

ACC LIMITED

Building on Integrity Our Code of Business Conduct

Approved by the ACC Board at its meeting held on 03 February, 2017

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- We act with integrity at all times; we are honest and trustworthy;
- We demonstrate respect for our fellow employees, customers and business partners; we listen and seek solutions;
- We are open-minded team players; we foster collaboration while maintaining individual accountability;
- We value new ideas that serve our customers, the business and communities;
- We are dedicated, committed and deliver on our promises;
- We obey the law and comply with this Code.

Message from the CEO

Creating trust and fostering sustainable relationships based on integrity is fundamental to our continued success in today's challenging business environment. Our credibility largely depends on all of us working together to build a sustainable future based on trust, fairness and honesty.

ACC is a vibrant company with a rich heritage, a nationwide presence and a truly diverse workforce. Counted among India's trusted brands, this company has demonstrated an unwavering commitment to maintain high ethical standards in all its interactions. With a truly diverse workforce that continues to evolve and develop, it becomes important for the organization to ensure that the right behaviours are inculcated in the workforce so that employees act with integrity at all times in interactions with each other and with all stakeholders, while pursuing the highest standards of excellence in all business practices.

Keeping this in mind, we have updated ACC's Code of Business Conduct (termed as our "**Code**") setting out the principles by which we conduct business. The Code is firmly anchored in our values: **CRISP** – Focus on Customers, Deliver Results, Act with Integrity, Ensure Sustainability, Care for and respect People, Openness & Inclusion.

We are committed to foster an open work culture where people feel comfortable about seeking advice and speaking up. Anyone who comes forward in good faith to raise concerns will be encouraged to speak in confidentiality without fear.

Being part of the LafargeHolcim Group, makes it our joint and shared responsibility to preserve and enhance the reputation of both ACC and the worldwide Group. Hence acting in the best interest of the company should always be the foremost guiding principle.

In deciding what course of action is in the best interest of the company, let us pledge to **always act with integrity, be honest, follow the law and comply with this Code**. I count on your support to do this.

Best regards,


Neeraj Akhoury
Managing Director & CEO

Excerpts from the LafargeHolcim Code of Business Conduct



Acting with integrity and living the right behaviours is critical to fulfilling our role as a good corporate citizen in the communities we operate in and supporting their healthy development.

Integrity is therefore one of the core values we have defined as a building block for our new corporate culture that describes who we are, what we do and how we behave. As an organization we believe that integrity is consistent with organizational success. This Code is the embodiment of what integrity means to us in practice. It means always acting with honesty, fairness and transparency. It means respecting one another. It means respecting the communities and the environment in which we operate and respecting the people whose lives we affect.

Eric Olsen

Deputy Chairman ACC Limited & CEO LafargeHolcim Limited

1. Introduction

Our Code offers guidance and provides examples to help you when you are confronted with challenging situations in your daily work (**see enclosed Q&A as Appendix 1 to the Code**). It also contains references to ACC policies, relevant laws and regulations because these provide the background for many of the topics included in our Code and our compliance program. ACC continuously works to update and develop new corporate policies that will provide further guidance, hence please check ACC Accelerate portal.

Important to note: If adherence to the Code is incompatible with applicable state or local law, then you should abide by the provisions of applicable law, and inform your local Compliance Officer.

1.1 Acting with integrity

ACC strives to create an environment where honesty and accountability flourish and compliance is a central focus. Using common sense and good judgment together with our Code and ACC's policies and directives will usually be sufficient to ensure business is conducted with integrity. Our Code cannot anticipate every situation we might encounter in the workplace, but it will help us to make sound and ethical decisions. We expect our employees to have the courage to take the right decisions based on our ethical principles and to uphold them, even when under pressure.

1.2 Everyone, everywhere

Every employee, director and officer ("employees") of ACC and its subsidiary companies ("ACC" or "company"), must follow this Code at all times when representing or working for ACC or on behalf of the LafargeHolcim Group. Even where specific reference is made to ACC, the same principles and guidance applies whether employees are working at ACC premises or at another LafargeHolcim Group location. All persons, including service providers and business partners, will be required to act consistently with our Code when acting on our behalf or in our name.

1.3 Education and training

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 compliance with the Code a practice as part of your daily work.

1.4 Higher standards for supervisors

Supervisors at all levels have additional responsibilities under our Code which include creating an open environment in which employees feel comfortable to ask questions, raise concerns and report misconduct. Leaders with behavioral integrity are valued and promoted in the organization. Supervisors are expected to:

- Lead by example – in other words, show by their behavior what it means to act with integrity;
- Communicate with those who report to them to ensure employees understand the requirements of our Code and have the resources to meet them;
- Support employees who, in good faith, raise questions or concerns;
- Enforce the Code consistently.

1.5 Violation of our Code

We must all adhere to our Code. Violations of our Code, our policies, directives or the law can have serious consequences, including disciplinary action up to and including termination of employment, as well as possible civil or criminal penalties both for the company and for individuals.

Before you act, always ask yourself, could my conduct

- Be viewed as dishonest, unethical or unlawful?
- Damage ACC or their reputation if it became public?
- Cause ACC or the LafargeHolcim Group to lose credibility with their customers, shareholders or communities?
- Hurt other people, such as other colleagues, customers or shareholders?

If the answer to any of these questions is “YES” or even “MAYBE”, you have identified a potential issue and should seek guidance from amongst the many resources available to you, such as your supervisor, Human Resources, Legal, Internal Auditor, Internal Security as well as your Compliance Officer.

1.6 Annual Confirmation

All ACC directors and senior management shall give annual confirmation to the Secretarial Department that they have complied with this Code.

1.7 Outsider's Recourse

No outsiders will have any right or recourse to any action or claim of whatsoever nature against any of ACC's directors or employees for the non-compliance of this Code.

1.8 Customers

ACC is committed to supply goods of quality standards consistent with the requirements of its customers striving for their total satisfaction. The Company expects all its employees to be customer-focused in their approach.

1.9 Corporate Communications

The Company commits itself to open, transparent, impartial and timely information to its shareholders, employees and other stakeholders.

All communications to the financial analyst community and all inquiries from the press shall be handled only by the (Corporate Communications Department or by a person authorised by the Managing Director & Chief Executive Officer).

2. Integrity in the workplace

2.1 Health and Safety (H&S)

At ACC we aim to create a healthy and safe environment for our employees, contractors, customers and stakeholders. Nobody should get injured while working with or for us. Our goal is zero harm to people. To achieve this we need the commitment of everyone.

