

GLOBAL ENVIRONMENTAL POLICY AND GREEN RULES





For us, sustainability means achieving our growth ambitions, in the following way: taking the present and future needs of society into account; offering eco-efficient and innovative building materials, and services, to our customers; acting in an ethical, transparent manner and in accordance with the laws and regulations; providing a motivating, healthy and safe work environment for our direct and indirect employees; supporting our local communities and encouraging their progress.



“One team, one company” and a commitment: to be a benchmark in sustainability in our industry



We are one of the largest global companies in the civil construction sector. Today we are present in 14 countries, a business environment of different cultures, behaviors and laws. In the midst of this diversity, we seek something that is common to all our operations: sustainable development.

Our vision, which gives overall direction to our operations, is founded on four strategic drivers: Customer Focus; Empowered People; Operational Excellence; and Sustainable Practices. In the case of the latter pillar, we spare no efforts to advance: internally, we work hard to ensure the safety of our employees, reduce our ecological footprint, and use natural resources more efficiently in our operations. Some of the highlights are the use of alternative fuels, the co-processing of waste and the search for more sustainable raw materials for our products. In addition to these initiatives, and in line with our sustainability strategy, we have improved eco-efficiency, through innovative

processes and products, and promoted open dialogue in the communities where we operate. We have established targets for these commitments, in a formal document, and they are presented at the end of this letter. To ensure that we all follow the same path in our activities, we must pay attention to a set of policies and rules that lead us to use best practices.

This booklet was developed to present our Global Environmental Policy, which is designed to guide our efforts in sustainable development and is based on nine principles. From these nine principles, we also developed the 10 Green Rules to facilitate the understanding of the policy and the process of its communication to all employees. I count on your support to disseminate and implement our Global Environmental Policy, and ensure that we comply with it in all our activities.

Good reading!

Walter Dissinger
CEO Votorantim Cimentos



WHAT IS EXPECTED FROM EACH ONE OF US



COMPLY

with the commitments of this policy

COMMUNICATE

any violations of this policy to your manager or the Ombudsman channel

CONTRIBUTE

actively to fulfill these commitments in your unit



REFUSE

activities that are in disagreement with this policy, and impact the environment. Report any occurrences.

RECOGNIZE

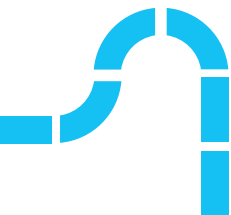
desired environmental behavior and correct unwanted behavior.

Internal Committee for Energy and Water Conservation composed of volunteer employees from our Rio Branco Unit – Paraná state – Brazil



REFUSE TO PERFORM AN ACTIVITY THAT IS CONTRARY TO THIS ENVIRONMENTAL POLICY OR THE GREEN RULES IS A RIGHT AND A DUTY OF ALL OUR EMPLOYEES.

OUR ENVIRONMENTAL POLICY PRINCIPLES



1

Always comply with the **legal requirements, standards and regulations** applicable to the organization and the voluntary commitments it has subscribed to.

2

Implement and maintain an **Environmental Management System**, appropriate to our nature, scale and the environmental impacts of our activities, products and services, to ensure compliance with our commitments, focusing on **continuous improvement** and **pollution prevention**.

3

Ensure the eco-efficient and responsible **use of natural resources** to reduce the consumption of fossil fuels, raw materials, water, energy and others inputs.

4

Address the challenges of **climate change** by developing a strategy for reducing greenhouse gas emissions. Focus on the use of low-carbon, alternative fuels, the **responsible use of fuels and raw materials** and the efficient use of energy and resources.

5

Define and implement environmental standards to assess and monitor **atmospheric emissions** and set reduction targets.



Yozgat Unit - Turkey

6

Minimize the generation of **waste**. Reduce consumption, reuse and recycle materials when possible and dispose of waste appropriately and responsibly.

7

Assess, control and reduce the **environmental impacts** of our activities, focusing on continuous improvement and **best industry practices**. Invest in environmental **innovation** in our processes, products and services throughout the life-cycle, seeking to reduce our environmental impacts.

8

Develop **rehabilitation and closure plans** for all our active mining operations, considering stakeholders' expectations. Continuous monitoring and reporting of our **biodiversity performance**, focusing on conservation and increasing awareness.

9

Promote **ethical and transparent relations** with our stakeholders, by providing environmental information about our operations and products on a regular basis and maintaining a process of dialogue which is open.

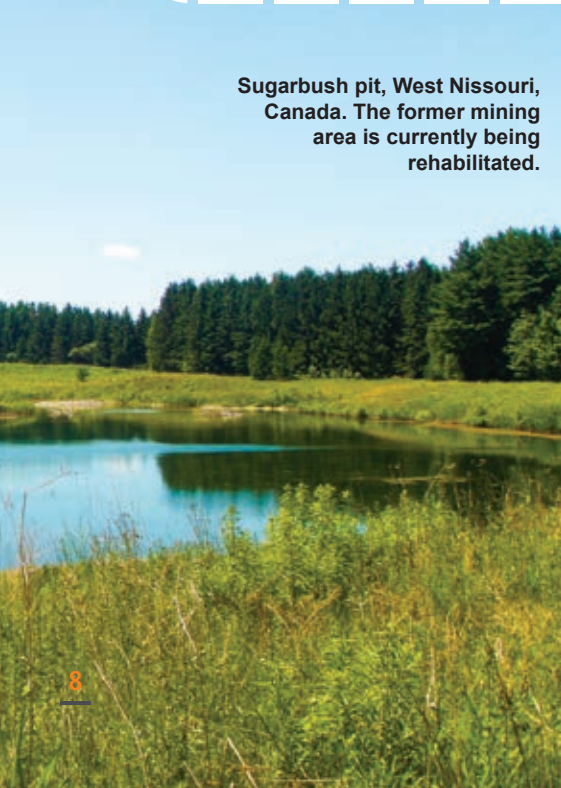




Tombador Waterfall Nature Reserve recognized as a Private Natural Heritage Reserve – Nobres Unit – Mato Grosso State – Brazil



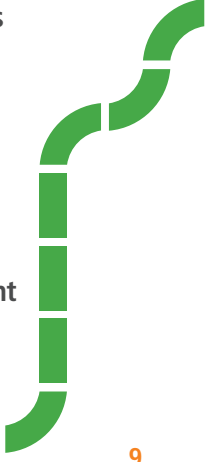
GREEN RULES



Sugarbush pit, West Nissouri, Canada. The former mining area is currently being rehabilitated.

