# Speak Up Policy

# CRH Speak Up Policy

## Concerned about possible wrongdoing? For example:

| | |
|---|---|
| I have serious concerns about safety at my site | I suspect misuse of CRH funds |
| This gift seems inappropriate for a government customer | I was asked to report hours that I didn't work |
| Is this a conflict of interest? | I suspect inventory theft at my site |

Speak Up!

## How?

**CRH Hotline**
www.crhhotline.com

Or call the number found on the poster at your site. You can choose to remain anonymous

**Legal and Compliance**

Speak Up to your local Legal and Compliance contact or senior Legal and Compliance leadership

**Business Management**

Speak Up to the leadership of your local business

**Speak Up Point of Contact**

(where available)

Speak Up to the Point of Contact for your local business

**Fraud Point of Contact**

Speak Up about any suspected, attempted, or actual fraud/theft to your Fraud POC

CRH takes all Speak Up Reports seriously and will investigate your concern

## I. Introduction

CRH is committed to supporting all persons, including current, potential, and former employees, independent contractors, customers, and suppliers in coming forward with any genuine concerns of wrongdoing within CRH. This Speak Up Policy (the "Policy") forms part of this commitment.

If a person has a genuine concern of possible wrongdoing relevant to CRH's Code of Business Conduct, inappropriate or illegal behaviour, or violations of local laws (generally referred to as a "Reportable Concern"), they should report it under this Policy. They should "Speak Up".

Examples of Reportable Concerns for the purpose of this Policy are genuine concerns relating to any of the following:

- Legal Obligations: failure to comply with any legal obligations (examples include concerns relating to public procurement, consumer protection, financial or non-financial reporting/record-keeping), except for Employment Concerns as described below
- Health & Safety breaches: any health, safety, or environmental concern (examples include transport safety, protection of the environment, public health, product safety and compliance)
- Criminal Offences: any criminal offence (examples include fraud, theft, antitrust/competition violations, bribery and corruption)
- Security breaches: any threat to the protection of personal data and security of network and information systems
- Unethical behaviour: any violation of the CRH Code of Business Conduct, except for Employment Concerns as described below
- Practices causing harm to CRH or its people: any violation of a CRH policy that could cause harm to CRH and/or its people, except for Employment Concerns as described below; and
- Retaliation: any concerns of retaliation for Speaking Up

Notwithstanding any other provision of this Policy, Reportable Concerns do not include, and this Policy is not intended to apply to:

Employment Concerns Each CRH business has employee-related policies and procedures ("Employment Policies") in place to address employee concerns, complaints, and issues regarding (1) their interactions with their supervisors, company management, and other employees and (2) the terms and conditions of their employment. If an employee has a complaint of this nature, it is referred to as an "Employment Concern". Proper handling of these concerns requires a thorough knowledge of the relevant business and its Employment Policies, as well as local laws. Therefore, they are best resolved according to the business's own investigative policies and procedures. This Policy does not replace the regular reporting lines or complaints procedures within local operating companies.

Emergencies These should be immediately reported to the relevant local authorities.

# CRH Speak Up Policy cont'd

## II. Ways to Speak Up

CRH has created various means to Speak Up about Reportable Concerns ("Speak Up Reports") and is committed to dealing with any concern appropriately and confidentially.

Regardless of the reporting channel used, all Reportable Concerns should be reported as soon as reasonably possible. There are multiple ways to Speak Up within CRH:

Business Management: Employees are encouraged to Speak Up to the leadership of their local operating company.

Speak Up POC: Certain CRH businesses have identified an internal, impartial, and competent Speak Up Point of Contact ("Speak Up POC"), who is a dedicated resource within the business for receiving Speak Up Reports. These individuals can be contacted by phone, email, or in person. Contact information for each Speak Up POC is provided at Appendix 1.

Fraud POC: If it is a fraud or a theft, there are Fraud Points of Contact that have been identified within the businesses and all actual, suspected or attempted frauds or thefts can be reported to the Fraud Point of Contact.

Hotline: Speak Up Reports can be submitted confidentially, in various languages, by phone or online, to the CRH Hotline: www.crhhotline.com. CRH's Global Head of Compliance and the regional Legal and Compliance teams oversee the intake and investigation assignment of all Speak Up Reports received through the CRH Hotline. The CRH Hotline is hosted by an independent third party. Reporters can monitor the status of the report and communicate with CRH through the Hotline.

Reports can also be submitted anonymously through the CRH Hotline. If the Reporter chooses to be anonymous, no information regarding their identity is collected. Once the report is made, the third party will simply provide CRH with the details given by the Reporter. Upon submitting a report to the CRH Hotline, the Reporter is given a unique ID and password, which can be used to anonymously monitor the status of the report on www.crhhotline.com (or by calling the CRH Hotline again). The ID and password also give the Reporter access to messages from CRH about their report and allow the Reporter to leave anonymous messages as well. This provides a means for ongoing anonymous communication between the Reporter and CRH, which may not be possible when using other reporting channels.

Legal and Compliance: Reporters can also Speak Up to their local Legal and Compliance contact or any of the nominated senior leaders listed below (contact information is provided in Section V).

