



Code of Conduct

Holcim Ltd



Our Code of Conduct
is the guide to the way
we do business*

Code of Conduct

This Code of Conduct establishes a common and consistent framework across our global organization for how we will achieve our mission and goals. It provides direction and clarification in how we conduct our daily business. High business ethics and personal integrity ensure our credibility and reputation as a Group.

Corporate Governance

Corporate Governance aims at protecting the legitimate interests of our stakeholders in an appropriate and effective way.

Corporate Governance considerations are consistently reflected in our evolving organizational structure and procedures.

Corporate Social Responsibility

We recognize our social responsibility and aim to improve the quality of life of our workforce, their families and the communities around our operations.

We pursue a clear policy dealing with employment practices, occupational health and safety, community involvement as well as customer and supplier relations.

Sustainable Environmental Performance

We strive to preserve the environment for future generations by striking a balance between economic growth and continuously improving environmental performance and social responsibility.

Compliance

Appropriate measures are put in place to assist in complying with applicable laws and regulations in the businesses and countries where we operate. In particular with regard to:

Fair Competition

We respect the principles and rules of fair competition prohibiting anti-competitive behaviors and the abuse of a dominant market position.

Bribery and Corruption

We will not utilize bribery and corruption in conducting our business. We will not offer or provide, either directly or indirectly, any undue pecuniary or other advantage for the purpose of obtaining, retaining, directing or securing any improper business advantage.

Insider Trading

Each of us who has access to insider information, likely to result in substantial movements in the price of the stock or any other financial instruments of an involved company, shall comply with applicable insider-trading laws.

Use and Protection of Assets and Information

Each of us entrusted with property belonging to or controlled by Holcim is responsible for the careful use, protection, expenditure and administration of such assets.

We use and protect confidential proprietary information, except to the extent we are required to disclose such information in the proper course of our duties.

We pay particular attention to IT aspects such as data protection and data security.

Conflict of Interest

In situations in which our personal or financial interests may conflict materially with those of Holcim, we are expected to fully disclose them.

We shall not take part in any business activities of Holcim where we may be influenced by our personal relations that are, or may be, construed as a hindrance to objective decision taking.

If we see ourselves in a potential conflict of interest, we shall seek advice from line management or from our legal counsel so that an appropriate solution can be found.

Gifts and Donations

We are prohibited from offering, soliciting or accepting gifts and donations related to our business. However, entertainment and gifts of insignificant monetary value arising out of ordinary corporate hospitality are acceptable.

Donations for political or social purposes are permitted only within the limits of local laws and in complete transparency.

Records and Accounting

All business transactions are recorded in a true, fair and timely fashion.

In accordance with established procedures, appropriate accounting systems, controls and audits, we ensure the reliability and accuracy of our accounts, records and reports.

Communication

We have a clear communications policy with our shareholders, employees and other stakeholders. We commit ourselves to open, transparent, impartial and timely information.

Responsibility

Each of us is responsible to know the relevant laws and regulations including this Code of Conduct.

In all business situations where the requirements of the law or this Code of Conduct appear incomplete or unclear, each of us shall use good judgment and common sense, and if needed, seek advice from line management or our legal counsel.

All of us are expected to adhere to this Code of Conduct in both the letter and the spirit. Violations against this Code of Conduct will not be tolerated. Non-compliance may be subject to disciplinary sanctions including termination of employment.

A handwritten signature in black ink, appearing to read 'R. Soiron'.

Rolf Soiron
Chairman of the Board

A handwritten signature in black ink, appearing to read 'M. Akermann'.

Markus Akermann
Chief Executive Officer



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