why workers were left to fend for themselves as ISIS advanced. The employees said that the Lafarge officials never responded. [LafargeHolcim report on Syrian operations, 24/04/2017: lafargeholcim.com & New York Times article on Lafarge Syrian operations, 10/03/2018: nytimes.com] • Not met: Encourages linked business to engage affected stakeholders: There is no publicly available evidence of LafargeHolcim encouraging its linked business Lafarge Cement Syria to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: The company in media releases and a statement to the NYT says that employees at the plant were evacuated in 2014 and received payment until December 2015. However, there is no further details regarding the remedy provided to victims and this payment is not sufficient to be considered remedy. [New York Times article on Lafarge Syrian operations, 10/03/2018: nytimes.com & LafargeHolcim response to Syria charges, 28/06/2018: lafargeholcim.com] • Met: Has reviewed management systems to prevent recurrence: The company, in a publicly released summary of the investigation into its Syria operations: "As a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>consequence of the internal review and its findings, the Board has taken a number of decisions. First of all, the Board approved the creation of a new Ethics, Integrity & Risk committee, supervised by a member of the Executive Committee. The decisions further include, with the assistance of outside counsel, continuing improvements of efforts already undertaken by the Group in the last few years, specifically the adoption of a more rigorous risk assessment process focusing in particular on high risk third parties and joint venture partners, a restricted party screening program, a new sanctions and export control program and further efforts resulting from a benchmarking exercise it has undertaken." [LafargeHolcim report on Syrian operations, 24/04/2017: lafargeholcim.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no publicly available evidence that appropriate remedy has been provided to the workers at the Lafarge Cement Syria site, nor that the remedy was satisfactory to the victims. [LafargeHolcim response to Syria charges, 28/06/2018: lafargeholcim.com & New York Times article on Lafarge Syrian operations, 10/03/2018: nytimes.com] • Not met: Has improved systems and engaged affected stakeholders: The company identifies specific areas and changes that it has improved in its management systems "The weaknesses in the compliance program and controls that were identified in the investigation have been assessed against LafargeHolcim's current compliance program to ensure that they are now corrected...To the extent not already adequately addressed under the current compliance program, LafargeHolcim is examining its policies, protocols, and related financial controls to ensure that misconduct identified can be better detected and/or prevented all together". However there is no publicly available evidence that the company has meaningfully engaged with stakeholders affected at its Syrian operations. [LafargeHolcim report on Syrian operations, 24/04/2017: lafargeholcim.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: UPDATE: LafargeHolcim accused of abandoning victims of child labour in its supply chain in Uganda • Area: Child labour • Story: On May 8th, 2018 at LafargeHolcim's AGM, NGOs Bread for all and the Catholic Lenten Fund accused the company of delaying compensation to alleged child labour victims in Uganda. In a previous study, conducted in 2017, Bread for All and TLC alleged that for more than ten years, Hima Cement, a subsidiary of the LafargeHolcim cement group, had benefited from the work of around 150 children and young people. They were cheap labour in the mining of Pozzolan, an additive for cement production. Bread for All claim that since January 2017, when the allegations became public, the Franco-Swiss company has been buying the raw material from mechanized quarries that employ adults only. The NGOs say that as a result, many small-scale miners lost their jobs and earnings from one day to the other. The NGOs claim that "LafargeHolcim and its suppliers continue to dodge their responsibilities, even though they are requested to provide remediation according to the UN Guiding Principles for Business and Human Rights (UNGPR)". They also renewed their demands to support former child labourers in making up for missing school years and provide vocational training for them. LafargeHolcim and its subsidiary Hima Cement claim that an external investigation found no evidence of child labour in Hima Cement's supply chain, however the company refused to make the report public. • Sources: [Global Cement - 10/05/2018: globalcement.com][Bread for All - 08/05/2018: breadforall.ch][BHRR - 15/05/2018: business-humanrights.org][Swissinfo.ch - 08/05/2018: swissinfo.ch]
E(2).1	The Company has responded publicly to the allegation	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: Public response available: The company has a public response available [SwissInfo article, 08/05/2018: swissinfo.ch] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company and its subsidiary Hima Cement Limited denied using child labour in their supply chain. Shortly after the company also announced that it would stop buying raw materials from artisanal miners and only source from mechanized quarries employing adults. The same month LafargeHolcim commissioned an investigation by an international independent auditor, which concluded that there was no material evidence that children had worked for Hima Cement or for any of its other suppliers, however this report was not made public. [SwissInfo article, 08/05/2018: swissinfo.ch]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The company says "We prohibit the following practices and will not knowingly do business with any individual or company that participates in the following; exploitation of children, including child labour" [Code of Business Conduct, N/A: lafargeholcim.com] • Met: Policies apply to the type of business relationships involved: The company says "LafargeHolcim Human Rights Management System is applied to all group companies. This system looks at our own behavior as well as that in the value chain, particularly behavior of suppliers, subcontractors and other third-party service providers." [Code of Business Conduct, N/A: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company in its 'Code of Conduct' explicitly prohibits child labour. In its Supplier Code of Conduct it says "Suppliers shall not employ children at an age where education is still compulsory. Children under the age of 18 or below the legal minimum age, shall not be employed." However there is no elaboration of age verification processes. [Code of Business Conduct, N/A: lafargeholcim.com & Supplier Code of Business Conduct, 2019: lafargeholcim.com]