## III. Our Policy

CRH is committed to:

- Ensuring that anyone with a Reportable Concern has sufficient channels through which to Speak Up in a secure and confidential manner and, if they wish, anonymously
- Identifying competent persons to investigate Speak Up Reports objectively
- Following-up with Speak Up Reporters as appropriate regarding the status of investigation into their Reportable Concern
- Treating all parties involved in a Speak Up Report investigation fairly and respectfully
- Treating Speak Up Reports and investigations with the highest level of confidentiality, as appropriate to the circumstances
- Evaluating the facts established by a Speak Up investigation to determine what, if any, remediation and/or disciplinary action should be considered
- Taking all reasonable steps to protect a Speak Up Reporter and applying a zero-tolerance approach to any retaliation for raising a Reportable Concern in accordance with local laws (note that this does not protect a Speak Up Reporter from any disciplinary action that may be warranted due to their own actions)
- Protecting, as far as possible, sensitive company and personal information that may be disclosed while making a Speak Up Report or in the investigation process (for more information see Speak Up FAQs, Appendix 2)

Any form of retaliation for Speaking Up is a breach of this Policy and CRH's Code of Business Conduct and will be addressed with disciplinary action. Speak Up Reporters will not be punished or suffer any adverse treatment for raising a genuine concern of wrongdoing. However, submitting a knowingly false Speak Up Report will not be tolerated and CRH may take disciplinary action in accordance with local law. Any criminal conduct may be reported to local law enforcement agencies.

## IV. Roles and Responsibilities

**All Employees:**

- Speak Up if they have a Reportable Concern
- Read and understand this Policy
- Participate in any relevant training programme provided

**Business Management*:**

- Lead with integrity and reinforce CRH's values
- Embed a Speak Up culture and create an environment where employees feel comfortable Speaking Up to business management
- Ensure Speak Up posters are displayed at all premises
- Ensure that each Speak Up Report received by the business is investigated by a competent and impartial person ("Speak Up Investigator") and that appropriate action is taken
- Keep the identities of Reporters confidential where practicable
- Enforce proper anti-retaliation policies in accordance with local law
- Take disciplinary action as may be appropriate in the event of retaliation

* Contact Legal and Compliance for additional resources to assist with these responsibilities

# CRH Speak Up Policy cont'd

**Speak Up Investigators:**

- Conduct impartial investigations of all Speak Up Reports that are assigned to them under this Policy
- Keep the identities of Reporters confidential where practicable
- Participate in Speak Up Investigation training
- Along with business management, take necessary measures to enforce proper anti-retaliation policies in accordance with local laws

**Legal and Compliance:**

- Oversee this Policy, including but not limited to:
  - Working with business management throughout the organisation on applying this Policy (with the support of Internal Audit and Security as needed)
  - Monitoring intake and investigation assignment of all Speak Up Reports received through the CRH Hotline
  - Providing legal advice, compliance assessments, and training programmes

Notwithstanding anything in this policy, CRH reserves the right to vary its approach taking into account the circumstances of the report and local laws.

## V. Relevant Contact Details

In the event of any questions regarding this Policy, please contact your local Legal and Compliance contact or any of those listed below.

| Responsibility | Name | Email |
|---|---|---|
| Legal & Compliance | | |
| Global Head of Compliance | Elizabeth Upton | eupton@crh.com |
| Europe/Asia – Compliance Manager | Barbara Przedpelska | bprzedpelska@crh.com |
| North America – Compliance Manager | Martha Burke | martha.burke@crh.com |
| Europe/Asia – General Counsel | Niamh Flood | nflood@crh.com |
| North America – Vice President & General Counsel | Dave Toolan | david.toolan@crh.com |
| Internal Audit | | |
| Head of Internal Audit | Herbie Graham | hgraham@crh.com |
| Europe/Asia – Director of Internal Audit | Grant Hourigan | ghourigan@crh.com |
| Security | | |
| Global Head of Security | Mark Wolsey | mwolsey@crh.com |
| Europe/Asia – Director of Security | Steve Barry | sbarry@crh.com |
| North America – Director of Security | Cindy Coppola | cindy.coppola@crh.com |

## VI. Supplementary Documentation

- Speak Up Frequently Asked Questions
- Code of Business Conduct

# Appendix 1

## Speak Up Points of Contact

| Location | Country | Email | Phone Number |
|---|---|---|---|
| Marlux Klaps | Belgium | speakup@marlux.com | +32 479 871 813 |
| Ergon Belgium | Belgium | SpeakUp@crh-sc.be | +32 (03) 490 04 04 |
| Prefaco - Omnidal | Belgium | SpeakUp@crh-sc.be | +32 (03) 490 04 04 |
| Schelfhout | Belgium | SpeakUp@crh-sc.be | +32 (03) 490 04 04 |
| Rudus | Finland | speakup@rudus.fi | +358 204 474 244 |
| EHL | Germany | speakup@ehl.de | +49 (0) 800 222 2375 |
| Ferrobeton | Hungary | speakup@ferrobeton.hu | +36 307 995 774 |
| CRH Stonemasons Way | Ireland | speakup@crh.com | |
| Irish Cement | Ireland | SpeakUp@ICLLimerick.com | +353 61 487 255 |
| Roadstone Limited | Ireland | speakup@roadstone.ie | 14041299 |
| Dycore | Netherlands | SpeakUp@drbg.nl | +31 610 394 820 |
| Polbruk | Poland | speakup@polbruk.pl | +48 451 151 809 |
| Halfen Produkcja Sp. Z o.o - Nowe Skalmierzyce | Poland | speakup.pl@leviat.com | |
| Ozarów Group | Poland | speakup@ozarow.com.pl | +48 451 169 627 |
| Trzuskawica | Poland | speakup@trzuskawica.pl | +48 789 125 730 |
| Elpreco | Romania | SpeakUp@elpreco.ro | +40 756 151 864 |
| ROMCIM | Romania | SpeakUp@romcim.ro | +40 756 151 864 |
| CRH Slovakia | Slovakia | SpeakUp@danucem.com | +421 (0) 800 174 183 |
| Jura | Switzerland | SpeakUp@juramaterials.ch | +41 792 240 902 |