Through our performance management processes we ensure that every employee understands what she or he is accountable for, and what support they can rely on to achieve success. We provide a safe and healthy work environment and also work with employees and contractors to develop a culture that encourages both personal and collective responsibility for H&S.

We integrate H&S into all business processes and encourage a culture where concerns are raised and solved within the business unit and with the support of the H&S function.

Health and Safety is an overarching value for LafargeHolcim and this means that every single employee and contractor who comes into contact with LafargeHolcim must know what to do to prevent a serious injury or fatality.

The Health and Safety Rules:

Rule 1 I assess and control risks before starting any task.

Rule 2 I only perform activities for which I am authorized.

Rule 3 I never override or misuse health and safety devices, and I always use the required PPE.

Rule 4 I do not work under the influence of alcohol or drugs.

Rule 5 I report all incidents.

Living by these rules is a condition of employment.

2.2 Diversity, fairness and respect

We believe we have a responsibility to treat each other with dignity, which means appreciating diversity, whether that diversity exists because of race, religion, gender, sexual orientation or any other difference. Differences bring to light different perspectives of the world, which enhance ACC's perspective of the world and enable us to be the best we can be. Thus, we value and promote a workplace that is inclusive and fair and which fosters respect for all of our fellow employees, customers and business partners. We all strive to create an environment in which personal dignity, privacy, freedom of association and collective bargaining, and personal rights and safety of every individual are part of our everyday work experience.

All employees without regard to job title or level will be treated fairly in matters affecting hiring, training, promotion, compensation and termination.

2.2.1 No threats or acts of violence

To keep our work environment free from violence, abusive behavior or intimidation, all employees should demonstrate courtesy and respect not only on ACC property, but also when conducting ACC business – whether it’s during a customer meeting, driving an ACC vehicle or interacting with the local community. Always act professionally.

2.2.2 Discrimination and Equal Opportunities Employer

ACC provides equal opportunities to all its employees. We work together with individuals of various ethnic backgrounds, caste, cultures, religions, ages, disabilities, medical conditions, races, marital status, sexual identities, world-views, gender and affiliation to political organizations, unions or minority groups. Consistent with our respect for each other and with the employment laws of numerous countries in which we may be working, we do not tolerate discrimination against anyone on the basis of any of these characteristics or any other comparably offensive behavior. These principles extend to all employment decisions including recruiting, training, evaluation, promotion and reward.

2.2.3 Harassment

“Harassment” is a form of discrimination that consists of unwelcome behavior that has the purpose or effect of creating an intimidating, hostile or offensive work environment. Harassment can come in many forms, including physical actions, verbal or written remarks, or visual depictions. Sexual harassment is evidenced by unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature that tends to create a hostile or offensive work environment. ACC strictly prohibits any acts of harassment, whether done by an employee or a non-employee.

2.3 Protection of our company assets

All employees are responsible for protecting our company’s assets and using good judgment to ensure that physical and intellectual properties as well as financial assets are not damaged, stolen, misused or wasted.

2.3.1 Protecting proprietary assets

ACC regularly produces valuable, non-public ideas, strategies and other kinds of business information, which we own and need to protect as intellectual property. Such information is a large part of what gives us our competitive advantage. Improper disclosure of confidential information is prohibited. We must be mindful of the risks of improper disclosure of confidential information.

2.3.2 Protecting physical assets

ACC’s physical assets, such as equipment, materials and facilities, are instrumental to performing our day-to-day jobs. These assets have been accumulated through the hard work of people. By working for ACC, each of us should assume responsibility for these assets and must safeguard them from theft, loss, misuse, and waste. In addition, we must make sure that all resources are used for appropriate business purposes.

2.3.3 Employee and third-party confidential information

Employee data must be gathered and maintained according to applicable legal requirements. Access to prospective, current or former employee records and personal data, including performance evaluations, salary, pension and benefits, is only permitted to persons with proper authority in accordance with data privacy laws. In addition, we are responsible for protecting confidential information entrusted to us by our customers, suppliers and other business partners as carefully as we protect our own information.

The Company reserves the right to, at its own discretion, disclose or transfer any data or communication (including Sensitive Personal Data or Information –“SPDI”) related to any director, officer or employee of the Company (or any other person), available either on the physical or electronic records, servers or computer resources maintained by the Company or which data or communication the Company may be provided with or has acquired or come into possession of, either to an entity within the LafargeHolcim Group or to a third party. All persons (including directors, officers or employees of the Company) falling within the scope of the EthicalView Policy hereby consent to the disclosure and / or transfer of such data or communication by the Company.

In the ordinary course of business, information is acquired about other companies, including customers, suppliers and competitors. There are, however, legal and ethical limits on acquiring competitive information.

- We should not acquire information through improper means, such as through bribery or spying on our competitors;
- We should generally not request or obtain competitive information from non-public sources. Consult your Compliance Officer to clarify what the term non-public means in a particular situation if you have any doubts;
- We should not hire an employee of a competitor to get confidential information or encourage employees of competitors to disclose confidential information about their employer;
- We should not accept information offered about a competitor that may be confidential. You should ask if it is confidential, how it was obtained and if the material being offered carries a classification such as “secret,” “confidential,” “proprietary” or “for your eyes only”.

2.4 Information systems, e-mail and social media

Technology in the work place enables us to serve our customers ever more efficiently. We rely on it to support our processes and interactions around the globe.

Internet access, e-mail and other applications are provided for business purposes. All business communication and collaboration internally with other ACC employees and external third parties must be done using company approved electronic communications and e-mail accounts. In sending and receiving e-mail communications and attachments you must apply the same standards of care as used in hard-copy communications.

It is prohibited to disclose externally (including to press, investors or otherwise) or post to social media sites, internal ACC information or communications without authorization.

You must not abuse ACC IT systems, internet access, e-mail accounts or any other information and communication media for illegal or unethical purposes. Searching, downloading or forwarding information that is abusive or offensive may lead to disciplinary measures. You must also be aware that you are not allowed to use or copy software or data from ACC IT systems for private purposes or install private software at your workplace or on any company device unless explicitly authorized by the IT department to do so.

Social media allows us to communicate instantly and widely. Think carefully before disseminating images or text involving your work colleagues or work place. Unforeseen consequences could include damage to the reputations of individuals or the company at large.

3. Integrity in business practices

3.1 Anti-bribery and anti-corruption

ACC sells products and services based on quality, reliability and many other things, but never bribes. We know that paying bribes is never good business, definitely not sustainable business, and that bribery in any form does not fit with the ACC culture of integrity. Abiding by the rule of law and setting an example on how to conduct ethical business is one way for us to put this commitment into action.