E(2).3	The Company has taken 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"> • Not met: Denies allegations, but has engaged affected stakeholders: The company engaged an international independent auditor to investigate whether child labour was present in its supply chains however the company does not provide any evidence of the type of engagement that was undertaken. [SwissInfo article, 08/05/2018: swissinfo.ch] • Not met: Denies allegations, but reviewed systems to prevent such impacts: The company never published the report that was conducted by an independent auditor, nor has it provided evidence of the review that was conducted into its supply chain systems relating to artisanal miners. [SwissInfo article, 08/05/2018: swissinfo.ch] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: The company said the independent audit concluded that there was no material evidence that children had worked for Hima Cement or for any of its other suppliers. However, aside from no longer sourcing raw products from artisanal miners, there is no evidence of what changes were implemented in the company's procurement practices following the review. [SwissInfo article, 08/05/2018: swissinfo.ch] • Not met: Denies allegations, and ensures systems prevent such impacts: Although the company has announced it will only source raw materials from mechanized quarries employing adult workers, it has not provided evidence of how it reviewed its management systems to prevent impacts, such as child labour, from occurring in the future. [SwissInfo article, 08/05/2018: swissinfo.ch]
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Local communities urged Lafarge Cement to clean coal spill in Indonesia • Area: Environmental damage • Story: On August 6, 2018, the General Secretary of the Network Coalition for Aceh Maritime Advocacy demanded that Lafarge Cement Indonesia take responsibility for the clean-up after a barge delivering coal to the Company's cement plant spilled around 7000 tonnes of coal on the North Sumatra coastline on July 30, 2018. According to Mongabay News, local fishermen and activists said that the spilled coal damaged coral and killed marine life, devastating the livelihoods of the community while also affecting local tourism. Environmental experts are now pushing for a lawsuit against the Company. • Sources: [Global Cement – 08/08/2018: globalcement.com][– Cemnet – 07/08/2018: cemnet.com][– Mongabay News – 06/08/2018: news.mongabay.com]
E(3).1	The Company has responded publicly to the allegation	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: Public response available: LafargeHolcim has not issued a public response to the allegation. The company states that it has divestment out of Indonesia in 2019 but this is not a response that addresses the allegation <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: LafargeHolcim has not issued a public response to the allegation.

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).2	The Company has appropriate policies in place	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"> • Met: Company policies address the general issues raised: LafargeHolcim's 2019 Code of Business Conduct for Suppliers stipulates that suppliers must "...systematically manage their environmental impacts with respect, but not limited to: energy, water, waste, chemicals, air pollution and biodiversity and set objectives and targets to reduce such impacts. Suppliers identified as having a high environmental impact shall take action and demonstrate proof of continuous improvement towards having a recognized Environmental Management System in place." [Supplier Code of Business Conduct, 2019: lafargeholcim.com] • Met: Policies apply to the type of business relationships involved: LafargeHolcim's 2019 Code of Business Conduct for Suppliers applies to all company suppliers. [Supplier Code of Business Conduct, 2019: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: LafargeHolcim states in its 2019 Code of Business for Suppliers that all Suppliers shall systematically manage their environmental impacts with respect, but not limited to: energy, water, waste, chemicals, air pollution and biodiversity and set objectives and targets to reduce such impacts. Suppliers identified as having a high environmental impact shall take action and demonstrate proof of continuous improvement towards having a recognized Environmental Management System in place." [Supplier Code of Business Conduct, 2019: lafargeholcim.com]
E(3).3	The Company has taken 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"> • Not met: Engages with affected stakeholders: The company has not appear to have engaged with the affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: LafargeHolcim does not appear to have encouraged linked business to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: LafargeHolcim does not appear to have provided any remedies to the affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: LafargeHolcim does not appear to have reviewed any management systems in response to the incident. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: The company has not taken responsibility for its involvement and has not provided any remedies. • Not met: Has improved systems and engaged affected stakeholders: The company has not improved systems in response to the allegations.
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: LafargeHolcim's subsidiary Apasco fires workers for joining union in Mexico • Area: Freedom of association, security of persons, health & safety • Story: On 2 April 2019, IndustriALL Global Union raised concern over LafargeHolcim's subsidiary Apasco firing 6 workers in Hermosillo, Mexico between 28 and 29 March for joining the miners' union Los Mineros, an affiliate of IndustriALL Global Union. The Company attempted to justify these dismissals as part of the restructuring. <p>Earlier in February 2017, the Company had already fired 6 workers for joining the union after being informed by the management-controlled union, a member of the Confederation of Mexican Workers (CTM). The workers tried to sue the company for violation of their rights and illegal dismissals but the Company responded that the reason for dismissal was absenteeism, since workers stopped attending work.</p> <p>According to IndustriALL Global Union, Apasco practices an extreme form of outsourcing: some 500 of the 600 employees are outsourced workers with poor salaries and no social protection. According to audio records of the procedure of dismissal collected by activists, workers also complain of constant threats of dismissal from CTM and report safety regulation violations leading to accidents, including the loss of fingers.</p> <ul style="list-style-type: none"> • Sources: [IASWI - 02/04/2019: workers-iran.org] [] [] []
E(4).1	The Company has responded publicly to the allegation	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: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The Company's Code of Business Conduct includes policy related to health and safety. Additionally, the Code states 'We all strive to create an environment in which personal dignity, privacy, freedom of association and collective bargaining, and the personal rights and safety of every individual are part of our everyday work experience.' [Code of Business Conduct, N/A: lafargeholcim.com] • Met: Policies apply to the type of business relationships involved: In relation to freedom of association, the Supplier Code of Business Conduct states 'Suppliers shall not interfere with worker's freedom of association. Employee representatives shall not be subject to discrimination or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations.' Additionally, for health and safety, it states 'Suppliers shall provide a safe and healthy work place for their employees and contractors.' [Supplier Code of Business Conduct, 2019: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: While the Company reports on health and safety indicators, no measures could be found to guarantee rights of freedom of association. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com]
E(4).3	The Company has taken 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"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

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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