



Heidelberg Materials

**Climate Advocacy and
Association Review 2023**

December 2023



1. Introduction

Global climate change is one of the biggest challenges for society. As an energy-intensive company, Heidelberg Materials recognises its responsibility to continuously reduce the carbon footprint of our production processes and we are committed to achieve net-zero carbon emissions by 2050, according to the definition of the Science Based Targets initiative (SBTi). We support the aim of the UNFCCC Paris Agreement to limit global warming to 1.5°C. In addition, Heidelberg Materials has set itself the target to reduce the CO₂ emissions of its products by almost half per tonne of cementitious material by 2030, compared to 1990, which is the sector's most ambitious target globally. We also committed to capture and store 10 million tonnes of CO₂ cumulatively until 2030. In November 2023, Heidelberg Materials launched evoZero®, the world's first net-zero carbon captured cement. evoBuild® our globally unified product line for sustainable construction, was introduced in January 2024.

To achieve our goal of net-zero emissions by 2050, Heidelberg Materials cooperates proactively with associations, policymakers, communities, business partners, and other stakeholders to create the appropriate framework conditions to support the implementation of sustainable solutions for climate change mitigation and adaptation.

On a global level, the cement and concrete sector agreed to net-zero carbon emissions by 2050 as laid out by the Roadmap of the Global Cement and Concrete Association (GCCA) published in June 2021. GCCA members account for 80% of the global cement industry volume outside of China and include several large Chinese manufacturers. Thus, the GCCA Roadmap serves as a reference for the climate advocacy of national trade associations, in the case where no such roadmap is yet in place. Being a founding member of GCCA, Heidelberg Materials supports the roadmap in its global advocacy and calls on countries to adopt consistent national strategies.

Heidelberg Materials is a signatory of the global "Business Ambition for 1.5°C Commitment" and a member of the UN "Race to Zero" campaign, underlining our leadership on the road to net zero in the cement industry. Heidelberg Materials was also the first cement company with a 2030 CO₂ reduction target for the 2°C scenario verified by the SBTi. In 2023, our roadmap and targets were validated under the new SBTi 1.5°C pathway scenario for cement, confirming our ambition. We have also submitted our net-zero target for 2050 to SBTi for validation in February 2024.

We attended the 28th UN Climate Change Conference (COP28) in Dubai in December 2023, at which a global review of countries' progress on their emission reduction commitments was carried out for the first time. Importantly, more and more countries and regions are setting themselves the goal of becoming climate neutral and low-emission solutions are becoming increasingly available. However, the global stocktake also found that further action is required to keep the 1.5°C target within reach.

This report covers our climate advocacy and related policy positions, our memberships in associations, their alignment with the Paris Agreement, and how we engage with those associations that are not yet fully aligned. While there is already a strong support for the Paris Agreement in many of the associations, we are a member of, some associations need to take further steps. As Heidelberg Materials, we are committed to leverage our impact to set the sector's associations roadmaps on track to net-zero emissions.



2. Heidelberg Materials statement on climate policy

Heidelberg Materials aims to continuously reduce CO₂ emissions in line with the Paris agreement that aims to limit global warming to 1.5°C. As one of the world's largest construction material companies, we aim to lead the transformation of our sector globally. Our company's commitment to the Paris Agreement is implemented through an internal CO₂ roadmap with country and even plant-specific CO₂ roadmaps. Our remuneration system for local and group management also depends on achieving the assigned CO₂ reduction targets.

We therefore seek and – directly as well as indirectly – advocate for policy frameworks that are aligned with our own climate ambition and targets and meet the goals of the Paris agreement. Such frameworks must promote innovative low-emission building materials, processes, and business models that foster the transition towards a net-zero society while also strengthening industrial competitiveness. Innovation should also be inclusive towards all promising technologies.