International anti-corruption laws apply to all of LafargeHolcim's operations around the globe and national anti-corruption laws apply to ACC. It is never acceptable to offer, give, authorize, attempt to procure or procure any form of bribe, kickback or favour, including to or from any public official or private person. We also do not hire third parties to do things we are not allowed to do ourselves, like paying bribes. Third parties acting on our behalf must therefore never give or receive bribes.

The term 'third parties' can include consultants, subcontractors, franchisees, sales agents, resellers, customs brokers, accounting or law firms, companies that provide assistance with obtaining visas, permits or inspection certificates and joint venture partners. Regardless of the type of third party, it is critical that all third parties who conduct business or provide services for or on behalf of ACC are selected and engaged in compliance with the required Third Party Due Diligence Procedures.

3.1.1 Facilitation payments

Sometimes payments to government officials are called "facilitation payments" if they are small payments made to obtain routine government services to which the person paying is legally entitled. ACC prohibits its employees from making such payments. The only exception to this rule would be when an employee believes his or her life, personal security or health is in imminent danger and feels bound to make a payment. In the event that an employee makes such a payment under threat to their personal security or health, all relevant details must be reported to local Compliance Officer at the earliest opportunity, and the payment must be accurately recorded in ACC's books and records.

3.2 Gifts and hospitality

Good business relationships are built on trust and goodwill, and because we value and respect our customers and business partners, either party may want to acknowledge this from time to time by offering gifts and hospitality. By exercising common sense, discretion and sound judgment, before offering or receiving any gifts or hospitality, we can avoid good intentions being misinterpreted. Gifts and hospitality must always be moderate and should never be used to exert improper influence.

A basic guideline: Ask yourself if the gift or hospitality is illegal or whether it breaches either ACC's or the other party's policies or directives. Then ask yourself whether you would feel embarrassed or put the company in an awkward position if the gift or hospitality were published on the front page of the newspaper. If the answer to any of those questions is "yes", then the gift or hospitality must not be given or accepted.

With regard to gifts or hospitality to public officials, you should always be cautious. Public officials are widely defined and cover any person exercising a public function for a given country (civil servants), which can include employees of a public agency or state-owned enterprise. Some governments and government institutions have particular rules with regard to giving gifts and hospitality to its public officials that may in fact be stricter than what is allowed by ACC's policies and directives. If you are planning to offer a gift or hospitality to a public official and are unsure, refer to your local gifts and hospitality policy or Compliance Officer.

You may not use your own money or resources to circumvent the rules in our policies or as set out in this Code. All gifts and hospitality offered and provided to others on behalf of ACC must be properly reflected in ACC's books and records.

3.2.1 Hospitality

Hospitality includes meals and refreshments, as well as cultural or sporting events where at least one ACC employee acts as host and attends. If no ACC employee is attending then the hospitality is a "gift" and subject to the rules on gifts.

3.2.2 Gifts

Gifts can include goods or services as well as other things of value, for example loans, school fees, medical care expenses, and trips or tickets to cultural or sporting events.

Cash gifts or their equivalent (such as gift vouchers) and tips are not permitted, with very limited exceptions that have been pre approved by Group Compliance.

3.2.3 Returning a gift

If a gift exceeds the standards set out in the ACC policies or directives, tell your supervisor and you should politely return the gift explaining that ACC's internal rules do not permit the acceptance of such gifts. If returning a gift is really impractical or would cause such offence to the giver, it must be donated anonymously to charity, and if this is not possible, then accept it on behalf of the company and share it amongst the employees or consult with Human Resources department or Compliance Officer for deciding on how this should be carried out.

3.3 Fair competition

ACC believes in free markets and fair competition because this ensures our customers obtain the best products and services on the most favorable terms. Violations of antitrust and competition laws are never in ACC's interest and are not tolerated. In all regions and countries where we do business, we are committed to competing vigorously but fairly for suppliers and customers.

Our employees must never directly or indirectly:

- Enter into agreements, understandings or coordinate activities with actual or potential competitors to:
 - Fix prices, premiums or any specific elements thereof;
 - Limit or restrict the kind or quantity of products or services supplied;
 - Allocate markets geographically or according to trading partners, customer segments or product lines;
 - Engage in any communications with competitors about bids;
 - Set the terms or outcome of a bidding process;
 - Boycott suppliers or customers as a means to prevent the supplier or customer from dealing with a competitor.
- Abuse its position in a particular market.
- Enter into agreements or arrangements with entities operating at different levels of the production or distribution chain, such as suppliers, distributors or retailers, which lessen or eliminate free and fair competition;
- Engage in any other behavior that would otherwise limit competition in breach of applicable laws and regulations.
- Exchange competitively sensitive information.

There are many forms of conduct that may be subject to antitrust laws. You must abide by these laws as well as ACC's internal policies and seek guidance from your Compliance Officer if you have any questions or concerns. The rules and laws on antitrust are complex and numerous: It is better to be cautious and ask questions rather than assuming an action will be acceptable - poor judgment is no excuse.

3.4 Accurate recording and reporting

In all our dealings and in every form of communication we are accurate and truthful. This is the basis of how we deal with each other, and is similarly expected of us in all our relationships with investors, customers, employees and business partners, as well as with the public and all government offices.

Timely, complete and honest recording of financial and non-financial information and the proper retention of our documents and records is essential to our business, and is important for our:

- Credibility and reputation;
- Legal and regulatory obligations;
- Ability to make accurate projections and business decisions;
- Responsibility to shareholders and other external stakeholders.

Falsification or improper alterations of records is prohibited. You must never instruct someone else to prepare or approve a false or misleading record or do so yourself at the direction of another person. When preparing records we must all act with integrity so that information is not incorrectly withheld, incomplete or misleading. Discrepancies in any records must be resolved with appropriate corrections and made transparent to persons who need to know of any such corrections.

3.4.1 Record retention

Company records must be retained according to applicable laws as well as ACC policies and guidelines. The destruction, concealment or alteration of any record that you have been instructed to keep is prohibited. If you know, or believe there is a possibility of any litigation, internal or external investigation involving any record in your possession or under your control, you must retain that record and produce it promptly when instructed to do so.

3.5 Conflicts of interest

We are all required to make business decisions in the best interests of ACC and 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 or keeping in mind the interests of the Company.

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 ACC. When such relationships or activities cannot be avoided, you must disclose promptly to your 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 is in your interest. Transparency often removes any perception of improper activity.

