

Company Name LafargeHolcim
Industry Extractive
Overall Score (*) 24.5 out of 100

Theme Score	Out of	For Theme
2.4	10	A. Governance and Policies
8.1	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
1.9	20	D. Performance: Company Human Rights Practices
6.3	20	E. Performance: Responses to Serious Allegations
3.7	10	F. Transparency

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

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

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows: 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, Not available.: 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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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	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: 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] Not met: Explicitly list All four ILO apply to EX BPs: The Company explicitly lists almost all four ILO Fundamental rights in its Supplier Code of Business Conduct. It, however, fails to explicitly state a policy regarding collective bargaining. [Supplier Code of Business Conduct, 2019: lafargeholcim.com & UN Global Compact - Communication on Progress, 01/2018: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core: See above. [Code of Business Conduct, Not available.: 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." [Supplier Code of Business Conduct, 2019: lafargeholcim.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Based on UN Instruments: The Company states that 'participate in the UN Global Compact and support the Universal Declaration of Human Rights. We apply related Declarations and Principles. Among others: UN Guiding Principles on Business and Human Rights (UNGPs) 2011, the International Bill of Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, UN Declaration on the Rights of Indigenous People'. However, to participate on the instruments described is not enough for this indicator. CHRB looks for commitment to instruments in the context of security. [Code of Business Conduct, Not available.: lafargeholcim.com & Corporate Citizenship Policy, 02/11/2015: lafargeholcim.com] Not met: Voluntary Principles (VPs) participant Not met: Uses only ICoCA members Not met: Respecting indigenous rights Not met: ILO 169 Met: UN Declaration on the Rights of Indigenous People (UNDRIP): The Company discloses that 'participate in the UN Global Compact and support the Universal Declaration of Human Rights. We apply related Declarations and Principles. Among others: UN Guiding Principles on Business and Human Rights (UNGPs) 2011, the International Bill of Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, UN Declaration on the Rights of Indigenous People' [Corporate Citizenship Policy, 02/11/2015: lafargeholcim.com] Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> Met: FPIC commitment: The Company commits to the FPIC. "Protection of indigenous people with two objectives for the Group: 100% of new projects having an environmental and social impact assessment. Free prior informed consent when

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>any relocation is planned." [Our Approach to stakeholder engagement, 2015: lafargeholcim.com]</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company commits to an annual engagement plan including dialogue and meetings with stakeholders. "Stakeholder prioritization should be undertaken by each operation, annually, by reviewing a range of stakeholder groups (including employees and unions, subcontractors, elected representatives and authorities, regulators, local dignitaries/leaders, residents, NGOs, other industries & companies, trade associations, media, schools & universities...)." "The second step focuses on the development and implementation of a site annual stakeholder engagement action plan. This should include regular interactions with stakeholders to build and maintain dialogue, inform on site activities and collect feedback." [Our Approach to stakeholder engagement, 2015: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder design engagement: The Company discloses that engages with the communities and also with a range of stakeholders at all levels of the organization. As an example describes that engages with Community on an ongoing basis by 'community advisory panels, Plant open days and tours, One-on-one meetings, Community forums and Social media'. However, the Company does not describes how it engages stakeholders on the design and/or monitoring of its human rights approach. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company states 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. LafargeHolcim's Human Rights Management Approach is complemented by a global "Integrity Line," a whistle-blowing mechanism enabling employees to report any integrity-related concerns in 38 languages. It is a safe, confidential way to report possible Code of Business Conduct violations or raise compliance-related questions'. However, the Company does not describe a formal commitment to remedy adverse impacts related to human rights identified on its operation. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts: The Company describes 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. During the tendering process LafargeHolcim reserves the right to exclude Suppliers that are not compliant with local, national or international laws or regulations'. However, there is no description about the commitment to work with its suppliers to remedy adverse impacts. [Supplier Code of Business Conduct, 2019: lafargeholcim.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: CEO or Board approves policy: Both the Group's CEO and General Counsel signed the Code of Business Conduct in which the Company committed itself to respecting human rights. [Code of Business Conduct, Not available.: lafargeholcim.com] Not met: Board level responsibility for HRs Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member: The Company discloses that 'in terms of employee rewards, we simplified our global bonus scheme and focused objectives on the results which fit our Group goals. Our aim is to drive performance by assuring people are rewarded based on the performance of their own P&L. Our long-term incentive scheme aims at executives. Its performance metrics have also been redesigned to better reflect the desired sustained performance of our business'. However, the Company does not describe incentives for board members related to human rights. [Annual Report 2018, 17/4/2019: lafargeholcim.com] Not met: At least one key EX RH risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2, the Company is committed to the UN Global Compact. Not met: Senior responsibility for HR: LafargeHolcim discloses that 'proactively manages human rights through its Human Rights Management Approach, supported by an internal Human Rights Directive which outlines the mandatory requirements for all LafargeHolcim country operations'. However, does not describes the senior manager roles responsible for human rights issues [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights: The Company 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 and is signatory of the United Nations (UN) Global Compact. However, there is no indication that exist an incentive or performance management scheme linked to aspects of its human rights policy commitment for at least one senior manager. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] Not met: At least one key EX HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR risks is integrated as part of enterprise risk system