Our commitment to the Paris agreement and our recently updated Group Climate Policy are binding and applicable company-wide and guide all our advocacy activities in the markets we operate in. This includes our direct political engagements as well as broader stakeholder outreach with associations, international and societal organisations, communities, and sectoral business partners.

2.1 Our goals and commitments:

Heidelberg Materials communicated the following climate-related commitments:

- Our goal is to achieve a specific CO₂ emission value of 400 kg per tonne of cementitious material by 2030, the most ambitious Scope 1 target in our industry. Compared with the base year 1990, this corresponds to a reduction of almost 50%. By 2050, at the latest, we aim to achieve net-zero carbon emissions (based on SBTi definition).
- We report on our CO₂ emissions in accordance with the reporting guidelines of the GCCA and the Global Reporting Initiative (GRI). We also actively supported the development of a 1.5°C roadmap and meaningful criteria for the cement industry by SBTi.
- We have also committed to reducing its Scope 2 CO₂ emissions - indirect emissions from purchased energy - by 65% per tonne of cementitious material between 2020 and 2030. Concerning our energy use, one of our sub-targets is to increase the proportion of alternative fuels in the fuel mix to 45% by 2030.
- As part of the SBTi validation, we have set ourselves the target to reduce our absolute Scope 3 CO₂ emissions from purchased goods and services by 25% by 2030 compared with 2020.
- We further aim to close the carbon and materials loop. By 2030, we will increase our revenue from low-carbon and circular products with the aim to reach 50% of Group revenue. By the same year, we will also offer circular alternatives for 50% of our concrete products.



3. Transparency in our climate-related advocacy activities

Heidelberg Materials recognizes the importance of carrying out political engagements in a fair and transparent manner and pursues a constructive dialogue with political stakeholders.

To foster transparency, we report on our activities and publish the names of our representatives in applicable transparency registers and support the implementation of such registers in jurisdictions which have not yet done so. The registers also provide further information, a. o. about meetings conducted and input to public consultations.

- [EU Transparency Register \(europa.eu\)](https://european-council.europa.eu/media/en/press-room/pages/press-room-detail.aspx?lang=en&id=123456789) / Identification number in the register: 81970148701-15
- [Registereintrag "HeidelbergCement AG" - Lobbyregister beim Deutschen Bundestag](#)

We conduct any political engagement in compliance with our own Code of Business Conduct and other company policies, such as our Climate Policy, Data Protection Policy, Compliance Policy as well as our Anti-Corruption Guidelines. All documents, including our policy positions, can be found under: [ESG Documents and Policies | Heidelberg Materials](#).

Representatives of Heidelberg Materials will always identify themselves by name and affiliation when acting on behalf of the company. Our representatives will always provide facts-based and accurate information during political engagements.

Direct exchange with political decision makers and non-governmental stakeholders

In 2023, we have continued our direct lobbying activities at global, regional, and national level in alignment with our ambition to lead the sector's industrial transition towards net zero. To facilitate direct dialogue between political decision makers and contact partners within the company, we supplement Heidelberg Materials' indirect representation by associations with company representative offices in Berlin, Brussels, and Washington.

Through numerous talks, events, presentations, and panel discussions in 2023, we were thus able to demonstrate once again how Heidelberg Materials, as one of the world's leading building materials companies, can make an active contribution to solving current challenges. In particular, we advocate for a coherent and supportive framework for the decarbonisation of the industrial sector. We believe that, in addition to ambitious carbon pricing, this also encompasses the expansion of renewable energies under economically viable conditions and improved access to alternative fuels, including waste-based biomass. We support the implementation of reliable frameworks for CCUS and the associated development of infrastructure for the transport and storage of CO₂. We also call for solutions to support a closed-loop circular economy, such as the targeted processing and reuse of construction and demolition waste. In order to create a market for low-emission products, we are in favour of creating green lead markets and developing the necessary internationally compatible standards. We also stress the importance of state funding, which large-scale CCUS projects in particular require during a transition period, as many projects are not yet economically viable at this stage of the transformation.