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

3.5.1 Outside engagements

You may be invited to serve as a director, consultant or as a member of the 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 ACC. Further, if this organization is a competitor, conducts business with ACC or with LafargeHolcim, or is a public or state-owned company or has its main business as manufacturing cement, you will need to obtain prior approval from your supervisor or the CEO (or the Board of Directors, as the case may be) or the Compliance Officer.

3.6 Insider trading

ACC supports open and fair securities markets because it is the key to building trust and investor confidence.

Insider trading occurs when a company's securities are traded on the basis of material, price-sensitive 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:

- Declaration of financial results (Quarterly, Half Yearly & Annual);
- Declaration of Dividend (Interim and Final);
- Change in capital structure including but not limited to issue of securities by way of public/rights/bonus/split and buy back of securities
- Announcement of any major expansion plans or execution of new projects; Development of a significant new product;
- Un announced Mergers, Demergers, Acquisitions and Delisting;
- Disposal of whole or substantially the whole of the undertaking. Major Expansion of the Business
- Advance notice of changes in senior management;
- Pending or threatened litigation;
- Material events in accordance with the Listing Regulations;

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

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.

3.7 Conducting international business

ACC is sometimes represented in markets outside of its national market and therefore operates subject to the laws and regulations of different legal systems.

3.7.1 Sanctions and embargoes

We deliver our products, services and technology across the globe. Thus, we are committed to complying with all applicable export and import laws, including trade sanctions, embargoes, and other laws, regulations, and government orders or policies that affect trade. Whether a product, service, or technology can be exported from one country to another depends on many factors including the nature of the item, its country of origin, its end use and end user.

Sanctions and embargoes restrict transactions with certain countries, named individuals and entities, and for certain end-uses. We must therefore be aware of these restrictions and obtain all documentation as may be required before engaging in a transaction or exporting our goods.

3.8 Preventing money laundering

It is our objective to do business with reputable business partners who conduct lawful business activities and whose funds come from legitimate sources.

Money laundering is a crime involving disguising the source of money connected with criminal activity, such as terrorism, drug trafficking or bribery. The crime occurs when criminally derived money is integrated into the stream of commerce so that it appears legitimate or its true source or owner cannot be identified.

In order to prevent ACC / LafargeHolcim from being used as a means to launder money, our employees follow all accounting, record keeping and financial reporting requirements applicable to cash payments and other forms of payments in connection with our business transactions.

As ACC employees, we are vigilant with regard to detecting payment irregularities and suspicious behavior of customers and others. If you have suspicions or questions about a proposed transaction, raise questions with your supervisor or Compliance officer.

4. Integrity in the community

4.1 Environment

As responsible citizens we are all aware of our continuing obligations towards the environment, and the need for active engagement to protect and preserve our natural resources. ACC is committed to protecting the environment where it conducts business and to that end have developed policies with a strong focus on:

- Greenhouse gas emissions;
- Energy and water conservation;
- Reducing and properly disposing of waste in the manufacturing process; sustainable valorization, recycling and re-use of waste in the production process;
- Use of sustainable raw materials and practices; quarry rehabilitation / restoration and biodiversity management;
- Compliance with environmental laws and third party requirements; and
- Monitoring and reporting environmental compliance and performance.

ACC is also subject to many government requirements and environmental laws that set minimum standards. At ACC, we strive for a higher standard of conduct. We regularly audit performance in these areas and develop action plans to continuously improve our performance.

We encourage you to support the sustainable use of natural resources including water conservation, the reduction and beneficial re-use of waste, energy conservation and biodiversity management. Please consult your Environmental Coordinator to learn more about how you can support ACC and ensure we meet our objectives.

4.2 Human rights

We are committed to respecting and protecting human rights wherever we conduct business. 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 labor;
- Physical punishment;
- Violence towards employees, specifically when based on gender, origin, religion or sexual orientation;
- Forced or compulsory labor;
- Unlawful discrimination in employment and hiring practices;
- Provision of unsafe working conditions;
- Salary payments (or deductions) that illegally leave the worker below minimum wage;
- Illegal overtime regulations.

Our commitment to human rights is embedded in our Corporate Social Responsibility (CSR) Policy and reinforced by the LafargeHolcim Group's participation in the UN Global Compact. ACC's Human Rights Management System applies to all our stakeholders and is mandatory. This system looks at our own "behavior" as well as at the value chain, in particular the supply side and third party service contractors.

If you have reason to think that ACC or LafargeHolcim or one of our partners is failing to abide by laws or regulations designed to protect human rights, share your concerns with your Compliance Officer.

4.3 Community engagement

ACC makes all efforts to be a trusted corporate citizen and to fulfill its responsibilities to the communities in which it operates. We seek to do this by contributing through investment and engagement, and building relationships based on mutual respect and trust with all our stakeholders in these communities.

We demonstrate respect for people and the planet and ask all our employees to consider the short and long-term impacts on the community and the environment when they make business decisions.

4.3.1 Political contributions

ACC as a company is politically neutral. Contributions to political parties, politicians or candidates for office are private matters for our employees.

ACC premises and assets may never be used to raise funds or to campaign for particular political party or candidate for office. Political donations may not be made in the name of ACC unless expressly permitted under written local laws and applicable policies and guidelines which must require transparent and accurate documentation of such contributions and prohibit such donations to be given in exchange for an improper benefit.

5. Advice, guidance and reporting

Whilst working with ACC if you come across instances of ethical dilemma such as fraud, conflict of interest, misconduct or violation of our Code then do not hesitate to speak up, ask questions about your responsibilities to your immediate supervisor or others who can help such as Human Resources, Legal, Internal Audit, Internal control and your Compliance Officer, and report concerns or non-compliant conduct in good faith when needed. In this context “good faith” means that you:

- (i) provide all of the information you have;
- (ii) reasonably believe that the allegations are substantially true; and
- (iii) are not acting for personal gain.

It is not relevant whether, following an investigation, the reported concern or misconduct is found to be valid and substantiated or not.

Integrity Line (<https://integrity.lafargeholcim.com/>)

If you are uncomfortable or unsuccessful in discussing an issue with one of the choices set out above, you should be aware that the LafargeHolcim Integrity Line is another alternative to obtain advice or raise a concern in good faith about any situation that you know or suspect violates our Code or the law.

