



Ethics & Compliance

Code of Business Conduct

As members of the HeidelbergCement Group, employees of Lehigh Southwest Cement Company and its affiliated companies in the Lehigh Hanson group in North America are required to comply with HeidelbergCement's "Code of Business Conduct" and the "Group Anticorruption Guideline." Managers have the additional responsibility of fostering a culture in which compliance with the HeidelbergCement policy and applicable law is at the core of our business activities.

Strong ethics and high legal standards in all our business activities are fundamental for the future success of Lehigh Southwest Cement Company and its employees. Click [here](#) for more on HeidelbergCement's Code of Business Conduct.

In North America, employees in the Lehigh Hanson group must also comply with additional policies that supplement the Group Policies and adapt them to the legal environment in North America and, in certain instances, provide more specific compliance direction. These supplemental policies apply to all employees in North America. Read the North American supplemental policy [here](#).

Antitrust Policy

The policy of Lehigh Southwest Cement Company is to compete vigorously and fairly and in compliance with applicable antitrust laws. All Company employees are expected to comply with the antitrust and competition laws and this Policy. No supervisor or management employee has the authority to direct or approve any action by a Company employee in violation of these laws or this Policy. Read Lehigh Hanson's antitrust policy [here](#).

California Transparency in Supply Chains Act Disclosure

The [California Transparency in Supply Chains Act of 2010](#) requires certain retail sellers and manufacturers doing business in California to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale. Lehigh Hanson and its affiliated companies doing business in California, including Lehigh Southwest Cement Company, as well as all other companies making up the HeidelbergCement Group, are committed to complying with international social and environmental standards. These standards are set forth in the HeidelbergCement Group [Sustainability Report](#) and [HeidelbergCement's Supplier Code of Conduct](#).

Almost all of the products sold by Lehigh Southwest Cement Company are produced or manufactured using raw materials and products obtained locally from the company itself, a Lehigh Hanson affiliate, or a third party supplier. Taking into account Company policies, social norms, and federal, state and local laws, it is highly unlikely that slavery or human trafficking is implicated in these local supply chains. The verification of these product supply chains is conducted within the Lehigh Hanson organization.

For the handful of raw materials obtained from foreign suppliers, such as gypsum, iron ore, and bauxite used in manufacturing portland cement, the number of suppliers is small – no more than a dozen or so – and the suppliers can be evaluated for compliance with Company standards on an individual basis without the need for independent, unannounced audits. At times, portland cement is imported from foreign affiliates or a limited number of suppliers. Again, the number of suppliers is small and they can be evaluated for compliance on an individual basis.

In any event, suppliers are bound, directly or indirectly, by the requirements of [HeidelbergCement's Supplier Code of Conduct](#). These requirements are implemented by certifications from direct suppliers and/or contractual provisions in purchase orders or agreements with direct suppliers, all of whom are required to exercise diligence in verifying that the Supplier Code of Conduct is adhered to by their own suppliers.

Employees and managers are subject to discipline, including termination, for failure to abide by Lehigh Hanson policies, including failure to observe Company standards regarding slavery and human trafficking. Contractors and suppliers are subject to having their contracts with Lehigh Southwest Cement Company or Lehigh Hanson terminated should they violate the Supplier Code of Conduct.

The relatively few employees and managers with direct responsibility for supply chain management are in Lehigh Hanson's purchasing department. All of these employees and managers receive regular training in the Lehigh Hanson [Code of Business Conduct](#). Supplemental training on human trafficking and slavery and mitigating risks within the supply chains of products is offered as part of regular meetings of the purchasing department.