The Green Rules were developed based on our Environmental Policy principles to facilitate the understanding and dissemination of the Policy to all employees.

- 1**  Protect and respect the natural environment – air, land and water
- 2**  Protect Biodiversity – flora and fauna
- 3**  Minimize the generation of waste – reuse, recycling and responsible waste disposal
- 4**  Maximize energy efficiency and reduce greenhouse gas emissions – production, transportation and support operations
- 5**  Continuously monitor environmental impacts and develop a plan to define reduction targets
- 6**  Commit to using the highest level of pollution control technology whenever possible
- 7**  Respect caves and cultural, geological, historical, archeological and paleontological sites
- 8**  Maintain a process of open dialogue. Respect neighbors and stakeholders
- 9**  Reduce the use of virgin raw materials whenever possible. Maximize the efficient and responsible use of resources
- 10**  Rehabilitate company sites – during operations and post-closure



1 PROTECT AND RESPECT THE ENVIRONMENT – AIR, LAND AND WATER

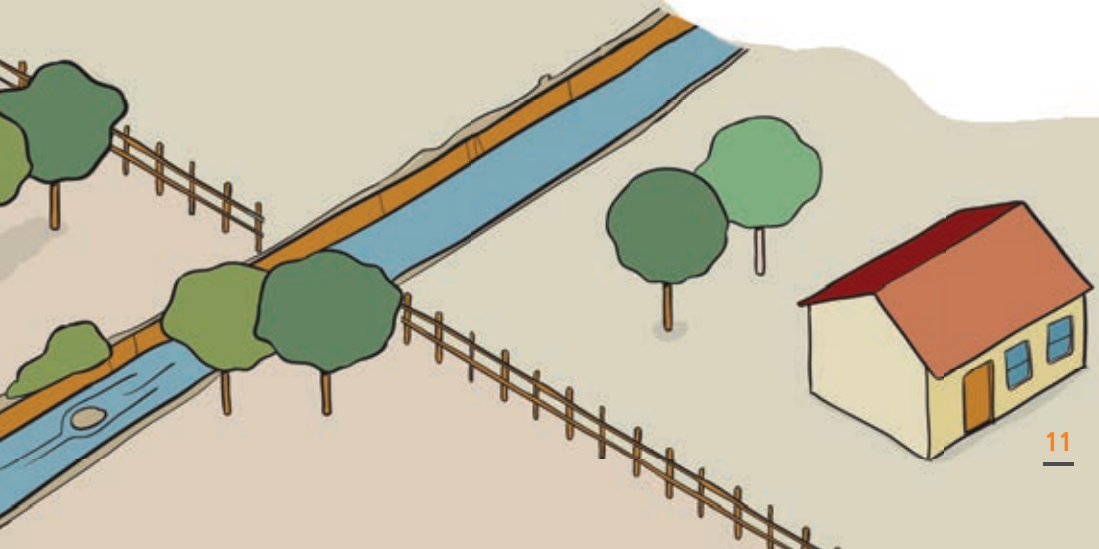
Caring for the environment is like taking care of our home. We must protect the air, water and soil, respect and preserve the natural environment for this and future generations. We have a duty to communicate and mitigate any operational problem that may cause pollution and find alternatives to reduce environmental impacts and improve environmental quality.