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risk management		Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions: See indicator A.1.2 [Code of Business Conduct, Not available.: lafargeholcim.com] • Met: Communicates its policy to all workers in own operations: The Company communicates its code of conduct to all workers. "All employees receive introductory and regular ethics and compliance training. The Code is also available in 28 languages and has been issued in all group companies. [Code of Business Conduct, Not available.: lafargeholcim.com & Operating principles, May/2019: lafargeholcim.com] Score 2 • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 [Code of Business Conduct, Not available.: lafargeholcim.com] • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers: The Company explicitly lists almost all four ILO Fundamental rights in its Supplier Code of Business Conduct. It, however, fails to explicitly state a policy regarding collective bargaining. [Supplier Code of Business Conduct, 2019: lafargeholcim.com] • Not met: Communicating policy to EX contractors and joint ventures • Not met: Including to EX BPs (removed) Score 2 • Not met: How HR commitments made binding/contractual: The Company states that "LafargeHolcim may terminate the relationship with Suppliers that repeatedly and knowingly violate the present Code of Conduct and refuse to implement improvement plans." Despite this, the Company did not disclose proof that respecting human rights is inserted in contractual agreements with suppliers. [Supplier Code of Business Conduct, 2019: lafargeholcim.com] • Not met: Including on EX BPs
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company trains all workers in human rights commitments. "All employees receive introductory and regular ethics and compliance training. These sessions are opportunities for you to raise questions and to discuss how to make this Code part of your daily work in practice. The company also added that the CoBC is available in 28 languages and has been issued in all Group companies. " [Code of Business Conduct, Not available.: lafargeholcim.com & Operating principles, May/2019: lafargeholcim.com] • Not met: Trains relevant EX managers including security personnel Score 2 • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The company states "all countries will adhere to human rights, fully aligned with the UN Guiding Principles on Business and Human Rights. Our Human Rights Management System categorizes countries into low, medium, or high business risk, using the UN Human Development Index and Freedom House's Freedom in the World Index. Countries identified as high risk (and countries where an incident has occurred) will conduct a full Human Rights Impact Assessment (HRIA), while all other countries must conduct a self-assessment. This will be done every three years. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com & Operating principles, May/2019: lafargeholcim.com] • Not met: Monitoring EX BP's: The Company discloses that for 'all existing and potential new suppliers with high ESG4 impact are qualified against our Supplier Code of Conduct. Recognizing the importance of responsibility in our value chain, we have issued a Supplier Code of Conduct, informed by the UNGC principles, and the code is communicated to all suppliers'. However, there is no description about

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>how its suppliers and business partners are monitored on human rights issues. [Operating principles, May/2019: lafargeholcim.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored: In its Sustainability Report the Company discloses that 'by the end of 2018, high ESG impact suppliers, accounting for 62 percent of the total spend covered by high ESG impact suppliers (2017: 53 percent), had been qualified. We will strive to achieve full coverage as soon as possible'. However, there is no mention about the proportion of its supply chain monitored on human rights issues. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com]
B.1.7	Engaging business relationships	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: HR affects selection EXs business partners: According to the Company, all new suppliers must adhere to the Company's Code of Business Conduct for Suppliers. "This Code of Conduct applies to all LafargeHolcim Suppliers and it is communicated to potential and existing Suppliers. As part of the qualification process new suppliers should be assessed to ensure adherence to the standards stipulated in this document." [Supplier Code of Business Conduct, 2019: lafargeholcim.com] • Met: HR affects on-going EX business partner relationships: The Company states it may terminate business relations with suppliers that fail to adhere to the Code of Business Conduct for Suppliers. "LafargeHolcim may terminate the relationship with Suppliers that repeatedly and knowingly violate the present Code of Conduct and refuse to implement improvement plans." [Supplier Code of Business Conduct, 2019: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Met: Working with EX business partners to improve performance: The Company describes a case in which works with suppliers and states that 'To encourage alignment with the LafargeHolcim Supplier Code of Conduct and Sustainable Procurement Directive, our Central America cluster has developed a program to strengthen supplier competencies in our focus areas of health and safety, climate, circular economy, environment and communities. The program consists of supplier forums and workshops where suppliers are provided with documentation, tools and knowledge to enable them to run a sustainable business, aligned with our Supplier Code of Conduct'. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: The Company discloses that engages with a range of stakeholders at all levels of the organization and describes its key stakeholder groups, which are customers, employees, communities, investors and financial institutions, suppliers, regulators, media, NGOs/development agencies and academia, the issues that are engaged with them and how is made this engagement. However, there is no description about how the Company identifies each group of possible affected stakeholders. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Not met: Frequency and triggers for engagement: On its Sustainability report, the Company discloses that engages with stakeholders on an 'ongoing' or 'as required' frequency, which is not sufficient. Also, the Company states that 'Stakeholders are engaged at all our sites. Every country will have formal stakeholder engagement plans in place covering all our cement sites and our most material aggregate and concrete sites. These plans will be developed in collaboration with local stakeholders such as municipal officials and community associations. These plans will be reviewed and updated every three years'. However, to state that the countries will have formal stakeholder engagement plans does not imply that the engagement already exists. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com & Operating principles, May/2019: lafargeholcim.com] • Not met: Engagement includes EX business partners workers: The Company describes that promotes 'community engagement and relationships based on mutual respect and trust with all local stakeholders. We assess local needs and partner with local stakeholders around our operations to contribute to educational, cultural, social and economic development. We encourage and support employees' engagement in volunteering and local community work'. However, it is not clear if

