



# HeidelbergCement Georgia

## Summary

There are two major allegation areas related to HeidelbergCement Georgia's business activities:

### ➔ Supply Chain Connection to the Tkibuli Mines:

HeidelbergCement Georgia is a main purchaser of coal from the Tkibuli coal mines, which have faced serious allegations of human rights abuses and workplace deaths.

### ➔ Air Pollution and Health Impacts:

Local community members in Kaspi, the location of a Heidelberg plant, claim that high levels of air pollution have caused health effects and cancer. A representative of Friends of the Earth emphasised that, although pollution is serious in Kaspi, it is difficult to attribute it to a single company, and that many other factories are present within the area.

Both the HeidelbergCement Georgia website and the HeidelbergCement website feature information about human rights and sustainability. HeidelbergCement Georgia responded to our questionnaire concerning its human rights policies and commitments; see the annex for the full response.



Country: **Georgia**



**Website**



**BHRRC company page**

## Human Rights Commitments

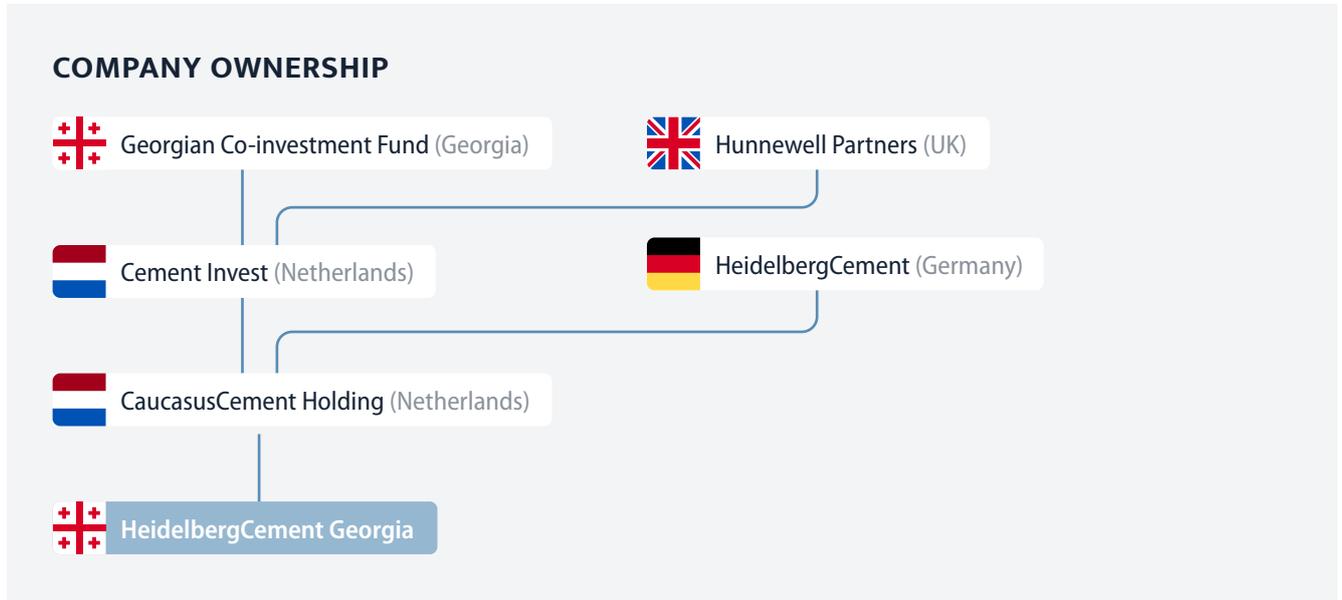
- ⊕ Policies and commitments are available on the parent company website
- ⊕ [Human rights policy](#)
- ⊕ [Code of Conduct and Corporate Governance](#)
- ⊕ [Supplier Code of Conduct](#)
- ⊕ [Sustainability Report](#) (includes information about health and safety)
- ⊕ [Water and sanitation policy](#)
- ⊕ HeidelbergCement responded to our questionnaire of its human rights policies and commitments; see the annex for the full response