At global level, we attended – amongst others – COP28, with our Group Chief Sustainability Officer participating in various panels and forums. At the conference, GCCA welcomed the first international agreement to transition away from fossil fuels signed by 200 countries. We supported their ‘Concrete Future Pavilion’, including an own event on driving demand for low-carbon cement and concrete. Heidelberg Materials further engaged and shaped discussions on industry decarbonisation with international institutions and initiatives, such as the UN Industrial Development Organisation (UNIDO), Clean Energy Ministerial (CEM), the World Green Building Council (WGBC), the International Energy Agency (IEA) as well as the Leadership Group for Industrial Decarbonisation (LeadIT). Acknowledging that the demand for low-carbon products is a key enabler for net-zero production processes, Heidelberg Materials supports green lead market and buyers-driven initiatives at global and regional levels, such as the First Movers Coalition.

In Europe, we supported final agreements on the revision of the Emission Trading Scheme and first-ever introduction of a Cross-border Adjustment Mechanism (CBAM) as well as the development of the Net-Zero Industry Act (NZIA) and Industrial Carbon Management Strategies. We also actively advocated for financial support for the deployment of large-scale decarbonisation projects, roll-out of infrastructure, and an increased use of circular industrial solutions.



4. Our engagement in trade associations

Heidelberg Materials engages in most countries where we have operations with national trade associations and is member of these with only few exceptions. We pursue strong and broad engagement within these associations and thus are represented at the level of presidents/chairpersons, board members, working group chairs, and working group members. We also actively participate in ad-hoc working groups or taskforces. Our contribution ranges from clearly advocating for working priorities of these associations to supporting position papers and proactively engaging in discussions. Our Managing Board member for Europe Jon Morrish became vice president of the European Cement Association Cembureau in 2023 and our CEO Dr Dominik von Achten is board member of the Global Cement and Concrete Association (GCCA). Most country managers are engaged in national associations and take roles such as e.g., member of the board of directors, president, or chairperson.

4.1 Association Governance

As a company, we have established governance structures that assign responsibility for sustainability and climate protection, including target achievement, to the Chief Sustainability Officer (CSO) and member of the Managing Board. We set up a clear roadmap for all our operations how to reduce CO₂ emissions. The progress is tracked and overseen by the Senior Management and responsible Board Members. Operational responsibility for implementing the sustainability and climate protection goals of Heidelberg Materials lies with the respective country management teams. Hence, engagement in national associations is key to help set the framework conditions for a successful transition of our sector.

Heidelberg Materials has a strong association management with a global function to provide continuous oversight over industry association advocacy. It confirms alignment with our positions and helps to ensure that our commitment to responsible and constructive advocacy is shared by the associations of which we are a member. A regular exchange with company representatives in trade associations has been established to ensure the associations' lobbying is in line with the goals of the Paris Agreement. The alignment of trade associations with goals of the Paris Agreement is quarterly reviewed with the Chief Sustainability Officer (CSO) and the board member responsible for associations.

Based on our climate commitments and Group Climate Policy, we seek alignment of associations with two of our main advocacy principles:

- Full support for the Paris Agreement and its targets,
- Policies that support meeting our CO₂ reduction target for 2030 and that enable a transition to net-zero by 2050 at the latest.

Heidelberg Materials supports and advocates these principles in our trade associations based on four pillars:

1. Review the association's policy statements and positions and ensure those are aligned with the Paris agreement as included in our Group climate policy.
2. Review policy priorities and the work of associations to ensure that positive and pro-active positions are taken which support a net-zero transition. As the current political framework needs to be adapted

to enable the industry's transition toward net zero, it is in the interest of our company that trade



associations advocate in line with the goals of the Paris Agreement.

3. Continuously highlight and reinforce the need for an ambitious climate policy and commitment to achieve the goals of the Paris Agreement at all levels of engagement with the association and at main gatherings and public events.
4. Heidelberg Materials' representatives within the associations are asked to clearly communicate expectations, take the appropriate measures if these are not being met, and report any major misconduct. All representatives are encouraged to take an active position within the association.