Please ensure that all such concerns or reports of violation are raised in a confidential manner and are made through the ACC EthicalView reporting system. EthicalView is independently operated by a specialized third party service provider and gives you the choice between the following reporting options:

- An online reporting service available 24 hours a day, seven days a week that can be accessed at <https://integrity.lafargeholcim.com> & a voice message can be sent to Toll Free Number: **0008000410035 (calls from mobile phones only)**;
- Making a call to the toll-free number **1800 209 2008**;
- Sending an email to acc@ethicalview.com;
- Sending a letter to **PO Box 137, Pune 411001** or directly to the Chairman of the ACC Audit Committee at ACC's registered office;
- Sending a fax to **+91 (22) 6645 9575**.

While anonymous reporting is permissible ACC strongly encourages you to disclose your identity and to state your name and a phone number or email address. Sharing one's identity when making a report will help ACC conduct the most thorough investigation possible. Regardless of how you choose to report, all reports of actual or suspected misconduct will be taken seriously and read by a team of independent compliance and investigation experts, who will deal with your report in a professional manner. Reports and related information will be treated confidentially and shared with only those persons who have a need-to-know and in relation to safeguarding the interests of ACC.

Co-operation with Investigations, audits, and internal control activities

Any potential violation of the Code or the law is taken very seriously at ACC and will be investigated promptly. Employees are therefore required to cooperate fully and honestly in any investigation, audit or internal control activity of alleged illegal or unethical activity. Subjects of a

report have a responsibility not to interfere with the investigation. All documents, including but not limited to hard copy, electronic and email files, are the property of the company and may be reviewed from time to time in compliance with applicable data privacy law and in accordance with ACC policies and directives for purposes of investigations, audits or internal control activities or ensuring compliance with law. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the subjects.

Protection from retaliation

ACC does not tolerate retaliation against any employee who reports a concern in good faith. Individuals who take action against a person for making a report or participating in an investigation will be subject to disciplinary action, up to and including termination of employment. Likewise, any employees abusing the EthicalView reporting system by knowingly reporting frivolous information affecting other employees will face disciplinary consequences.

The ACC EthicalView Committee will monitor and implement the EthicalView Policy and the underlying processes.

Appendix 1 – FAQs about the Code of Business Conduct

Violation of our Code

What does this mean for me?

Q: The ACC sales and commercial team has worked long hours for months in the hopes of winning a large volume supply contract with a construction company. The week before the tender is to be awarded; the CFO receives a call from a lawyer who tells her that he can guarantee ACC wins the bid if ACC employs an associate who has good contacts at the construction company. As winning this project is in the best interest of ACC, the CFO feels tempted to take the offer. What should she do?

A: The situation raises a red flag. While winning a deal is in the best interest of ACC, it is not in its best interest if it comes at the expense of breaching the law or harming ACC's reputation. She should not proceed in the matter.

Health and Safety (H&S)

What does this mean for me?

Q: When arriving at your workstation you realize that a colleague is not using the proper tools for a task. What should you do?

A: No one is allowed to override or interfere with any safety provision (which includes risk assessments and using appropriate tools). You should therefore raise your concern with your colleague and ask if he needs your help to ensure the task is performed safely.

Q: You arrive early at work one morning and see a colleague swallowing several pills together with a canned drink. Upon greeting your colleague in the cloakroom you notice a slight smell of alcohol on his breath. When you ask if he has had an alcoholic drink, he tells you that he has not, and that it is just a mouthwash. What should you do?

A: In order to make sure everyone is safe in the workplace it is important that you raise your concern about your colleague with your supervisor or Human Resources. Your colleague may have a problem that he needs help with, and working whilst under the influence of alcohol or drugs can impair the safety of not just himself but others too.

Q: You are aware of a H&S related incident in your organization and suspect that it has not been reported according to the rules. What should you do?

A: Ensure your supervisor is aware of the incident and confirm with her that the issue has been reported. If you are uncomfortable speaking directly with your supervisor about the issue, speak with your local H&S support, your local compliance officer, or one of the many other local resources at your disposal. If these avenues do not seem possible, this would be a good time to use the Integrity Line.

Diversity, fairness and respect

What does this mean for me?

Q: You are searching for a candidate to hire as a sales manager for the sales department. You believe that sales business is “male business” and ask yourself if you can consider only male applicants for the sales manager position.

A: You are not permitted to search only for male applicants nor may you reject the applications of women simply on the basis of sex; this would be discrimination on the basis of gender. Your search must be focused on the qualifications, skills and experiences of the candidates and how they meet the essential functions of the position.

Q: One of your colleagues regularly opens a joke website and tells his neighbor at the next desk the joke of the day. Everyone in the office can hear the jokes and the comments they provoke. Sometimes these jokes contain references that some people find funny, but others find them to be of questionable taste or offensive. Jokes that make fun of people’s sexual orientation appear particularly upsetting to one individual. What should you do?

A: You should speak to your colleague and point out that even if he finds the jokes funny not everyone else in the office does and that some of them are offensive. If he doesn’t stop making the remarks, you should raise the matter with your supervisor or Human Resources.

Q: During the course of a plant visit, you notice a wall calendar exposing female nudity. Although you do not like it, you do not want to react as; after all, there are no female co-workers in that particular area of the plant.

A: You should speak up. The display of pictures or drawings of a sexual nature in any LafargeHolcim workplace is considered visual harassment and explicitly prohibited. You should communicate your findings to the supervisor or plant manager so that the calendar is removed.

Protection of our company assets

What does this mean for me?

Q: During my commute to the office on the train, I sometimes make work-related calls. Is this a problem?

A: You must be careful not to discuss non-public company information in public places, such as in taxis, trains, elevators or at conferences and trade shows. When it is necessary to conduct a telephone call in a public place, be mindful of your surroundings.

Q: What should you do if a competitor by mistake sends you an e-mail with a confidential document attached to it, as a result of mixing up your name with someone else’s?

A: If you realize it is an error and you know the attachment is confidential, do not open it, forward it, print it out or share it. If you have opened the document, close it, do not act upon the information, and contact your Compliance Officer immediately. In any event, do not delete the mail before speaking to your Compliance Officer.

Information systems, e-mail and social media

What does this mean for me?

Q: You put a copy of a Microsoft Word installer file on a USB stick and plan to install it on your home computer. You feel that ACC would not be harmed because the original file remains on its systems. Can you proceed?

A: No. When ACC acquires software it is usually bound by a license agreement with the software company. Using the software for private purposes will most likely infringe such license agreements and ACC could be liable for your unauthorized use.

Anti-bribery and anti-corruption

What does this mean for me?