## Human Rights Impacts

- ⚠ Environmental and water rights
- ⚠ Abuses related to supply chain and business partners

## Company Information

HeidelbergCement Georgia is jointly owned by HeidelbergCement, which is based in Germany, and Cement Invest, which is based in the Netherlands. The Georgian Co-Investment Fund, a private equity fund, also invests significantly in the HeidelbergCement Georgia via Cement Invest.



HeidelbergCement Georgia and Kavkaz Cement jointly established the Georgian Cement Association, which tests cement in order to determine quality and to identify counterfeits in the market. The association partners with the Georgian Chamber of Commerce and independent labs. Because of the high risks associated with the use of fake cement, this initiative can help to improve health and safety across Georgia’s construction sector. The initiative can also improve safety more broadly across Georgia, as buildings constructed using fake materials can present significant risks to the occupants.

Around the time the initiative was established, the company faced accusations of a ‘cement scandal’. Local cement producers claimed the government had acted for the company’s interests by blocking the import of clinker, the raw material for cement. The only clinker manufacturer in the country is HeidelbergCement Georgia. After the other cement producers said they could not reach an agreement with HeidelbergCement about sourcing clinker, they sought to import it from other places. According to the general director of Magniumgroup, ‘After the possibility of import from Iran appeared, we breathed freely, but now we are forced to dismiss about two thousand people to their homes. We have no choice but to take extreme measures of protest’.

In response, HeidelbergCement Georgia told the BHRRC, ‘There were many political reasons why Iranian imports were put on temporary hold for some period of time and those political matters are not related to HeidelbergCement at all—mainly US sanctions and geopolitical situation in the region for that specific period. On the other hand imported clinker from Iran that time was clear DUMPING (priced for 20 USD, while only transport costs, where more than min 27-28 USD) in addition to this, there was no dumping law at that time in Georgia and HeidelbergCement was just lobbying the idea to have antidumping mechanism in the future (which is still not enforced as of today)’.

# Human Rights Allegations

## Supply Chain: Connection to the Tkibuli Mines

According to HeidelbergCement Georgia's website, the company seeks compliance with international social accountability standard SA 8000, environmental standard ISO 14001, and the principles of the International Labor Organization in its upstream supply chain. The company touts its Supplier Code of Conduct in line with these principles.<sup>↗</sup>

Despite this commitment, the company is a main purchaser of coal from the Tkibuli coal mines, which have faced strong allegations of human rights violations and workplace deaths.<sup>↗</sup> The United Nations and Human Rights Watch have reported on the severe conditions within the Tkibuli mines, which have led to the deaths of nineteen coal miners within the span of three years.<sup>↗</sup>

See company profile for [Saknakshiri](#) for more information. In summary, some of the allegations include:

- ➔ **Deaths and Suspension of Operations:** Dozens of people have died in the Tkibuli mines, largely due to issues around occupational health and safety. Thirty-eight workers died from 2009 - 2019.
- ➔ **Occupational Health and Safety:** Almost all miners interviewed by Human Rights Watch said that they had been injured, at some point, in a workplace accident. 'When miners go inside, every day they expect injury or death', one worker told an interviewer.
- ➔ **Payment and Compensation:** Workers said they were not compensated for several hours of company-related activity each day. Miners also said that the company regularly deducted 10 -20% of their wages.
- ➔ **Right to Livelihood:** The suspension of the mines took a severe toll for local workers, most of whom relied on mining for their livelihood. Saknakshiri agreed to pay the miners their salaries until the mines reopened; however, three months after the mines shut down, Saknakshiri said it had run out of money and the payments stopped.