In 2023, Heidelberg Materials financially contributed to trade associations with an estimated amount of €15.5 million globally. Thereof these associations used around €3.3 million for lobbying activities. Contributions include Heidelberg Materials' memberships in cement, aggregates, and ready-mixed concrete associations. The largest financial contributions in 2023 were made to the German, French & U.S. cement trade associations (i.e. VDZ, France Ciment, PCA). On direct political engagements, the company spent a total of approx. €2 million for the same period. The company does not financially contribute to political parties, campaigns, or referendums.

4.2 Methodology of reviewing our engagement in Association

We are reviewing our engagement in national trade associations annually and pay special attention to key countries. A focus is placed on associations in which we have direct membership and thus greater impact on their positioning. Additionally, the review includes a global and a European association, each related to cement production.

In contrast to our 2022 Climate Advocacy & Association Review, in 2023, we extended our review from cement trade associations to aggregates and ready-mix concrete associations.

It was checked whether a trade association's lobbying is aligned with the goals of the Paris Agreement or not. Based on internal desk top research, a pre-assessment of the fulfilment of the criteria was conducted. Representatives of Heidelberg Materials in the national trade associations were consulted to confirm, substantiate, or further elaborate and revise the initial assessment. This information was again cross-checked through the Group Association Management. In case of uncertainties, the country representatives were consulted in a second or even third review round. The CSO and responsible Managing Board Member for Associations supervised the progress and approved the outcome.

Given their relevance for global greenhouse gas emissions, cement trade associations were additionally assessed more in detail. It was examined whether they (1) are aligned with the Paris Agreement (2) have a corresponding CO₂ roadmap, (3) advocate for (the introduction of) carbon pricing, (4) advocate for the support of advanced technologies, e.g. CCUS; (5) advocate for the support of low-carbon products, (6) and advocate for the support of renewable energies.

The cement trade associations' alignment was then categorised based on the outcome of the assessment of the six main criteria:

- **Fully aligned:** The Association meets all 6 defined criteria.
- **Partially misaligned:** The Association meets between 1 to 5 of the defined criteria.
- **Misaligned:** The Association does not meet any of the 6 defined criteria.



4.3 Findings of the Association Review and actions taken

Out of the 23 reviewed cement trade associations, 15 are fully aligned with the goals of the Paris Agreement according to our methodology. Six associations are partially misaligned, and one association is misaligned with the goals of the Paris Agreement.

The advocacy of almost all ready-mix and aggregates trade associations covered in this review are consistent with the Heidelberg Materials' position on climate.

The CSO and the board member for associations is regularly informed about the associations' alignment with the goals of the Paris Agreement and the categories assessed. Country managers are informed through various levels.

Heidelberg Materials, through its associations, strongly supports the establishment of national CO₂ roadmaps, which set out pathways to achieve net-zero emissions, in line with the Paris Agreement, and which outline the necessary measures and instruments to achieve this. For instance, we encouraged the GCCA to roll out their Net Zero Accelerator Programme in Thailand, Egypt, Morocco, India, Indonesia, Tanzania, and Ghana. The Accelerator Programme supports regional trade associations to translate the GCCA's Global CO₂ Roadmap into national roadmaps. The GCCA CO₂ Roadmap, published in 2021, sets out the pathway for the global cement and concrete sector to reach net-zero emissions by 2050.

Through the European cement association Cembureau, Heidelberg Materials' representatives support the implementation of the Green Deal and a successful decarbonisation of the European cement sector.

