



It is LafargeHolcim's Policy that all of its business dealings are carried out in full compliance with applicable laws and regulations which includes, among others, antitrust rules. LafargeHolcim is fully committed to ensuring that all employees adhere to this Policy at any time. In pursuit of this objective, and in light of constantly developing antitrust rules and their application in Europe, LafargeHolcim in Italy has adopted the following rules for the product areas of cement (*i.e.*, grey cement) and cementitious products (*i.e.*, GGBS, GBS, and fly ash) to be applied within the European Economic Area (EEA) and Switzerland in order to further strengthen the company's existing high standards of compliance to be implemented immediately and fully in effect by April 15, 2016:

1. Unless required by government agencies, LafargeHolcim will not provide directly, or indirectly through any trade association, any non-public, individual information that is not at least six months old in respect of their sales, production, import/export, of specific cement or cementitious product-types or lines.
2. If not approved otherwise by a respective national Competition Authority, LafargeHolcim will only enable any trade association to proceed with any exchange of the aforesaid information provided it is made through an independent third-party private organization on the basis of strict verifiable confidentiality agreements which must create appropriate firewalls between such association and its members ("the Confidentiality Agreements").
3. Unless required by government agencies, LafargeHolcim will not provide directly, or indirectly through any trade association any non-public, individual data in respect of their sales, production, and import/export that is not at least one year old, with respect to Member States or administrative regions where LafargeHolcim knows that there are fewer than four suppliers of data.
4. The Confidentiality Agreements should be signed by the independent third-party private organization, the trade association and the members thereof and require the independent third-party private organization to inform LafargeHolcim immediately and not to disclose the respective data if there are fewer than three suppliers of data.
5. LafargeHolcim will make their membership in any trade association dependent upon (i) the adherence by such association to (a) the Confidentiality Agreements referred to above and (b) a compliance program (or equivalent internal code of conduct) that shall include rules regarding the collection, aggregation, or publication of the data in question, as well as the conduct of any meeting or business of the association, and (ii) the appointment of an internal compliance officer/function with responsibility for implementing and monitoring the strict adherence of such association to the compliance program and the Confidentiality Agreements referred to above.
6. LafargeHolcim will not send generic price announcement letters to their customers.
7. Price letters are generic if they lack any of the following individual information about the customer: (i) customer specific contact details; (ii) product requirements and prices



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(meaning proposed gross price for cement and cementitious products); and (iii) the effective date of the envisaged price change.

8. LafargeHolcim will avoid disclosing publicly outside their internal organization their future strategic plans on quantities or pricing policy in any media or publically accessible company website, or otherwise making public announcements, except in the context of customer relations (or other measures in compliance with Section II.), or financial disclosures (including customary analyst reports, financial road-shows, annual reports and annual meetings) or to comply with any applicable financial or corporate regulatory obligation.
9. As regards GBS and GGBS supply contracts entered into with steel manufacturers, LafargeHolcim will continue to ensure the compliance of such contracts with European antitrust rules for vertical agreements.

Paris/Zurich

November 3, 2015