During 2017, Green Alternative reported that the non-executive director at Saknakshiri (the company that operates the Tkibuli mines) was the brother of a chairman of HeidelbergCement Georgia.<sup>↗</sup>

In response, HeidelbergCement Georgia told the BHRRC, 'HeidelbergCement Georgia is indeed buying coal from Tkibuli coal mine. We are the biggest local coal buyers. Tkibuli mine is the only coal source in Georgia that produces the amounts feasible for us. The contract is part of our CSR activities as we are supporting with this contract local production, local families, and communities. We are aware of H&S issues, which this coal mine had in the past. This was one of the reasons we had stopped contracting them'.

The company continued on to say, 'To our best knowledge, in 2019 Tkibuli coal mine changed ownership and went through several modernization and production upgrade steps. This also included improving H&S standards and getting the labor safety to the level defined by Georgian legislation. Therefore, the government has allowed them to continue the production process. Only after this, we resumed buying the coal from the mine'.

Allegations of unsafe conditions in the Tkibuli coal mines have continued since the change of ownership. Notably, five miners were allegedly poisoned by toxic fumes after management instructed them to walk through an underground ventilation tunnel. Additionally, workers claim the ventilation issues in the mine—which contributed to the accidents that killed ten workers during the span of three months—have not been resolved.<sup>↗ ↗ ↗</sup>

## Air Pollution and Health Impacts

Local community members of Kaspi, the location of a Heidelberg plant, claim that high levels of air pollution have caused health effects and cancer. According to one local man, 'The plant has a bad impact on the environment and on health. Almost no one farms in Kaspi, as the dust destroys everything. Most of the population has thyroid problems.'<sup>2</sup> During 2010, Georgia's Ministry of Environment and Natural Resources Protection listed HeidelbergCement's Kaspi plant as a major air polluter.<sup>2</sup>

Follow-up reporting found that, during 2016, the Ministry of Environmental Protection and Natural Resources took air samples of the surrounding area and found that HeidelbergCement Georgia within relevant legal requirements. However, the company was fined for excessive air pollution within the factory's territory. A representative of Friends of the Earth emphasised that although pollution is serious in Kaspi, it is difficult to attribute it to a single company, and that many other factories are present in the area.<sup>2</sup>

In response, HeidelbergCement Georgia told the BHRRC, 'In 2019, HeidelbergCement Georgia modernized the historical clinker production line in Kaspi, putting in place New Dry Clinker Production Line, that is in full compliance with environmental requirements. HeidelbergCement Georgia is working actively to minimize its dust emissions; dust emission from organized sources is minimal as emission points are equipped with filters. In order to mitigate the dusting during transportation, the Company is doing road projects and at the same time is mitigating the risk by watering the roads, adding the fog cannons on the premises in order to minimize the dusting is planned for the current year'.

The company also stated, 'There are many sources of air pollution in Kaspi. There is no specific indication that general ambient air quality in Kaspi or any health problem of local residents are attributable to HeidelbergCement Georgia'.

## Human Rights Commitments

On their respective websites, HeidelbergCement Georgia and HeidelbergCement have a number of policies and commitments related to human rights and the environment.

- ➔ A human rights policy ([available here as a download](#))
- ➔ [A Supplier Code of Conduct](#)
- ➔ Participation in the [UN Global Compact](#)
- ➔ [A Sustainability Report](#), which includes a public commitment to ILO standards and information on health and safety
- ➔ [A Declaration of Corporate Governance](#)
- ➔ [A water and sanitation policy](#)

In a statement to the BHRRC, HeidelbergCement Georgia said, 'Our employees' working conditions are in compliance with the internationally recognized basic labor standards and applicable laws of Georgia. Compliance with the ILO core labor standards is compulsory for us and company has different mechanisms to monitor the compliance with the rules. The major rules include, though is not limited to, the following: prevention of child and forced labor, compliance with the principle of non-discrimination in the workplace, fair and decent remuneration of the employees, the right of freedom of association as well as collective bargaining. The company ensures safety and security measures and follow an operating framework that respects human rights and international humanitarian law'.

