



Heidelberg Materials Corporate Citizenship Policy

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Heidelberg Materials recognises its responsibility towards the communities situated in direct neighbourhood to its operations. Sustainability, human rights, and anticorruption are fundamental to our business conduct. Heidelberg Materials is committed to reducing the impact of its operations on neighbouring stakeholders and being a good neighbour towards local communities. That is why Corporate Citizenship is an active part of our approach. In the case of Heidelberg Materials, Corporate Citizenship is driven by three mechanisms: Corporate Social Responsibility activities, local Community Engagement and Corporate Volunteering.

01. Committing to being a good Neighbour

As part of our Sustainability Commitments 2030, informed by the United Nations Sustainable Development Goals (UN SDGs), we have committed to build a safe and inclusive future by 2030. Aligned with this ambition, we focus on the interaction we have with our surrounding communities and our impact on people's daily life. As our operations are local by nature and long embedded in local ecosystems for decades, we consider socio-economic effects as well as health, safety, and well-being. We are convinced that these interactions and the effects of our activities have positive social impacts, and we strive to amplify them. Transparent and collaborative community relationships are vital to ensure sustainable operations. Therefore, Heidelberg Materials strives for consistent, strategic community efforts.

This Policy sets out our social commitments and explains the guiding principles and objectives for creating sustainable value together with our communities. This Policy applies globally to Heidelberg Materials AG and all companies that Heidelberg Materials AG directly or indirectly controls. It replaces the former Community Engagement Policy as well as the former Corporate Volunteering Policy.

02. Governance and Compliance

Corporate Citizenship lies in the responsibility of the Chief Sustainability and New Technologies Officer (CSO) on Managing Board level. As a member of the Managing Board, the CSO ensures strategic alignment, oversight, and accountability for Corporate Citizenship.

At country level, the General Manager is responsible for the implementation of the Policy principles and related governance documents. The country manager is furthermore responsible for the achievement of the related targets, namely two Sustainability Commitments 2030 in the topic area "safe and inclusive". To ensure compliance, all Corporate Citizenship efforts can be part of spot checks and internal or external audits.

Heidelberg Materials manages its business, including its Corporate Citizenship activities, in accordance with internationally recognised human rights standards, relevant applicable laws and local country regulations. Further, Heidelberg Materials Corporate Citizenship activities must comply with its internal corporate guidelines and policies, including our Code of Business Conduct, Anti-Corruption Policy and Policy Statement on Human Rights. All suppliers are obliged to commit to the principles of Heidelberg Materials' Supplier Code of Conduct. Additional mandatory implications on Corporate Social Responsibility (CSR) activities, social expenses, Community Engagement and Corporate Volunteering are elaborated in this Policy as well as in corresponding Procedures.

03. Corporate Citizenship

Corporate Citizenship is the company's responsibility to operate ethically, contribute positively to society, and minimise its negative impact on people and the environment. Hence, it is contributing to building community trust and acceptance. Since Heidelberg Materials' operations are naturally local, and often deeply integrated in local social and commercial ecosystems for decades, the company focusses on the interaction with its surrounding communities and local suppliers, its impact on people's daily life, socioeconomic environment, health, safety, and well-being.

At Heidelberg Materials, active Corporate Citizenship is driven by three major levers: CSR activities, local Community Engagement and Corporate Volunteering. While each country organisation shall have a joint strategy and target setting on social matters, on site level, the weighting of the three levers depends on local conditions.

04. Corporate Social Responsibility Activities

Within Heidelberg Materials, CSR is understood as the active contribution to the community close to our business in the form of monetary or in-kind donations,

sponsoring and strategic partnerships as well as projects with e.g., non-governmental organisations (NGOs), educational institutions or non-profits. All CSR activities must fall into one of Heidelberg Materials' four Corporate Citizenship thematic focus areas: education, culture, infrastructure and environment. The thematic focus areas serve to achieve a targeted joint social impact tied to UN SDGs.

Processes to manage CSR need to be properly formalised; potential risks related to compliance and corruption must be eliminated. Social expenses linked to CSR are defined as CSR Spend. CSR Spend must be incorporated in the annual budget planning processes. The choice of CSR activities and initiatives supported, as well as the reporting of CSR spend, must be executed in line with the Group CSR Governance Procedure as well as the ESG Reporting Procedure for CSR Spend.

05. Community Engagement

Since maintaining a mutually beneficial relationship is of paramount importance for the sustainability of our operations, we require that local stakeholder engagement is implemented at country regularly, regional and site levels to share information. Identifying and interacting with stakeholders on local level is crucial to consider potential concerns and opportunities, to understand municipal needs and to empower neighbouring communities. The potential topics of interest range from economic and governmental aspects (incl. infrastructure and employment) to environmental (incl. biodiversity, water and land use, see also Nature Policy) and social aspects (incl. health and safety).

Engagement with identified key stakeholders needs to take place regularly, at least once a year. The community relationship is regularly monitored, based on a mid to long-term vision, to ensure that actions are efficiently implemented and corrective measures are taken, if needed. To reflect our due diligence obligations, local Community Engagement shall address community concerns related to our operational impacts, such as dust, noise, vibrations, traffic, or other topics affecting neighbouring residents. To ensure this, at least all priority sites must develop and implement a Community Engagement Plan by 2030, which is further specified in the Group Community Engagement Procedure. Local Community Engagement and Community Engagement Plans shall include structured processes for stakeholder analysis and dialogue, grievance handling, mitigation of adverse impacts, as well as appropriate CSR activities and Corporate Volunteering.

06. Corporate Volunteering

The third lever of Corporate Citizenship is Corporate Volunteering. In Heidelberg Materials' context, Corporate Volunteering is defined as employees voluntarily taking part in social activities that support their local communities, with the company's support. Heidelberg Materials believes that a holistic approach to Corporate Volunteering strengthens not only the company but also the broader social ecosystem of which it is part of. To support the Sustainability Commitments 2030, each country organisation shall ensure that one volunteering day per year is enabled by 2030 at the latest. In accordance with the local management there may be extended beyond the one day where appropriate.

Employees must adhere to Heidelberg Materials' core principles and policies when selecting the Corporate Volunteering activities. All Volunteering activities shall be in scope of the four Corporate Citizenship thematic focus areas: education, culture, infrastructure and environment – contributing to the same UN SDGs as the company's CSR activities. Local processes to track Corporate Volunteering need to be properly formalised; potential risks related to compliance and safety must be eliminated; as indicated in the Group Corporate Volunteering Procedure.