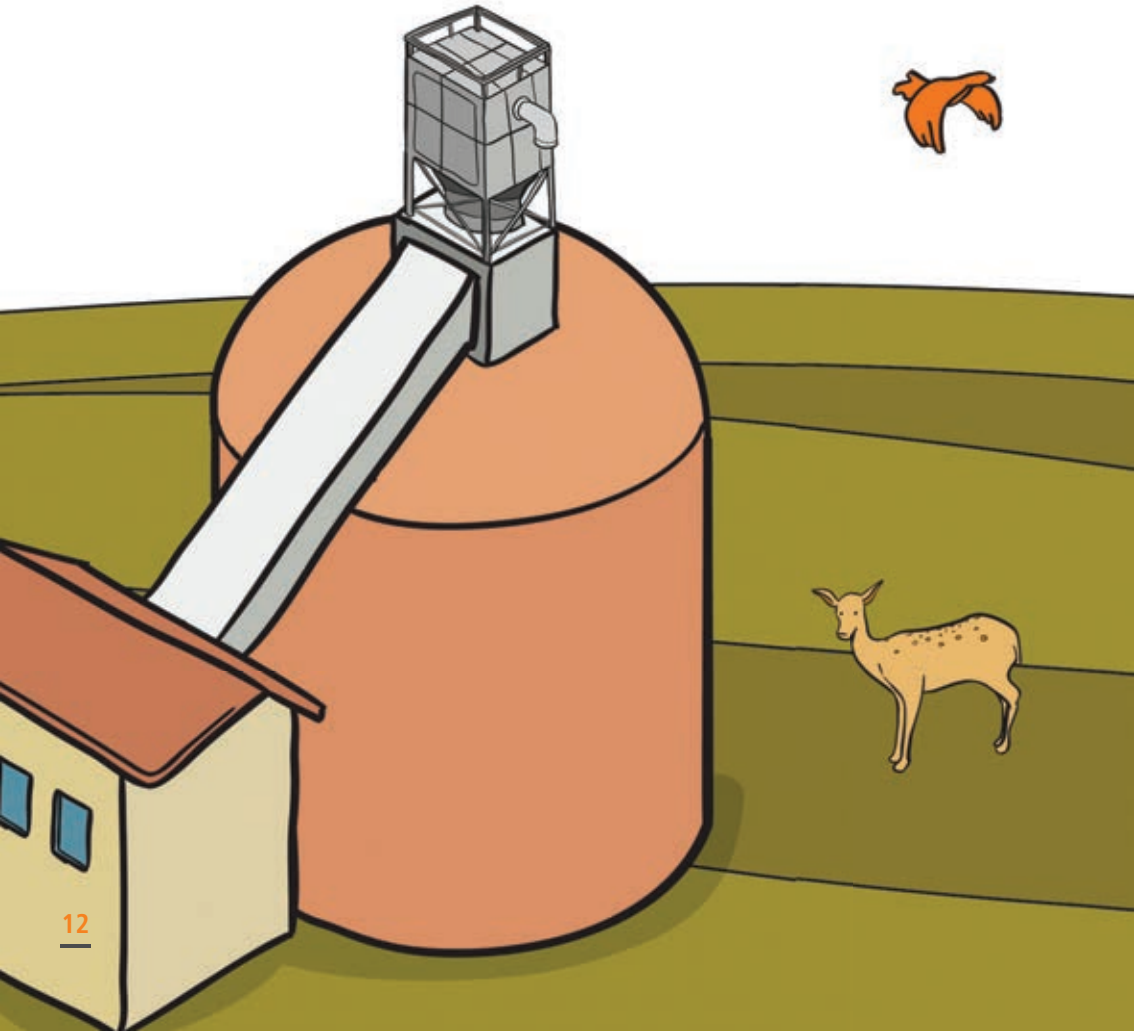
HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ◊ Look out for initiatives, together with other employees, NGOs, government agencies, community, etc., that focus on environmental improvements. Suggest and implement ideas for continuous improvement. Ex:
 - Capture of rain water,
 - Water reuse,
 - Reduction of waste generation,
 - Reduction of energy consumption, etc.
- ◊ Do not mine or store raw materials in unauthorized areas
- ◊ Communicate and mitigate any operational problem that could cause pollution
- ◊ Do not burn vegetation
- ◊ Keep lights out and computers turned off when not in use
- ◊ Avoid the unnecessary printing of documents, especially in color.
- ◊ Do not discharge any type of material or effluent into rainwater drainage systems, rivers, streams or lakes without treatment or authorization.
- ◊ Withdraw water from rivers, streams or ponds only with the permission of the responsible authority.
- ◊ Ensure the proper treatment of all effluent before discharging into rivers, streams or creeks.
- ◊ Use water responsibly and guide others to do the same.



2 PROTECT BIODIVERSITY – FLORA AND FAUNA

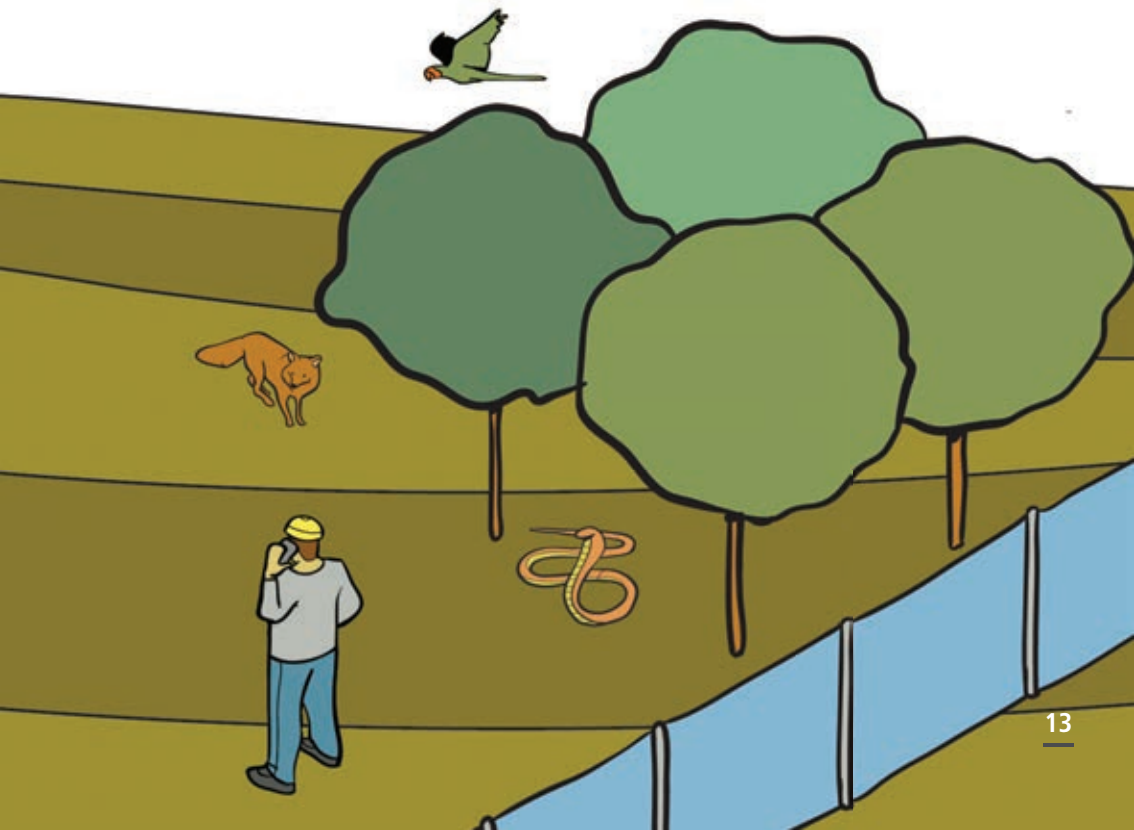
Caring for flora and fauna is everyone's duty. The removal of trees should be done only with the appropriate permission. Wildlife and their habitats must be protected in accordance with local regulations. Whenever possible, try to engage in projects for surveying and protecting species.