HeidelbergCement Group states it is committed to its responsibility to respect human rights. The company says that in all countries in which the company is active, it complies with the applicable laws and regulations as the legal basis of its business activity. The company also says it is committed to global values and standards, including:

- ➔ The Universal Declaration of Human Rights
- ➔ The eight core labour standards of the International Labour Organization (ILO)
- ➔ The OECD Guidelines for Multinational Enterprises
- ➔ The United Nations Guiding Principles for Business and Human Rights ('Protect, Respect and Remedy' Framework)

The company emphasises that it expects employees and business partners to comply with the key guidelines and recommendations.

The HeidelbergCement Sustainability Commitments 2030 emphasise the importance of responsible sourcing and supplier sustainability for our purchasing activities. In accordance with social and environmental responsibility, the Supplier Code of Conduct sets out comparable standards which are enforced through our Global Supplier Sustainability Initiative. The company explains, 'Supplier compliance with these standards will enable us to realise long-term collaborations, working towards a more sustainable, responsible future.'

HeidelbergCement also has a grievance mechanism, [available here](#). According to the company, 'Our grievance mechanism is operated by an independent third party to ensure anonymity for individuals submitting a grievance. All reported grievances are documented, assessed, and followed-up by our Group-wide compliance function. The grievance mechanism is accessible via phone and internet and available in every local language spoken in areas where HeidelbergCement operates'.

# Annex 1

## HeidelbergCement Response to Company Profile

Thank you for your email.

We have reviewed the report and references and would like to emphasize, that the report we see in general is very subjective, as none of the information provided from our side was reflected in the report. From reputable organization like yours, we expected much more detailed and deep analyses and not only “rumors” based on 1 or 2 articles.

In this report, we very much miss your efforts to check the truth and reality behind the “rumors”. Finally, we could not understand, what is the purpose and the idea of the report that covers many different topics, that has no ground and sounds like an accusation without any facts.

Below, you can find our comments and the answers on your questions:

- *Air Pollution and Health Impacts: Local community members in Kaspi, the location of a Heidelberg plant, claim that high levels of air pollution have caused health effects and cancer. A representative of Friends of the Earth emphasized that although pollution is serious in Kaspi, it is difficult to attribute to a single company, and that many other factories are present in the area.*

In 2019, HeidelbergCement Georgia modernized the historical clinker production line in Kaspi, putting in place New Dry Clinker Production Line, that is in full compliance with environmental requirements.

HeidelbergCement Georgia is working actively to minimize its dust emissions; dust emission from organized sources is minimal as emission points are equipped with filters.

In order to mitigate the dusting during transportation, the Company is doing road projects and at the same time is mitigating the risk by watering the roads, adding the fog cannons on the premises in order to minimize the dusting is planned for the current year.

There are many sources of air pollution in Kaspi. There is no specific indication that general ambient air quality in Kaspi or any health problem of local residents are attributable to HeidelbergCement Georgia.

- *Supply Chain Connection to the Tkibuli Mines: Heidelberg Cement Georgia is a main purchaser of coal from the Tkibuli coal mines, which have faced serious allegations of human rights abuses and workplace deaths. (We have attached our company profile on Saknakshiri for your reference; please note we are awaiting a response from this company and this profile has not yet been published.)*

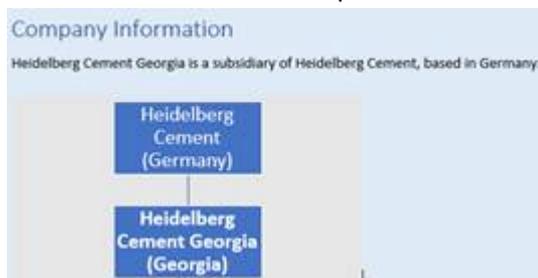
HeidelbergCement Georgia is indeed buying coal from Tkibuli coal mine. We are the biggest local coal buyers. Tkibuli mine is the only coal source in Georgia that produces the amounts feasible for us. The contract is part of our CSR activities as we are supporting with this contract local production, local families, and communities.