Q: You plan a new cement production plant for ACC. During the negotiations with the local authorities the governor of the province informs you that a new clinic is needed in the town nearest to where the plant is to be built. She makes it clear that ACC's support in building a new clinic will not only help expedite ACC's permission to set up its new cement plant, but will also support her re-election plans. What should you do?

A: This request could be a breach of applicable anti-corruption laws. You should contact your Compliance Officer and supervisor about this situation and be guided accordingly.

Q: A third party tells you that he 'knows all the right people' and that he can speed up the signing of a new contract if he is given an advance on his fee. He tells you it is needed for travel expenses but you're not quite sure what travel would be involved. What should you do?

A: Payments to third parties must be against an invoice that itemizes services actually rendered in sufficient detail that you are satisfied that they are genuine and reasonable. Paying a third party in advance at his request should make you ask why and be very cautious about accepting an explanation without further checking. You should also review the due diligence and reputation of the third party.

Bribes can take many forms, not only cash payments, but also valuable favors such as provision of travel, school fees, charitable donations and other forms of advantages.

Fair competition

What does this mean for me?

Q: A representative of another cement company called me and invited me to a meeting in another country to discuss "rationalizing" the market for a product we both supply. The "rationalizing" meeting is taking place outside of the country where the "rationalizing" would take place. Should I join the meeting?

A: No. You must immediately contact your Legal Counsel / Compliance Officer. Attending a "rationalizing" meeting could be extremely serious criminal conduct. Don't be fooled by coded

words like “rationalizing”. Having the meeting in another country would not change the result as this meeting can still break the applicable antitrust laws.

Q: A competitor approaches an ACC Commercial Director and suggests maintaining prices for the next twelve months. The company is under pressure to meet its EBITDA target and the manager contemplates taking the competitor up on his offer. Should she take the chance?

A: Acting in breach of competition law is never in the best interest of ACC. Acting with integrity requires you to abide by the law as well as the ACC policies and directives, even if the chances of being discovered are small and at first sight the opportunity to meet the business target appears increased.

Accurate recording and reporting

What does this mean for me?

Q: It is the last week in the quarterly reporting period. Your supervisor wants to make sure that your team meets the numbers for the quarter, so she asks you to record an unconfirmed product sale now, even if the sale will not be finalized until next week. You think this will not hurt anyone in the company. Can you follow the request?

A: No. Costs and revenues must be recorded in the correct time period. The sale is not yet complete. It would be a misrepresentation and could amount to fraud if you include it in an earlier period.

Q: You have just been appointed as a financial controller in a country and you have discovered that the physical stock of clinker is much lower than in the books. The potential loss is huge. You talked to the CEO who replies that he cannot afford any provision this year as he is already behind his targets. He remarks that the loss should be spread out over the coming years. Is this okay with you?

A: No, in spite of your supervisor’s answer, you have the responsibility to ensure that the reporting is full, fair, accurate, and timely. If you were to follow this instruction, you would be falsifying documentation.

Conflicts of interest

What does this mean for me?

Q: A technical equipment supplier of ACC 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 think about not having the defect remedied.

A: Your decision-making should not be influenced by the personal relationship to the supplier. It is your duty to act in ACC’s best interests. You should also report the conflict and inform Compliance Officer about the fact that you have a personal relationship with the owner of the supplier.

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

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

- The position you hold in ACC;
- The influence you have in the selection of ACC suppliers;
- The amount of your investment and relative shareholding;
- The importance of ACC 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.

Insider Trading

What does this mean for me?

Q: A heavy equipment supplier confidentially approached you about new machinery they plan to introduce in the market. You have already decided that you 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?

A: 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.

Conducting international business

What does this mean for me?

Q: You are asked by a customer to deliver cement to an unfamiliar company located in a neighboring country. This country is subject to sanctions imposed by the UN. You do not know if you can, or should, accommodate the customer's request. What should you do?

A: You should ask your Compliance Officer on guidelines to handle the request. The ability to ship will depend on many factors, including the country the customer wishes you to ship the consignment to, the product being exported, how the product will be used and by whom.

Gifts and hospitality

What does this mean for me?

Q: While negotiating prices with one of our suppliers they offered me a ticket for a football game that I would really like to attend. Is it all right to accept the ticket?

A: No. ACC employees are not allowed to accept gifts or entertainment from any individual or company while engaged in business negotiations, tender processes and the like.

Q: A key ACC customer is having a dinner party to celebrate his company's anniversary. Other important business people and government officials will be there. I have been invited. Am I allowed to accept the invitation?

A: Yes, provided you are invited as an ACC representative and your supervisor has given his approval.

Community engagement

What does this mean for me?

Q: In your capacity as an ACC employee you are invited to attend an evening gala where a political party's policies will feature in the speeches before fundraising activities get underway. Your gala ticket mentions the topic of the speech and that by purchasing it, the party will benefit. What should you do?

A: Your attendance at the evening political gala could be viewed as support by ACC of the political party. You must exercise care in accepting any such invitation and consult with your Compliance Officer before accepting. In any event, if you do attend then it must be as a private person.

Human Rights

What does this mean for me?

Q: I am working with a supplier. I hear a rumor that this supplier employs children and sometimes prisoners on their work sites. What should I do?

A: You should report the rumor to your local Compliance Officer who will trigger the proper steps with CSR personnel to verify whether these rumors have any substance. ACC takes Human Rights issues seriously and will make every effort to ensure its supply chain does as well.

Advice, guidance and reporting

What does this mean for me?

Q: Your supervisor orders you to change an expenses report, which you know to be in breach of ACC's policies and this Code. You're concerned that your supervisor will make your job difficult if you refuse to carry out what she has told you to do. What should you do?

A: You have identified what may be a serious matter. Normally your supervisor would be the best person to speak to in the first instance. Alternatively, it may be appropriate to raise the matter with your supervisor's manager. Due to your supervisor's involvement, however, calling the EthicalView / Integrity Line is a good option in this situation.

Appendix 2 – Anti-Bribery & Corruption Policy

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1. Introduction, scope of application and objective

We commit to support and enable the healthy growth of communities in which we operate. Abiding by the rule of law and setting an example on how to conduct ethical business is one way for us to put this commitment into action. Bribery undermines the operation of free markets, dilutes public trust in business and government and is deemed a crime in virtually all countries around the world.

Prosecutors aggressively investigate suspected violations, while convictions lead to large financial penalties and/or imprisonment. Obviously, the publicity and negative perceptions that attach to a company that engages in corrupt practices tarnishes its reputation.

