

## 2.5 Conflicts of interest

We are all required to make business decisions in the best interests of LafargeHolcim, not based on personal interests.

A conflict of interest may arise when our personal interests interfere, or may be perceived as interfering, with our ability to perform our jobs effectively and fairly. Where we can, we avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing business on behalf of LafargeHolcim.

When such relationships or activities cannot be avoided, you must disclose them promptly to your supervisor and your local compliance officer. In addition, you should similarly disclose

any personal interest that could be perceived as having a connection with the execution of your professional duties. In case of doubt, disclosing such relationships or activities in your interest. Transparency often removes any perception of improper activity.

### Outside engagements

You may be invited to serve as a director, consultant or member of management of an outside organization. You should first check whether such engagement is allowed under the terms of your employment contract, and in addition make sure

that it would not unduly interfere with your work for LafargeHolcim. Further, if this organization is a competitor, conducts business with LafargeHolcim, or is a public or state-owned company, the engagement must be approved by your local compliance officer and supervisor. The same approvals are required for employees wishing to run for public office. While not necessarily prohibited, many official public positions will present actual or potential conflicts of interest for the holder with the business of LafargeHolcim.



We never use LafargeHolcim property or information for personal gain or take personal advantage of any opportunity that arises in the course of our work for LafargeHolcim.

## What does this mean for me?



A technical equipment supplier has delivered what turns out to be defective machinery and you recognize this after it has been installed. Your father-in-law owns the supplying company, and you therefore consider not having the defect remedied.

**Your decision-making should not be influenced by a personal relationship with the supplier. It is your duty to act in LafargeHolcim's best interests. You should also report the conflict to your supervisor and inform your local compliance officer about the fact that you have a personal relationship with the owner of the supplier.**



I have been approached by friends to invest in a company that produces raw materials for supply in the LafargeHolcim market. Does it constitute a conflict of interest if I take only a financial stake, without any say in the management?

**It is at least a potential conflict. Whether it is an actual conflict depends on various factors, including:**

- The position you hold in LafargeHolcim;
- The influence you have in the selection of LafargeHolcim suppliers;
- The amount of your investment and relative shareholding;
- The importance of LafargeHolcim as a prospective customer.

**In any event, you should inform your supervisor and your local compliance officer before investing in the company to obtain proper guidance and counseling. In addition, there may also be competition-related aspects to consider.**