We are aware of H&S issues, which this coal mine had in the past. This was one of the reasons we had stopped contracting them.

To our best knowledge, in 2019 Tkibuli coal mine changed ownership and went through several modernization and production upgrade steps. This also included improving H&S standards and getting the labor safety to the level defined by Georgian legislation. Therefore, the government has allowed them to continue the production process. Only after this, we resumed buying the coal from the mine.

## Company information - HeidelbergCement Georgia

The chart included in the report is not accurate.



HeidelbergCement is represented in Georgia with a jointly owned CaucasusCement Holding B.V. (100% owner of HeidelbergCement Georgia) with 50% of the voting shares. Another 50% (voting shares) of the CaucasusCement Holding B.V. is owned by Cement Invest B.V., an investment company jointly managed and owned by the Georgian Co-Investment Fund (“GCF”) and Hunnewell Partners (“Hunnewell”).

HeidelbergCement and Cement Invest jointly control the resulting joint venture.

- *Heidelberg Cement Georgia does not have its own website*

Company does have a website. The address you have already used in the report as a reference. [www.heidelbergcement.ge](http://www.heidelbergcement.ge)

- *Around the time the initiative was established, the company faced accusations of a “cement scandal”. Local cement producers claimed the government had acted in the company’s interests by blocking the import of clinker, the raw material for cement. The only clinker manufacturer in the country is Heidelberg Cement Georgia.*

There were many political reasons why Iranian imports were put on temporary hold for some period of time and those political matters are not related to Heidelbergcement at all – mainly US sanctions and geopolitical situation in the region for that specific period. On the other hand imported clinker from Iran that time was clear DUMPING (priced for 20 USD, while only transport costs, where more than min 27-28 USD) in addition to this, there was no dumping law at that time in Georgia and Heidelbergcement was just lobbying the idea to have antidumping mechanism in the future (which is still not enforced as of today).

## Human Rights

Our employees’ working conditions are in compliance with the internationally recognized basic labor standards and applicable laws of Georgia. Compliance with the ILO core labor standards is compulsory for us and company has different mechanisms to monitor the compliance with the rules. The major rules includes though is not limited to the following: prevention of child and forced labor, compliance with the principle of non-discrimination in the workplace, fair and decent remuneration of the employees, the right of freedom of association as well as collective bargaining. The company ensures safety and security measures and follow an operating framework that respects human rights and international humanitarian law. All issues in this

regard, that was raised by your organization was decently answered and provided to you via the questionnaire.

Should you need any further information, please do not hesitate to contact me.

With kind regards,

**Natia Tsvariani**  
Communications, Marketing & Public Relations Manager

### **BHRC Response to HeidelbergCement Georgia**

Dear Natia Tsvariani,

Thank you for taking the time to reply to our email. Your responses have been helpful, and we will incorporate them into the revised company profile. In particular, thank you for clarifying the ownership structure; we will amend this accordingly.

Our company response mechanism ensures that when allegations against companies are raised, their responses are made publicly available alongside the material raising these allegations. We believe that it is important to give companies the opportunity to respond when concerns are raised about their operations, so that our readers have access to the company's perspective. We present the company's perspective in full. With regards to information provided by Heidelberg Cement Georgia, the company's full response to the questionnaire will be included, as previously indicated. This will give readers the opportunity to review your answers in detail.