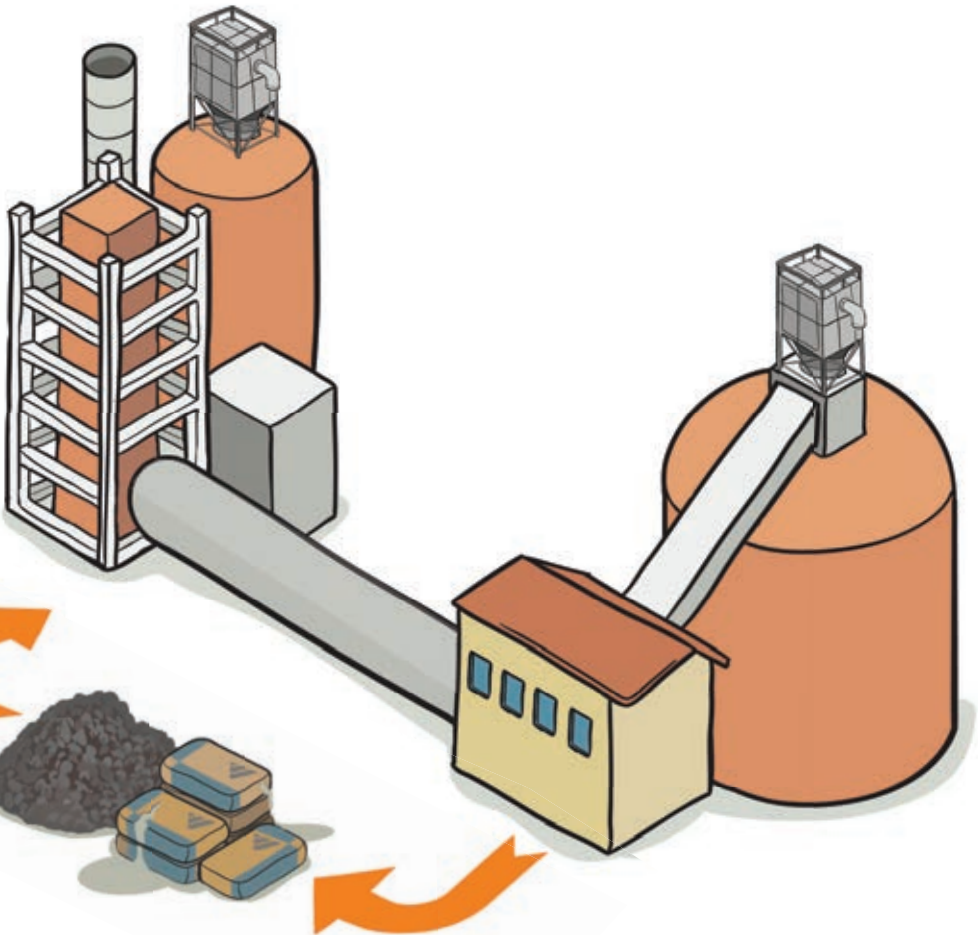
HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ❖ Find out about the protected areas in your unit and help preserve them by avoiding carrying out activities in them and by implementing biodiversity protection initiatives in a pro-active manner.
- ❖ Preservation areas must be clearly defined and identified.
- ❖ Cut down trees only with permission of the competent authority and your unit's environmental area and seek ways to compensate, for example, by planting trees in suitable locations.
- ❖ Identify areas of high biodiversity importance and view them as being the company's environmental assets.
- ❖ Protect wild animals and their habitats. Do not mistreat or trap animals.



3 MINIMIZE THE GENERATION OF WASTE – REUSE, RECYCLING AND RESPONSIBLE DISPOSAL

Identify and quantify the types of waste generated and separate them appropriately. Minimize the generation of hazardous and non-hazardous waste, reuse and recycle materials where feasible and dispose of them according to the most responsible environmental methods available.





HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ❖ Look for initiatives to reduce the generation of internal waste.
- ❖ Encourage initiatives which add value to waste and contribute to local development.
- ❖ Respect the hierarchy of procedures for waste disposal.
- ❖ Whenever possible, try to reuse materials, but always be careful to do so safely and responsibly.
- ❖ Disposing of the waste generated in your area in the appropriate places, according to the color codes for selective collection. This is critical to ensuring the proper final disposal and recycling of uncontaminated waste.
- ❖ Reuse process waste in the production process (partially burned clinker, rejected intermediate and final products, unused concrete, etc.).
- ❖ Do not rule out waste on the overburden pile at the quarry.

Waste hierarchy destination



Beneficial use
of materials
and energy



Source: This is an adaptation of a figure from the CSI Guidelines for Co-Processing Fuels and Raw Materials in Cement Manufacturing (Version 2.0, 2014, Page 5, Figure 1) published by the World Business Council for Sustainable Development (WBCSD).

4 MAXIMIZE ENERGY EFFICIENCY AND REDUCE GREENHOUSE GAS EMISSIONS – PRODUCTION, TRANSPORTATION, AND SUPPORT OPERATIONS

Continually seek alternatives for fuel and raw materials; promote the efficient use of energy; ensure compliance with the procedures for accepting waste; ensure the proper maintenance of vehicles and equipment.

HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ❖ Look for initiatives to improve the energy efficiency of equipment and processes, for example, through participation in the Internal Committees for Energy and Water Conservation.
- ❖ Identify alternative options for fuel and raw materials in your region and suggest the carrying out of feasibility tests.
- ❖ Use alternative forms of transportation with lower carbon emissions.
- ❖ Ensure compliance with the procedure for accepting waste for co-processing. Use only the formally approved types of waste and in accordance with the standards of environmental and occupational safety. Store and handle waste in a safe and environmentally responsible manner.
- ❖ Carry out the periodic maintenance of equipment and vehicles and make the necessary changes to ensure their proper functioning.
- ❖ Operate equipment and vehicles properly, according to manufacturer's guidelines, monitor emissions in accordance with the local legislation.
- ❖ Ensure that our product remains within its specifications or even improves its performance when produced using co-processing or cementitious materials.





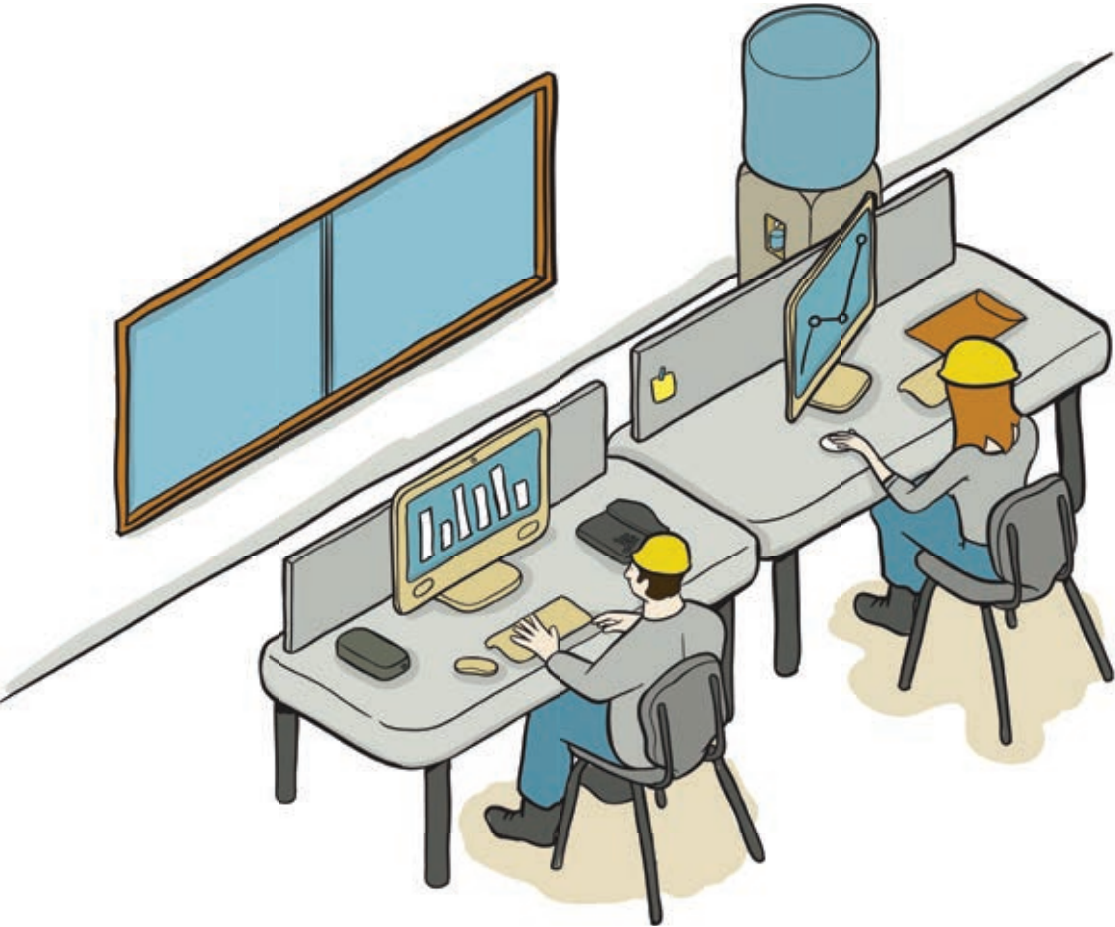
5 CONTINUOUSLY MONITOR ENVIRONMENTAL IMPACTS AND DEVELOP A PLAN TO DEFINE REDUCTION TARGETS

Identify the environmental impacts of your area and unit. Monitor and define targets to address them, seeking continuous improvement.

HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ❖ Look for tools that help to manage the impacts of your area.
- ❖ Take preventive measures to avoid the occurrence of environmental damage.
- ❖ Carry out the proper maintenance of equipment.
- ❖ Find out about the environmental issues and impacts of your units activities and try to minimize them jointly with other areas.
- ❖ Create action plans and implement them for effective mitigation.