The Heidelberg Materials CEO and all members of the Managing Board continuously reinforce our ambition and commitment to achieve the goals of the Paris Agreement at high-level occasions, such as the GCCA's Annual Meeting in June 2023 or at COP28. This serves as a guidance to all our employees and those who represent Heidelberg Materials in trade associations.



| Country / Region | Name | Is the trade association's engagement aligned with the goals of the Paris Agreement? | Does the cement trade association ... | | | | |
|------------------|---|--|--|--|---|--|---|
| | | | ... have a CO2 Roadmap aligned with the Paris Agreement? | ... advocate for (the introduction of) carbon pricing? | ... advocate for the support of advanced technologies, e.g. CCUS? | ... advocate for the support of low-carbon products? | ... advocate for the support of renewable energies? |
| Germany | Verein Deutscher Zementwerke (VDZ) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| France | France Ciment | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Belgium | Febelcem | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Netherlands | Cement and Beton Centrum | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Italy | Italian cement producers association (AITEC) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Poland | Stowarzyszenie Producentów Cementu (SPC) | ✓ | ✗ | ✓ | ✓ | ✓ | ✓ |
| Spain | Oficemen | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| Czech Republic | Svaz výrobců cementu ČR | ✓ | ✓ | ✓ | ✓ | ✓ | ✗ |
| Romania | CIROM (National Association of Cement Producers in Romania) | ✓ | ✗ | ✗ | ✓ | ✗ | ✓ |
| Bulgaria | Bulgarian Association for Cement Industry | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Hungary | Hungarian Cement Concrete and Lime Association, CeMBeton | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| UK | Mineral Products Association (MPA) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| USA | Portland Cement Association (PCA) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Canada | Cement Association of Canada (CAC) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Australia | Cement Concrete & Aggregates Australia (CCAA) | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| Indonesia | Asosiasi Semen Indonesia | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| India | Cement Manufacturers Association (CMA) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Thailand | Thai Cement Manufacturers Association (TCMA) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Morocco | Association Professionnelle des Cimentiers (APC) | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| Egypt | Chamber of Building Materials Industries - Cement Division | ✗ | ✗ | ✗ | ✗ | ✓ | ✓ |
| Ghana | Chamber of Cement Manufacturers Ghana (COCMAG) | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| Global | Global Cement and Concrete Association (GCCA) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Europe | CEMBUREAU | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

Table 1 Review of cement trade associations and their lobbying activities in alignment with the goals of the Paris Agreement.



4.4 Ensuring alignment

Heidelberg Materials will continue to act on the findings raised in this Association Review. Based on the latest standards and best practice, we refine our survey annually. We follow up in case of misalignment, e.g. through bilateral calls with Country Managers.

If an association's position on a strategically important issue differs from ours, we will increase our engagement in the association's committees and signal our dissent to improve the alignment or to demand the association not take a position.

If the association repeatedly pursues policies and actions that are contrary to Heidelberg Materials' positions or if reasonable measures to advance the goals of the Paris Agreement are repeatedly opposed, we will publicly state our disagreement, assess the association's performance and its membership value, and finally review if exiting the association is appropriate. We believe exiting an association is only appropriate as a last resort since aligning positions as a sector or industry across companies and associations is a precondition for achieving a net-zero economy.

Given the climate ambition of Heidelberg Materials we have a vested interest to continuously engage with our associations to align their lobbying activities with the goals of the Paris Agreement.



ANNEX – Climate Policy positions

Carbon pricing

The transformation towards net-zero will require significant investments along the entire value chain sustainable construction value chain. When designed in the right way, carbon pricing can be an effective instrument to incentivize emission reductions, as it internalizes external carbon cost and incentivizes investment in emission reduction.

- Price signals need to be reliable and allow carbon-neutral production to become a business case. Speculation in the market and high price volatility needs to be avoided.
- Cost-effective carbon pricing systems should consider sectoral starting points and abatement costs to ensure emissions will fall below predetermined emissions targets.
- A global framework is the best option to ensure a global level playing field. In absence of a global carbon price, national or regional carbon pricing schemes can also be effective but need to be combined with carbon leakage protection to negative competitive effects. The EU proposal for a carbon-border adjustment mechanism is an example.
- In addition, these instruments must be accompanied by demand side measures to ensure the update of low-emission and net zero products.