The Business & Human Rights Resource Centre compiles reports and responses from a variety of third parties, including companies, media outlets, and NGOs. As part of this process, we review a number of sources with different perspectives. For instance, regarding the air pollution concerns, the profile explains that while some individuals have raised questions about pollution, this has not been independently verified and there are other factories in Kaspi; as such, it is difficult to attribute any pollution to a single company, including Heidelberg Cement Georgia. We will also include your response below on your updated production line and risk management procedures, so readers can view a variety of viewpoints, including that of Heidelberg Cement Georgia.

With regards to Tkibuli, allegations surrounding health and safety have persisted after the change in ownership. Reports include the following:

- OC Media: "According to Guram Kirkitadze, before the mine accident when a ventilation pipe carrying explosive gases ruptured, in spite of workers' complaints Saknakhshiri LCC refused to repair or replace it. Today, Tkibuli miners have told OC Media, that despite the mine coming under new ownership, the ventilation problem is still not resolved."

- <https://oc-media.org/features/stujk-between-a-rojk-and-a-hard-plaje-the-miners-of-tkibuli/>
- Georgia Today: "The workers explain that their protest followed a decision of the company to temporarily shut down the Dzidziguri shaft, "forcing" employees to move to a hazardous location through the underground ventilation tunnel, which workers refused to do after five miners were taken to Kutaisi hospital allegedly due to poisoning from the gas which had accumulated in the same tunnel."
  - <http://georgiatoday.ge/news/19965/Striking-Tkibuli-Miners-Request-Meeting-with-Authorities>
- OC Media reporting on dust particles and lung disease: "Miners from Tkibuli's Mindeli and Dzidziguri shafts complain that industrial diseases can be the least of their problems, as the mine administration neglects even the basic safety of their employees. Accidents in the mines, sometimes fatal, are reported regularly."
  - <https://oc-media.org/features/we-all-have-bronchitis-the-blackened-lungs-of-georgias-coal-miners/>

Thank you for your time,



**Ashley Nancy Reynolds**

Research Assistant, Eastern Europe & Central Asia

Business & Human Rights Resource Centre

Follow us on: [@bhrrc](#) | [Facebook](#) | Sign up for free [Weekly Updates](#)

## Annex 2

### Human rights policies and practice – questions for companies

**Company name:** HeidelbergCement AG on behalf of HeidelbergCement Georgia

**Respondent's department:** Group Communication

**Name of respondent:** [this will be kept confidential] Katharina Plonsker

**Email address of respondent:** [this will be kept confidential]  
[katharina.plonsker@heidelbergcement.com](mailto:katharina.plonsker@heidelbergcement.com)

#### Governance and Policy Commitments

##### 1. Commitment to respect human rights.

a) Does your company have a publicly available commitment to respect human rights?

YES / NO

If YES, please provide the web-link for this policy commitment

[https://www.heidelbergcement.ge/system/files\\_force/assets/document/human\\_rights\\_position\\_heidelbergcement\\_en.pdf?download=1](https://www.heidelbergcement.ge/system/files_force/assets/document/human_rights_position_heidelbergcement_en.pdf?download=1)

If your company has a commitment to respect human rights, but it's not publicly available, please provide an attachment (*please note it will be published on our website*):

b) Does your company require that its business partners also commit to respecting human rights, including rights related to salient risks to communities' livelihoods, security, and health (such as the right to water and the ownership or use of land and natural resources)?

YES / NO

If YES, explain how this requirement is implemented:

For suppliers this is implemented via the HeidelbergCement Group's Supplier Code of Conduct, which is a basis to close contracts with suppliers and service providers. We furthermore assess critical suppliers via our supplier management and qualification system, which includes a sustainability assessment from a third party.

<https://www.heidelbergcement.com/en/global-supplier-sustainability-initiative>

##### 2. Commitment to respect labour rights of workers.

Does your company have a publicly available policy commitment to respect labour rights that the ILO has declared to be fundamental rights at work (ILO Core Labour Standards) or a publicly available policy commitment to respect the ten principles of the UN Global Compact?