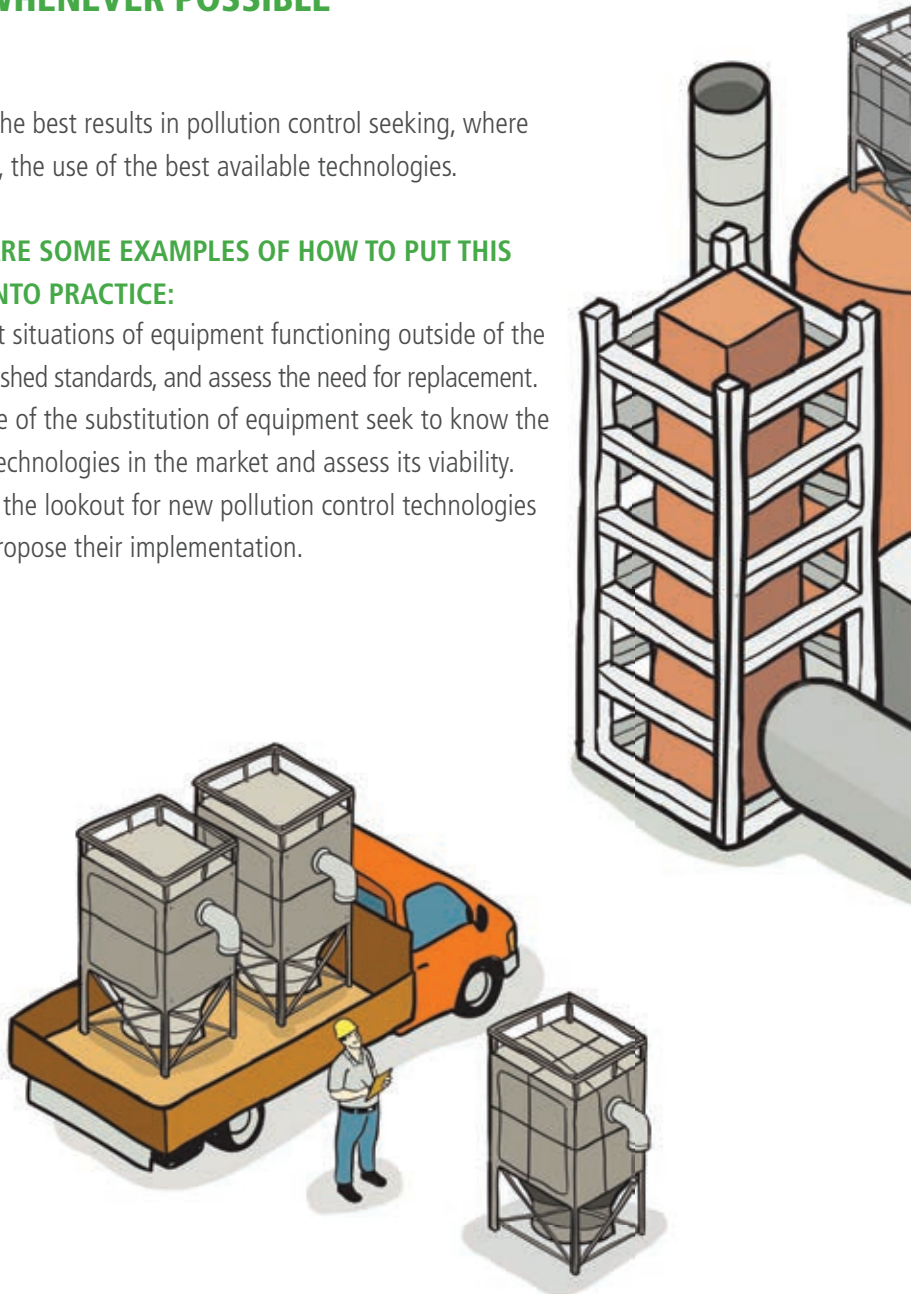


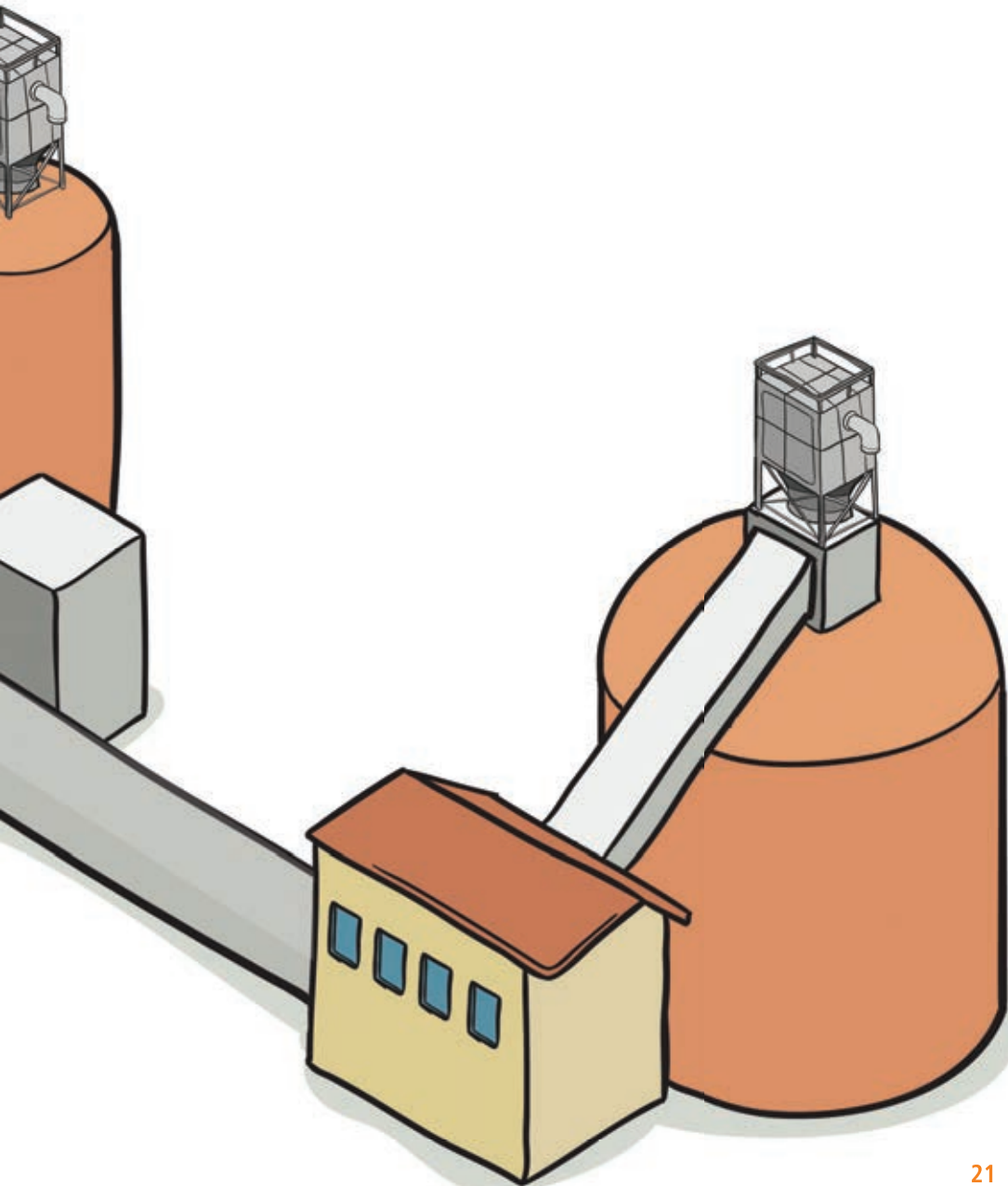
6 COMMIT TO USING THE HIGHEST LEVEL OF POLLUTION CONTROL TECHNOLOGY WHENEVER POSSIBLE