Carbon capture, utilisation, and storage (CCUS)

Two thirds of direct emissions in cement production are unavoidable process emissions from calcinating limestone during the clinker production process. Carbon capture, utilisation and storage technologies are one of the main current solutions to deal with unavoidable process emissions and must therefore be industrialised and deployed at large scale.

- The fast development of national and international CO₂ transport infrastructures (ships, railway, pipelines) connecting emission sources with storage sites, also those in inland locations, is a necessary precondition for CCUS. Infrastructure planning and coordination should therefore be a priority for political decisionmakers.
- Public financial support for the deployment of large-scale CCUS technologies needs to be ensured. This must include support for capital investments as well as increased operational costs, through instruments such as Carbon Contracts for Difference.
- Further recognition of CCUS technologies in carbon accounting. Acknowledging emissions avoidance resulting from CCU and Bio-CCS in carbon pricing schemes should be implemented to incentivise their application. In addition, the capture and storage of biogenic carbon emissions enables negative emission capabilities to offset residual emissions that should also be recognised, e.g. through issuing tradeable negative emissions certificates in carbon pricing schemes. To optimise the impact of negative emissions and leverage synergies resulting in reduced cost, alternative fuels with high biomass-content should be routed towards industrial high temperature processes.

Lead markets for low carbon & circular products

Already today, Heidelberg Materials can offer low-carbon construction products with a reduced CO₂ emission footprint of up to 70% or a high content of recycled materials. evoZero and evoBuild complement the picture with a full-range sustainable product portfolio. To become more than a niche, stimulating demand measures will need to be put in place to ensure the uptake of more sustainable construction materials.



- Collaboration is necessary to overcome sector-specific limitations to create and make use of synergies, e.g., to get access to concrete demolition waste.
- Furthermore, users need to be made aware of circular products and their possible applications.
- Revised product and construction norms as well as building codes are needed.
- Implementing fiscal incentives for users or adapt green public procurement schemes considering the full life cycle, recyclability, and performance of products besides the price.

Renewable energy

The transformation process will require the rapid phase out of fossil fuels while, at the same time, climate mitigation technologies, require additional use of renewable energy capacity.

- Policies must be developed that ensure access to sufficient renewable and low-carbon energy at competitive cost. This must include generation capacity as well as relevant networks.
- Co-processing must be recognised as a sustainable method allowing the effective substitution of fossil fuels and primary raw materials with non-recyclable residual and biomass waste.
- Policies should also adopt a coherent biomass and alternative fuel strategy to ensure sustainability criteria are respected while increasing access to waste-based resources. Landfilling should be banned or heavily taxed.

Circularity

Heidelberg Materials goal is to close the carbon and materials cycle. The use of by-products from other industrial sectors for the production of clinker and cement and the recycling of demolition concrete enables us to produce in a more resource-efficient way and with lower CO₂ emissions.

- Rerouting material flows towards circular products should be incentivised by revising demolition waste management regulations, including separation of waste streams on site.
- The market access for circular products needs to be improved by revising product, building and construction norms.
- Demand creation needs to take place for recycled products by adding financial incentives for private customers and by deploying green public procurement schemes, based on a full life-cycle-analysis, considering carbon footprint and other sustainability-related aspects such as recyclability.

Sustainable Finance

An enabling financial framework is needed that rewards investment into industry transformation with better access to finance and lower capital cost.

- Public funding schemes are needed to bridge the breakthrough period for large-scale decarbonisation technologies, such as CCUS.
- State aid guidelines for public funding of low-carbon technologies should enable support for capital and operations costs compensating competitive disadvantages compared to conventional production.
- Taxonomies defining what sustainable business practices are should be aligned globally. To avoid unintended barriers, taxonomy schemes should focus on the end of a product value chain and provide criteria for intermediate solutions based on technology openness.