YES / NO

If YES, please provide the web-link for this policy commitment:

We commit to respect the ILO standards as well as other international values and standards, see p. 25 of our Group Sustainability Report 2019. Our Sustainability Report also serves as our yearly Communication on Progress (COP) towards the ten principles of the UN Global Compact.

[HeidelbergCement AG | UN Global Compact](#)

[Sustainability Report | HeidelbergCement Group](#)

<https://www.heidelbergcement.com/en/declaration-of-corporate-governance>

[https://www.heidelbergcement.ge/system/files\\_force/assets/document/human\\_rights\\_position\\_heidelbergcement\\_en.pdf?download=1](https://www.heidelbergcement.ge/system/files_force/assets/document/human_rights_position_heidelbergcement_en.pdf?download=1)

### **Remedies and Grievance Mechanisms**

#### **3. Grievance mechanisms to receive complaints or concerns from workers, external individuals, and communities.**

Does your company have one or more channels/mechanisms (its own, third party, or shared) through which workers, individuals, and communities who may be adversely impacted by your company can raise complaints or concerns, including in relation to human rights issues?

YES / NO

If YES, please explain how this mechanism can be accessed:

Our grievance mechanism is operated by an independent third party to ensure anonymity for individuals submitting a grievance. All reported grievances are documented, assessed, and followed-up by our Group-wide compliance function. The grievance mechanism is accessible via phone and internet and available in every local language spoken in areas where HeidelbergCement operates.

<https://www.speakupfeedback.eu/web/heidelbergcement>

[Declaration of Corporate Governance | HeidelbergCement Group](#)

#### **4. Remedying adverse impacts.**

Does your company provide for or cooperate in remediation to victims, where it has identified that it has caused or contributed to adverse human rights impacts (or others have brought such information to the company's attention, such as through its grievance channels/mechanisms)?

YES / NO

If YES, please provide examples:

If a grievance related remedy is appropriate, we act accordingly. Our Compliance Incident Reporting & Case Management Guideline explains in the chapter "Remedial actions" potential measures and the responsibility.

### **Performance: Company Human Rights Practices**

## 5. Living wage.

- a) Does your company pay all its workers a living wage<sup>2</sup> which is regularly reviewed and negotiated through collective bargaining with relevant trade unions?

YES / NO

All salaries paid exceed the Georgian minimum wage concept and cover employees' essential needs. We also have a regular wage for employees who changed their living place because of the position change that is regulated by the individual labor agreements and respective guideline. There is a regular annual salary review procedure for blue collar workers in Georgia as well, to ensure that they receive equal and decent pay for their work.

- b) Do workers receive equal pay for equal work<sup>3</sup>?

YES / NO

Yes. Any form of discrimination is condemned by our Group-wide Code of Conduct. Non-compliance by any employee can lead to disciplinary measures including dismissal.

## 6. Transparency and accountability.

*(For Armenian and Kazakh companies)* Does your company participate fully in the Extractive Industry Transparency Initiative (EITI) and publish information as required under the EITI?

YES / NO

*(for Georgian companies)* Does your company promote transparency by reporting taxes, revenue payments and disclosing contracts?

YES / NO

If YES, please provide examples:

As a company registered in Germany, HeidelbergCement falls under the Council Directive (EU) 2016/881, which demands public country-by-country reporting on this matter. In alignment with this directive, we file a country-by-country report to German authorities.

## 7. Freedom of association and collective bargaining.

- a) Does your company have a commitment to not interfere with the right of workers to form or join trade unions and to bargain collectively?

YES / NO

<sup>2</sup> There are numerous definitions of living wage, but the core concept is to provide a decent living for a worker and his or her family (in line with ICESCR Article 7) based on a regular work week, not including overtime hours. A living wage is sufficient to cover food, water, clothing, transport, education, health care and other essential needs for workers and their entitled official dependents, as well as provide some discretionary income.