At ACC we believe in the following principles:

- All professionals – in business and in government – are expected to perform their duties objectively.
- We do not accept anything of value that might affect our objectivity in doing our jobs.
Likewise, we do not bribe anyone for any reason.
- Every Employee should exercise good judgment to ensure that our interactions with all Third Parties – whether business partners or Public Officials - do not embarrass the Company but instead earn and maintain the public's trust and respect.

Bribery can take a variety of forms – offering or giving money or anything of value to a person that influences or affects our business can be a bribe. In fact, even common business practices or social activities, such as the provision of Gifts and Hospitality, can constitute bribes in some circumstances.

This Anti-Bribery and Corruption (ABC) Policy sets out the relevant principles for appropriate business conduct and related rules when interacting with Third Parties whether Public Officials or commercial parties. It defines who should be considered a Public Official, what activities are never permitted and the types of situations requiring due care, prior review and authorization.

This ABC Policy applies worldwide to all Directors and Employees of ACC / LafargeHolcim Group (as mentioned in the Table concerning Definitions). For Employees who work with consultants, lobbyists, tax advisors or other Third Parties that interact with Public Officials, you must apply due diligence standards in accordance with the Third Party Due Diligence Directive.

2. Policy Principles

2.1 Staying away from Bribery and Corruption

To be sure you stay away from bribery or corruption, never offer, promise or give anything of value in order to influence someone's professional objectivity for the benefit of yourself or ACC. Equally, never request or accept anything of value that might influence your objectivity in doing your job.

ACC may be held accountable not only for acts of bribery or corruption by its employees but also by those acting for or on behalf of ACC. So when using Third Parties for legitimate reasons, it is crucial to ensure that such Third Parties apply the same standards as those that ACC uses itself.

Good judgment is the key. Always ask yourself, before offering or giving money or anything else of value to any person, whether or not what you are considering to do could be viewed as having a wrongful purpose. If the answer is yes, you must not proceed. Things of value that could be perceived as bribery or corruption can take many forms. The most common ones

include actual or promised:

- monetary payments, contributions or kickbacks
- Gifts, Entertainment and Hospitality (e.g. meals, lodging or transportation)
- preferential treatment, favors or Undue Advantages
- free education or training, and
- discounted or free products or services

Given below are specific guidelines you need to follow in order to avoid bribery and corruption when you interact directly or indirectly with Public Officials and business partners.

2.2 Small Payments to Expedite Routine Actions by Public Officials

Never offer or make small, unofficial payments – commonly called “grease”, “speed” or “facilitation” payments - to secure or expedite a routine action by a Public Official. If a Public Official requests such payment, refuse even if there would be negative business consequences. If you face such situations, the Compliance Department can help. See Section 4 for the appropriate contact person.

Official expediting payments pursuant to a written regulation and for which you get an official receipt from the governmental authority are permissible.

2.3 Payments in Situations of Imminent Health or Safety Threats

The company expects that you use good judgment and make best efforts to utilize appropriate resistance protocols if you are asked for an improper payment. If you feel, however, that there is an imminent risk to your health or safety you may make such payments. If a payment is made under these emergency circumstances, you must immediately report it to your supervisor, your Compliance Officer and properly document it in accordance with details given below in Section 2.5

2.4 Gifts, Hospitality and Entertainment

Providing or receiving reasonable Gifts, Hospitality and Entertainment is often an appropriate way to reflect esteem or gratitude or to build stronger business relationships. Nonetheless, Gifts, Hospitality and Entertainment require careful considerations to ensure that they are consistent with the law and our standards of conduct.

In particular, Gifts, Hospitality and Entertainment:

- must be modest, reasonable and infrequent insofar as any individual recipient is concerned, and
- are never permitted, regardless of the amount, if they are in cash or could be perceived as trying to influence the recipient's professional objectivity, or if they are of bad taste, sexually oriented or could embarrass the recipient or ACC.

Before offering, promising or receiving any Gifts, Hospitality or Entertainment you must ensure to comply with the Gift, Entertainment and Hospitality Directive as published and amended from time to time.

2.5 Preferences, Favors or Undue Advantages

Never offer, promise, make, accept or ask for any preferences, favors or other Undue Advantages that could influence or appear to influence your or the recipient's professional objectivity. Examples of such advantages include: a grant of a free or advantageous loan, provision of educational support, hiring a Public Official's or customer procurement officer's relative as an Employee or intern or a promise of a future employment opportunity.

2.6 Third Parties Interacting with Public Officials

The Company may be liable for acts of bribery or corruption by Third Parties whilst interacting with Public Officials for our account or on our behalf. Examples of such Third Parties can include government relations, consultants, immigration consultants, lawyers, tax advisors, technical consultants, customs brokers, security services providers; logistics services providers, large equipment providers and resellers.

Before hiring or renewing the engagement of a Third Party that you expect to interact with Public Officials on our behalf you must:

- follow applicable procurement processes;
- conduct due diligence as set forth in the Third Party Due Diligence Directive;
- sign a written contract that clearly defines the scope of services, invoicing requirements, anti-bribery standards, authorization requirements for Gifts, Hospitality and Entertainment to Public Officials on ACC's behalf, and a clause allowing termination for non-compliance; and
- ensure payments to the Third Party are made only with proof of services rendered, in the same country where services are rendered and at a price that is considered market.

If you manage a relationship with a Third Party that interacts with Public Officials on our behalf, you need to exercise due care to ensure that all relevant Third Party personnel understand ACC requirements and how those requirements apply to their activities.

3. Examples of Business Interactions Requiring Due Care

There are other common business practices or social activities in which Employees or Third Parties may engage for our account or on our behalf that require particular care.

3.1 Corporate Social Responsibility Projects, Sponsorship & Donations

Support of Corporate Social Responsibility (CSR) projects and the use of Sponsorships and Donations (collectively "contributions"), are part of our involvement for the wellbeing of the communities and the environment in which we operate. Such contributions, however, can never be promised, offered or made to secure a business advantage or for any other improper purpose such as to bribe or self-enrich.

Before offering, promising or making any contribution to CSR projects, a Sponsorship or a Donation you must ensure the contribution complies with the CSR projects, Sponsorships and Donations Directive.

3.2 Political Donations and Contributions Involving or Connected With Public Officials

In general, ACC does not make donations to any political party, politician, elected official or candidate for office. Examples of prohibited political donations include:

- cash contributions
- free or discounted use of ACC premises, equipment or other company resources; and
- payment of salary of an ACC Employee working for a political party or candidate working during normal working hours (except if the Employee in question takes a legally permissible paid leave).

Other forms of contributions involving or connected with Public Officials or political parties are allowed only if permissible under written law and after prior review and approval as set forth in section 4.

