

2.6 Insider trading

LafargeHolcim supports open and fair securities markets because they are key to building trust and investor confidence.

Insider trading occurs when a company's securities are traded on the basis of material, non-public information that could reasonably affect a person's decision about whether to trade in those securities.

Information is "material" if a reasonable investor would consider the information important when deciding to buy, sell or hold that company's securities.

Information is "non-public" until it has been disclosed and adequate time has passed for the securities markets to digest the information. Examples of material, non-public information include:

- Advance notice of changes in senior management;
- Unannounced mergers or acquisitions;
- Pending or threatened litigation;
- Non-public financial results;

- Development of a significant new product;
- An unannounced stock split.

We do not trade in securities of LafargeHolcim, any LafargeHolcim company, or any other publicly listed company on the basis of insider information obtained while working for LafargeHolcim.



Applicable LafargeHolcim Policy
 • Trading and Market Disclosure Directive

Insider trading laws not only prohibit trading in securities on the basis of inside information but also the sharing of such information with third parties.

What does this mean for me?



A heavy equipment supplier confidentially approaches you about new machinery they plan to introduce to the market. You have already decided that LafargeHolcim could not use the product, but you think it will be a real breakthrough for other industries. Once the supplier finds customers, you are sure the company's share price will increase dramatically. Are you allowed to buy securities of the supplier?

No. You are not allowed to buy any securities of the supplier until the public knows about the new product. This is "inside information" because the introduction was confidential. There has not been full and fair public disclosure. The information is "material" because a reasonable investor would probably consider the information important in making an investment decision about the company.