<sup>3</sup> Every worker has the right to expect equal pay for equal work regardless of their gender, race, religion, national origin, age, or physical/mental abilities.

Yes. In accordance with our Group human rights policy, we adhere to the ILO core conventions in all our operations and enable collective bargaining and unionization where national law allows for it.

- b) Does your company have measures in place to prohibit any form of intimidation or retaliation against workers seeking to exercise these rights?

YES / NO

If YES, please provide details:

Yes. Our own Code of Conduct addresses these issues explicitly. In order to being able follow-up on any misconduct we implemented a publicly accessible compliance hotline, where grievances can be brought forward anonymously.

[Declaration of Corporate Governance | HeidelbergCement Group](#)

- c) What percentage of your company's workforce is covered by collective bargaining agreements?

We reported on the proportion of employees within HeidelbergCement represented by H&S committees with trade union representation in our Group Sustainability Report 2019, p. 88 – in 2019, their share amounted to 94.3 %.

## 8. Workplace health and safety.

- a) Does your company have health and safety policies and procedures, including accident prevention and remediation, which comply with industry, national, and international standards?

YES / NO

If YES, what steps does your company take to ensure the health and safety policies and procedures are applied to workers?

We have several specific internal guidance documents and conduct issue specific safety initiatives in all our sites and operations. All operational units have dedicated H&S staff, which report directly to the plant management resp. country management. A company-wide accident database has been implemented and the Group CEO is informed within 24 hours about any fatality. Dedicated H&S staff at local, area and Group level define guidelines and hazard minimization procedures that have to be followed by all employees and all contractors as well. Compliance with the given rules is checked by local H&S staff and as part of safety conversations, performed by the respective line manager.

- b) Does your company disclose quantitative information on health and safety related to its direct employees, its workers, and on-site contractors, namely: injury rate, fatality rate, lost days, or near-miss frequency rate?

YES / NO

If YES, please provide the web-link:

Yes. See Group Sustainability Report 2019, pages 59-63 and H&S key figures on page 88.

[https://www.heidelbergcement.com/en/system/files\\_force/assets/document/93/63/heidelbergcement-sustainability-report-2019.pdf](https://www.heidelbergcement.com/en/system/files_force/assets/document/93/63/heidelbergcement-sustainability-report-2019.pdf)

## 9. Land rights.

When acquiring, leasing or making other arrangements to use (or restrict the use of) land, does your company have a policy that recognises legitimate tenure rights, with particular attention to vulnerable rights-holders?

YES / NO

If YES, please provide a copy:

This is part of our human rights due diligence and investment due diligence procedures. Key criteria include compliance and human rights aspects, as well as social impacts and impacts on neighborhood communities.

## 10. Security.

a) Does your company ensure that safety and security measures, such as the use of security guards, follow an operating framework that respects human rights and international humanitarian law?

YES / NO

If YES, please provide details:

We have taken all necessary precautions for safe work of our employees in accordance with the policies and principles of the Group as set out above. While we have safety guards on place at our Georgian operations, they are not armed.

b) Are security and safety personnel required to act in a manner consistent with applicable international standards, particularly with regard to the use of force?

YES / NO

## 11. Water and sanitation.

Does your company implement preventive and corrective action plans to address identified, specific risks to the right to water and sanitation in its operations?

YES / NO

If YES, please provide examples:

HeidelbergCement actively supports the sustainability goal of the UN, which aims at providing access to safe and affordable drinking water to all people. By signing the so-called WASH Pledge (Pledge for Access to Safe Water, Sanitation and Hygiene at the Workplace”) of the World Business Council for Sustainable Development (WBCSD), we have committed to ensure access to drinking water as well as sanitation and hygiene for all employees. We also report on the implementation of the WASH Pledge in our Group Sustainability Report (pages 61, 78).

<https://www.heidelbergcement.com/en/safe-water-sanitation-and-hygiene-at-the-workplace-wash>