Ensure the best results in pollution control seeking, where possible, the use of the best available technologies.

HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

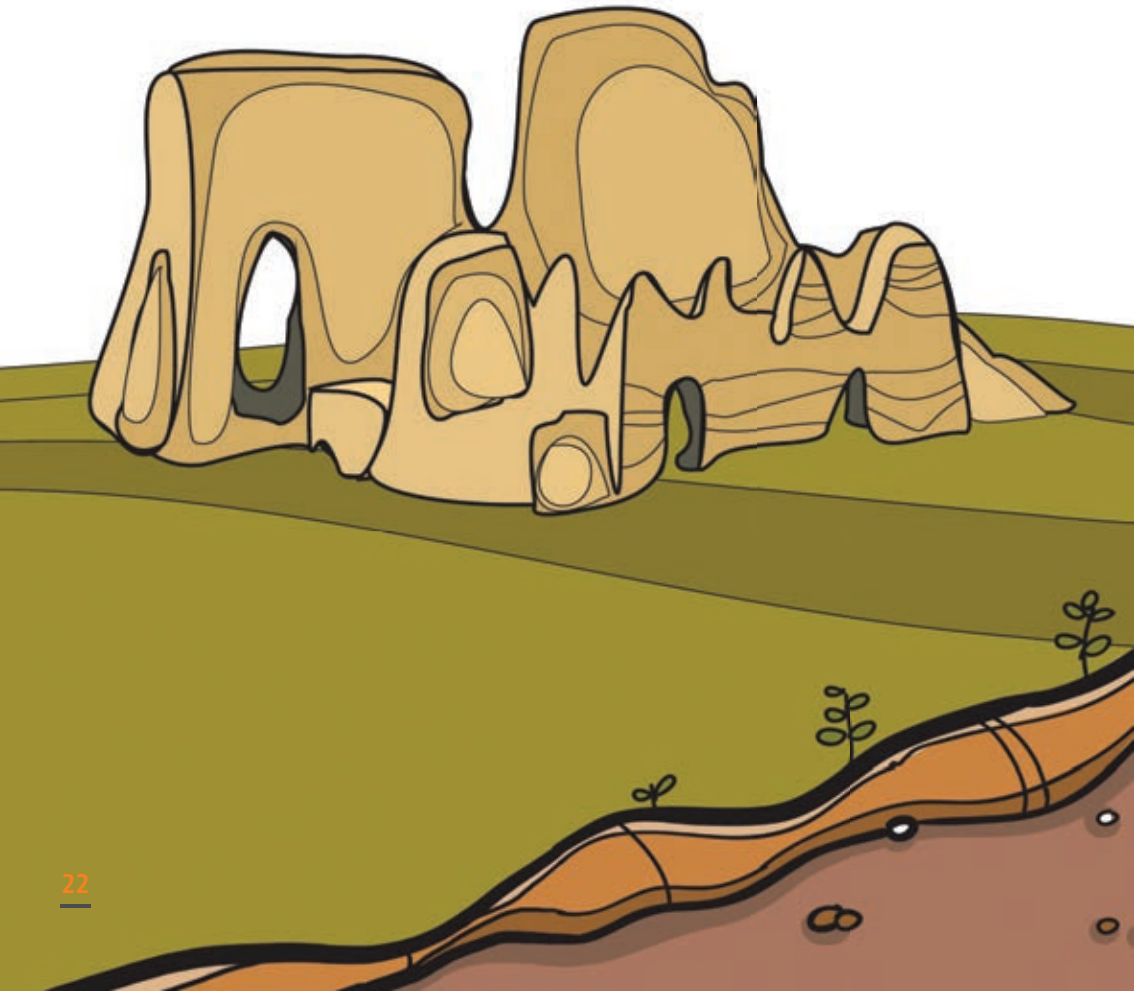
- ❖ Report situations of equipment functioning outside of the established standards, and assess the need for replacement.
- ❖ In case of the substitution of equipment seek to know the best technologies in the market and assess its viability.
- ❖ Be on the lookout for new pollution control technologies and propose their implementation.