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>this engagement includes workers among its business partners. [Corporate Citizenship Policy, 02/11/2015: lafargeholcim.com]</p> <ul style="list-style-type: none"> • Not met: Engagement includes EX business partners communities <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: 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 " [Human Rights Management Approach, 01/01/2011: 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, 2011: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Met: In consultation with stakeholders: The Company consults with stakeholders when assessing human rights risks. "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." [Human Rights Management Approach, 2011: lafargeholcim.com] • Not met: In consultation with HR experts • 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, 2011: 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, 2011: lafargeholcim.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) [Human Rights Management Approach, 2011: lafargeholcim.com] • Met: Public disclosure of salient risks: The Company discloses a list of potential salient human rights risks. Those are: "Child labor; Forced labor; Freedom of Association; Non-discrimination; Working conditions; Minimum wage; Health & Safety; Contract Workers; Community impact (e.g. on the environment, health, livelihood, etc.); Land management; Security guards; Bribery and corruption; Support of armed actors; Grievance mechanisms" [Human Rights Management Approach, 2011: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Not met: Action Plans to mitigate risks: The Company discloses 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'. 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 [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] • Not met: Including amongst EX BPs

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			<ul style="list-style-type: none"> • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	1	The individual elements of the assessment are met or not as follows: Score 1 <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. "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." [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks: Although the Company describes that 'the 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'. The Company does not demonstrate how it communicates externally about its human rights impacts and how effective it has been in addressing those impact. [Human Rights Management Approach, 01/01/2019: lafargeholcim.com] • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: 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] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: Although the Company discloses data about the Integrity Line, it does not explicitly disclose how many complaints are related to human rights problems. 'In 2018, 801 reports related to the CoBC were received by Group Investigations through the Integrity Line and other channels. By the end of the year, 668 cases had been closed. The remaining 133 cases were still under investigation as at 31 December 2018'. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • 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] • Not met: Expect EX BPs to have equivalent grievance system • Not 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." Moreover, even though the company states in its webpage this channel is available globally, it did not mention it in its Code of Business Conduct for Suppliers that the Integrity Line is available for supplier's employees. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: The Company does not provide a grievance mechanism for communities, only for workers worldwide. [Code of Business Conduct, Not available.: lafargeholcim.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	external individuals and communities		<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Company does not disclose how it ensures the channel is accessible. "The CoBC is supported by a variety of speak-up channels, including the global 'Integrity Line,' which enables employees to report any integrity-related concerns. Available in 36 languages, it is a safe and confidential way to report possible CoBC violations or raise compliance related questions." [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Not met: Expects EX BPs to have community grievance systems • Met: EX BPs communities use global system: The Company states 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." However, suppliers and other extractive business partners may not. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company provides a website for its grievance mechanism with a Frequent Asked Questions section. However, does not describe timescales for addressing the concerns and informing the complainant. [Integrity Line: integrity.lafargeholcim.com] • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	<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: Public statement prohibiting retaliation: The Company does not tolerate retaliation against any employee who reports a concern in good faith 'Protection from retaliation LafargeHolcim does not tolerate retaliation against any employee who reports a concern in good faith'. However, this statement from the Company is valid only for workers, which is not enough for this indicator that looks also for a valid statement prohibiting retaliation on external stakeholders such as local communities. [Code of Business Conduct, Not available.: lafargeholcim.com] • Met: Practical measures to prevent retaliation: The Company states that individuals who take action against a person for raising a concern or participating in an investigation will be subject to disciplinary action, up to and including termination of employment. [Code of Business Conduct, Not available.: lafargeholcim.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation: The Company only states that "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." [Supplier Code of Business Conduct, 2019: lafargeholcim.