3.3 Hiring Current or Former Public Official or his/her Relatives

When employing or engaging a current or former Public Official or his/her Relatives as an Employee, board member or contractor/supplier, particular care needs to be exercised to prevent any actual or perceived corruption, conflict of interest or other wrongdoing in connection with such appointment.

In particular, any such relationship needs to be consistent with local written law. Furthermore, as with all hires, our hiring standards, qualification requirements, fair market remuneration principles and mandatory conditions, like individual compliance declarations and acceptance of ACC Code of Business Conduct, must be applied and clearly documented.

3.4 Participation in Organizations

Corrupt dealings by trade associations and other organizations of which ACC is a member can harm our reputation and expose us to liability. For example, if ACC is a financial contributor or an Employee(s) sit(s) on the board of an organization, corrupt dealings by the organization might implicate ACC. Particular care should be paid to trade associations who may deal or lobby on behalf of its members with Public Officials.

Before committing ACC as a member or to renew its membership in an organization that interacts with Public Officials, as part of its purpose, you must comply with due diligence requirements as set out in the Third Party Due Diligence Directive.

4. Seeking Advice, Review and Approval

Requests for advice, review and approval in relation to the ABC Policy must be submitted to your Compliance Officer. If there is no Compliance Officer, you should escalate your request to the Regional Compliance Officer of LH and, if none in place, to the Head of LH Group Compliance.

In addition to the specific review and approval requirements mentioned in prior sections, if you have any doubt whether or not a particular transaction may be regarded as a bribe, corruption or an improper advantage, you must seek prior advice and approval from your Compliance Officer or, if none, as per the escalation described in paragraph above. You may report non compliance of this Policy to the channels mentioned in Section 5 of the Code of Business Conduct.

5. Record Keeping and Reporting

Any payment, Gift, Hospitality or Entertainment in relation to an interaction with a Public Official, whether made by ACC or a Third Party interacting for our account or on our behalf, must be identifiable and properly recorded and documented.

If anyone has asked you, directly or indirectly, to make a payment or confer an advantage to anyone in violation of this Policy, it is your duty to immediately report this to your Compliance Officer. If no Compliance Officer is appointed, you should report this event to the Regional Compliance Officer and, if none in place, to the Head of Group Compliance. Alternatively you may report the same through the EthicalView Reporting system or via the Integrity Line.

6. Exceptions and Modifications

In the unlikely situation where an exception or modification to the principles set out in this Policy would be required, the request for exception must be made in good faith and submitted in writing (incl. email) to the Head of Group Compliance.

7. How you will be trained on this topic

ABC principles are specifically covered in the ACC's Code of Business Conduct, which is applicable to all Employees. Certain Employees identified as Medium or High Exposed ABC Employees have additional training requirements (e-learning and face-to-face trainings) as approved by Group EXCOM from time to time. Training must be provided by a member of the Compliance Function or an Employee that has received the appropriate training as documented by a train-the-trainer certification on this topic.

Definitions and Abbreviations

<i>ABC</i>	Anti-Bribery and Corruption
<i>CSR Projects</i>	Long term projects aiming to improve people's living condition in a sustainable way and focusing on the needs of the communities where ACC operates. These projects are coordinated and implemented in collaboration between ACC and an institution or organization and ACC does not receive or expect to receive a business or financial advantage in return.
<i>Director</i>	Member of the ACC board of directors and any Group Company board of directors (including executive and non-executive directors) or, in Group Companies applying a two-tier board system, any member of the supervisory board.
<i>Donations</i>	Donations are voluntary one off contributions to an institution or organization where ACC does not receive or expects to receive anything in return. Donations can be monetary or in kind support, such as the supply of material.
<i>Employee</i>	All officers and Employees of ACC, including interns, temporary workers, contract workers and anyone over whom ACC could reasonably be expected to exert control in the way the person completes his or her work.
<i>Entertainment</i>	Refers to the provisions to a Third Party of an opportunity to participate in an event or an activity such as a show, a performance or a game. To be considered as Entertainment, the provider must be present during the event or activity otherwise this is a Gift and must be treated as such.
<i>Gift</i>	See definition of Hospitality and Entertainment
<i>Government Instrumentality</i>	Any government-controlled entity including universities, hospitals and commercial enterprises. An entity is government-controlled if a government (a) owns or controls 50% or more of the entity's shares or (b) can otherwise direct the management, policies or affairs of that entity.
<i>High Exposed ABC Employees</i>	All EXCO members and all Employees in N-1 and N-2 positions (where N is the CEO). Heads and direct reports of the following functions: Finance, Procurement, CAPEX, Trading, Regulatory/Quality, Government Relations, Geocycle (AFR), IT, Strategy/ M&A, Communications, Commercial/ Sales, Growth & Innovation/Marketing, Performance & Cost, HR, Sustainable Development, Environment and plant management. All Legal/Compliance, Internal Audit and Internal Control Employees.

<i>Hospitality and Entertainment</i>	<p>Refers to the provision to a Third Party of travel, transportation, lodging or entertainment it also includes and / or meals when offered as part of, or alongside, an entertainment, or other similar forms of treatment towards Third Parties.</p> <p>To be considered as Hospitality or Entertainment, the provider must be present otherwise this is a gift and must be treated as such.</p>
<i>Compliance Officer</i>	Formally appointed Compliance Officer responsible for the defined geography.
<i>Medium Exposed ABC Employees</i>	All Employees in addition to High Exposed ABC Employees who have the potential to interact with public officials or participate in business negotiations (with commercial discretion) with private business partners on behalf of ACC and the Group Company.
<i>Public International Organization</i>	An organization whose members are countries, government or other Public International Organizations.
<i>Public Officials</i>	Any officer, Employee or person acting on behalf of (a) a government, its department, agency or Government Institution or (b) a Public International Organization. The term also includes political party officials and candidates for political office as well as family members of any of the above.
<i>Relatives</i>	Refers to (a) immediate family members i.e. spouse, partner, girlfriend/boyfriend, parents and grandparents, children and stepchildren, siblings, mother-, father-, brothers- and sisters-in-law, and (b) other close relationships such as close friends or partners.
<i>Sponsorships</i>	Involve a monetary or in kind contribution to a charity or not-for-profit organization in return for the on-going rights to associate with an activity, item, person, organization or property or in exchange for building reputation.
<i>Undue Advantage</i>	Refers to something to which the company or person concerned is not clearly or legally entitled, such as an operating permit for a factory which fails to meet statutory requirements.