



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           |



These should be immediately reported to the relevant local authorities.

## How?

|                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                     |                                                                                                                                                                       |                                                                                                                                                                                                                   |                                                                                                                                                                                                                         |
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| <b>CRH Hotline</b><br><a href="http://www.crhhotline.com">www.crhhotline.com</a><br>Or call the number found on the poster at your site. You can choose to remain anonymous.<br> | <b>Legal and Compliance</b><br>Speak Up to your local Legal and Compliance contact or Group Legal and Compliance team members.<br> | <b>Business Management</b><br>Speak Up to the leadership of your local business.<br> | <b>Speak Up Point of Contact ("POC")</b><br>(where available)<br>Speak Up to the Point of Contact for your local business.<br> | <b>Fraud Point of Contact ("Fraud POC")</b><br>Speak Up about any suspected, attempted, or actual fraud/theft to your Fraud POC.<br> |
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## I. Introduction

CRH is committed to supporting all persons, including current, potential, and former employees, independent contractors, customers, and suppliers in coming forward with genuine concerns of wrongdoing within CRH. This Speak Up Policy (this "Policy") forms part of that commitment and helps you understand how you can make a report.

If a person has a genuine concern of possible wrongdoing relevant to CRH's Code of Business Conduct, inappropriate or illegal behavior, or violations of local laws (generally referred to as a "Reportable Concern"), they should report it under this Policy without fear of retaliation. They should "Speak Up".

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

- **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.
- **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, insider trading or unauthorised use of the Group's confidential information) 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).
- **Unethical behaviour:** any violation of the CRH Code of Business Conduct or other unethical behavior, 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
- Deliberate concealment of any of the above.
- **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 concern or complaint of this nature, it is referred to as an "Employment

Concern". Proper handling of these concerns requires 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 policies and procedures for investigating and resolving such issues. This Policy does not replace the regular reporting lines for complaints within local operating companies for such issues.

# CRH Speak Up Policy continued

## II. Ways to Speak Up

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

- **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 POC, who is a dedicated resource within the business for receiving Speak Up Reports.
- **Fraud POC:** If it is a fraud or a theft, there are Fraud POCs that have been identified within the businesses and all actual, suspected or attempted frauds or thefts can be reported to the Fraud POC.
- **Hotline:** Speak Up Reports can be submitted confidentially, in various languages, by phone or online, to the CRH Hotline: [www.crhhotline.com](http://www.crhhotline.com).

- **Legal and Compliance:** Directly to your local or divisional Legal and Compliance contact or to the Group Legal and Compliance team (contact information is provided in Section V).

The Legal and Compliance team 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 submitted through the CRH Hotline and via other channels can be submitted anonymously. If the Reporter chooses to be anonymous, no information regarding their identity is collected. The Reporter has the option to receive updates on the case by receiving a secure login. This allows them to monitor the case.

Regardless of the reporting channel used, all Reportable Concerns should be reported as soon as reasonably possible.

## 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.
- Ensuring Speak Up Reports are investigated by objective and skilled individuals.
- Following-up with Speak Up Reporters as needed 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 and in accordance with local laws.
- 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 genuine Reportable Concern in accordance with local laws.
- 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).
- CRH does not tolerate retaliation for reporting a genuine concern. The business will investigate any suspected retaliation and take appropriate action, including disciplinary action, as appropriate. If at any time an employee feels they have been retaliated against for reporting a genuine concern, they should contact their local Legal and Compliance contact or [www.crhhotline.com](http://www.crhhotline.com). 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. A Speak Up Reporter may also be subject to disciplinary action resulting from their own, standalone actions, unconnected to making a report.

## IV. Roles and Responsibilities

### Employees Must:

- Speak Up if they have a Reportable Concern.
- Read the Code of Business Conduct and understand the behavior expected of them.
- Read and understand their obligations under this Policy.
- Participate in relevant training programs assigned.

### Company Management Must\*:

- 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 listing the Hotline and, if applicable, local Speak Up POC details 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 and persons named in the reports confidential where practicable and as required by local law.
- Enforce proper anti-retaliation policies in accordance with local law.
- Take disciplinary action as appropriate in the event of retaliation.

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



# CRH Speak Up Policy continued

### Speak Up Investigators:

- Conduct timely and impartial investigations of all Speak Up Reports that are assigned to them under this Policy.
- Keep the identities of Reporters and persons named in the reports confidential where practicable and required by local law.
- 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 organization 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 programs.

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 with regards to the content, context or meaning of this document please contact your local compliance contact, or the Legal and Compliance team.

| Responsibility                         | Name                | Email                                                          | Direct Dial      |
|----------------------------------------|---------------------|----------------------------------------------------------------|------------------|
| <b>Legal &amp; Compliance</b>          |                     |                                                                |                  |
| General Counsel – Corporate            | Aisling McKeown     | <a href="mailto:amckeown@crh.com">amckeown@crh.com</a>         | +353 87 123 9493 |
| General Counsel – CRH International    | Niamh Flood         | <a href="mailto:nflood@crh.com">nflood@crh.com</a>             | +353 87 622 0451 |
| General Counsel – North America        | Dave Toolan         | <a href="mailto:david.toolan@crh.com">david.toolan@crh.com</a> | +1 404 216 8706  |
| Compliance Manager – CRH International | Barbara Przedpelska | <a href="mailto:bprzedpelska@crh.com">bprzedpelska@crh.com</a> | +48 600 806 505  |
| Compliance Manager                     | Martha Burke        | <a href="mailto:martha.burke@crh.com">martha.burke@crh.com</a> | +1 770 392 5306  |

## VI. Supplementary Documentation

- [Speak Up Frequently Asked Questions](#)
- [Code of Business Conduct](#)