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms: The Company states all employees are prohibited to impede internal investigations, not external ones. "As such, employees are required to cooperate fully and honestly in any investigation, audit or internal control activity, which includes promptly responding to all information requests." No evidence found of commitment to not impede access to other mechanisms for persons who make allegations about human rights. [Code of Business Conduct, Not available.: lafargeholcim.com] • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Member of EITI • Not met: Reports of taxes and revenues beyond legal minimums: LafargeHolcim Group discloses that Tax policy and Transfer pricing directive provide the binding rules for all countries where it operates. However, the Company does not report by country the taxes and payments to some countries beyond legal requirements for disclosure. [Annual Report 2018, 17/4/2019: lafargeholcim.com] Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Although the Company commits to create a safe environment for employees, it does not commit itself not to interfere in its employees freedom of association nor to retaliate. "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. We believe respect in the workplace is fundamental to performance and engagement." "LafargeHolcim does not tolerate retaliation against any employee who reports a concern in good faith. Individuals who take action against a person for raising a concern or participating in an investigation will be subject to disciplinary action, up to and including termination of employment." [Code of Business Conduct, Not available.: lafargeholcim.com] • Not met: Discloses % covered by collective bargaining: The Company discloses the number of entities where employees are covered by collective agreements, however there is no information about how many workers are related to these entities. "Entities where employees are covered by collective agreements: (%) 59" [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company discloses data about injury rates, lost days and fatalities. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Met: Lost days or near miss disclosures: The Company discloses data about injury rates, lost days and fatalities. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Met: Fatalities disclosures: The Company discloses data about injury rates, lost days and fatalities. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company set targets for people and communities that regard better health and safety results by 2030. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Not met: Met targets or explains why not

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment Score 2 <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach Score 2 <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks: The Company has a freshwater withdrawal reduction plan in place and plans on broadening its performance on the topic. This, however does not meet criteria, as it is not clear whether plans consider water usage by local communities and other users, in the context of guaranteeing access to safe water. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] Score 2 <ul style="list-style-type: none"> • Not met: Water targets considering local factors: The Company does not commit to respecting right to water of stakeholders in own extractive operations. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com] • Not met: Reports progress in meeting targets and shows trends in progress made: See above. [Sustainability Report 2018, 14/3/2019: lafargeholcim.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<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. • Sources: [The Guardian, 28/06/2018: theguardian.com][ECCHR - 28/06/2018: ecchr.eu][BHRRC - 28/06/2018: business-humanrights.org][Financial Times - 28/06/2018: ft.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).1	The Company has responded publicly to the allegation	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 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>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	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: Company policies address the general issues raised: The company on its 'Human Rights Management Approach' says "LafargeHolcim is committed to respecting international human rights standards, including the principles contained within the Universal Declaration of Human Rights" (Security of Persons). However the company doesn't have a publicly available statement of policy committing it to respecting the health and safety of workers (Health & Safety). [Human Rights Management Approach, 2011: lafargeholcim.com & Code of Business Conduct, Not available.: 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, Not available.: 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). [Sustainability Report 2017, 2017: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>operations, 10/03/2018: nytimes.com & LafargeHolcim response to Syria charges, 28/06/2018: lafargeholcim.com</p> <ul style="list-style-type: none"> • Met: Has reviewed management systems to prevent recurrence: The company, in a publicly released summary of the investigation into its Syria operations, says "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" [LafargeHolcim report on Syrian operations, 24/04/2017: lafargeholcim.com] <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][BHRC - 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, Not available.: 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, Not available.: 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, Not available.: 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. <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	The individual elements of the assessment are met or not as follows: Score 1 <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] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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. Score 2 <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.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.68 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, LafargeHolcim made data public that met one or more elements of the methodology in 16 cases, leading to a disclosure score of 1.68 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Met: Company reports on GRI: According to the Sustainability Report, the Company reports on GRI. [Sustainability Report 2017, 2017: lafargeholcim.com] Not met: Company reports on SASB Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	LafargeHolcim met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> Not met: Score 2 for A.2.2 : Board discussions Not met: Score 2 for B.1.6 : Monitoring and corrective actions Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

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

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

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