7 RESPECT CAVES, AND CULTURAL, HISTORICAL, GEOLOGICAL, ARCHEOLOGICAL AND PALEONTOLOGICAL SITES

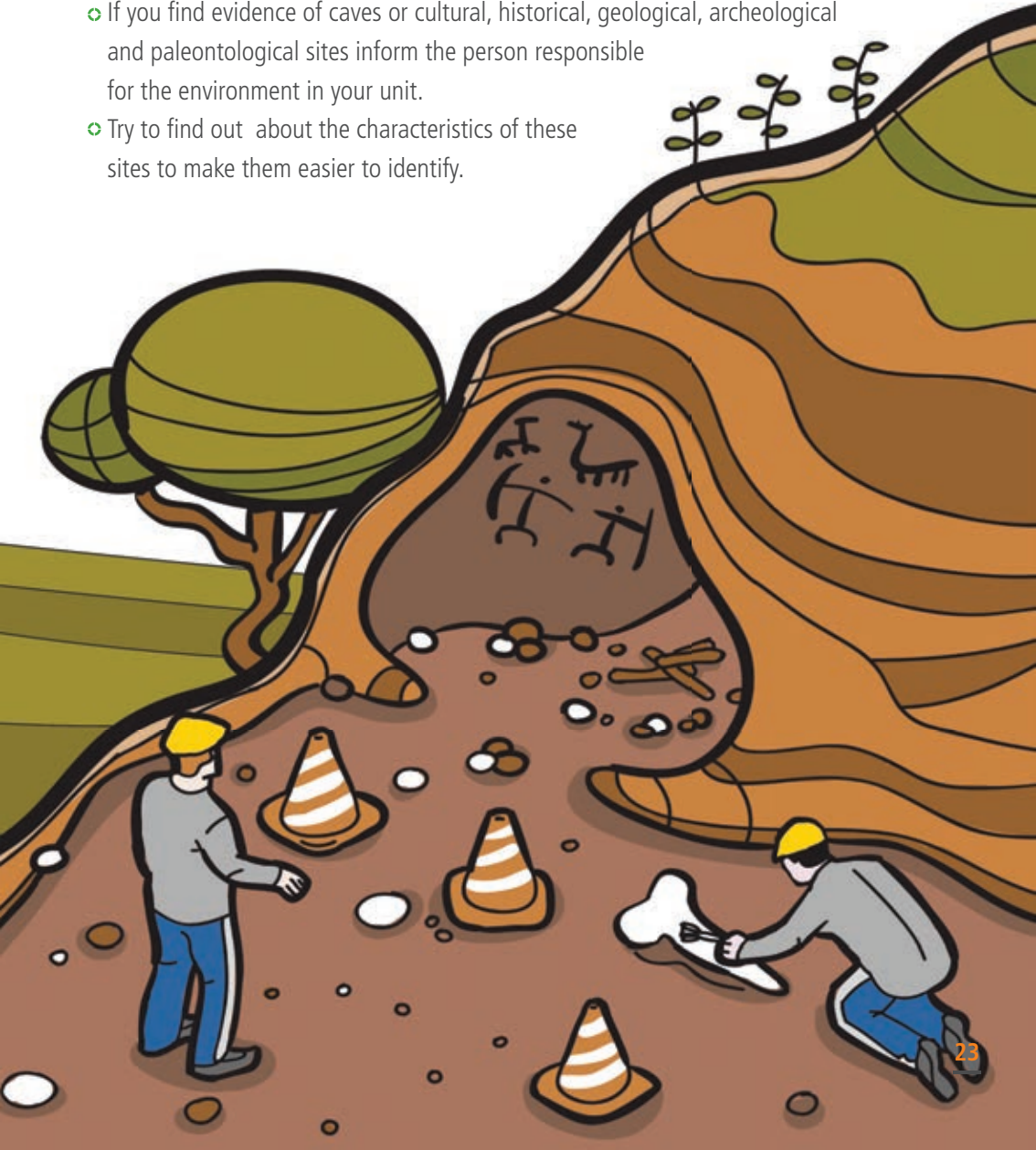
Caves and cultural, historical, geological, archeological and paleontological sites belong to humanity and must be preserved.





HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

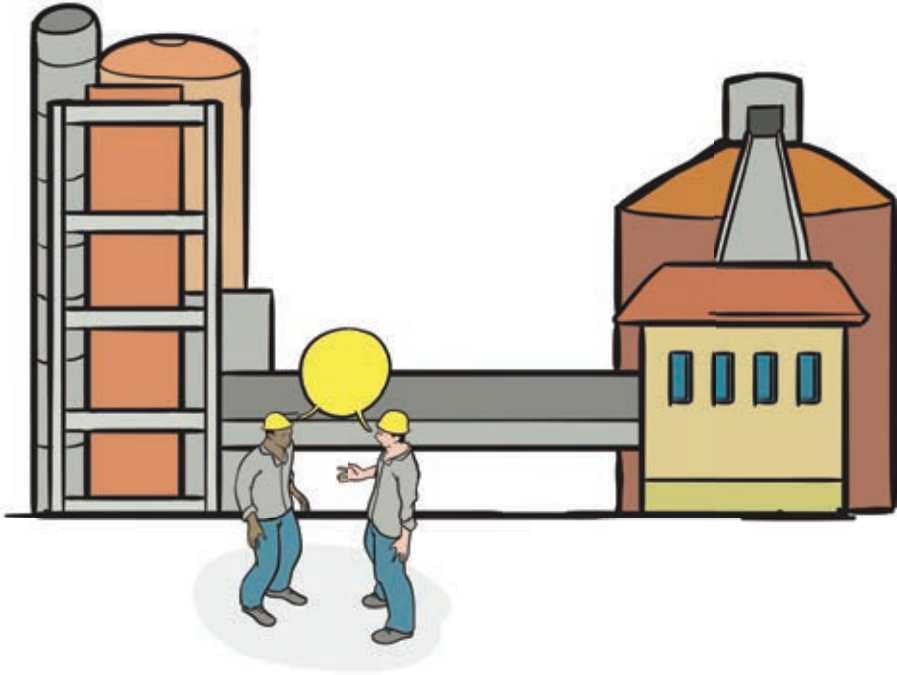
- ❖ If you find evidence of caves or cultural, historical, geological, archeological and paleontological sites inform the person responsible for the environment in your unit.
- ❖ Try to find out about the characteristics of these sites to make them easier to identify.



8 MAINTAIN A PROCESS OF OPEN DIALOGUE. RESPECT NEIGHBORS AND STAKEHOLDERS

Provide our stakeholders with regular information on our environmental performance and, when possible, ask their opinion, encouraging open discussion.





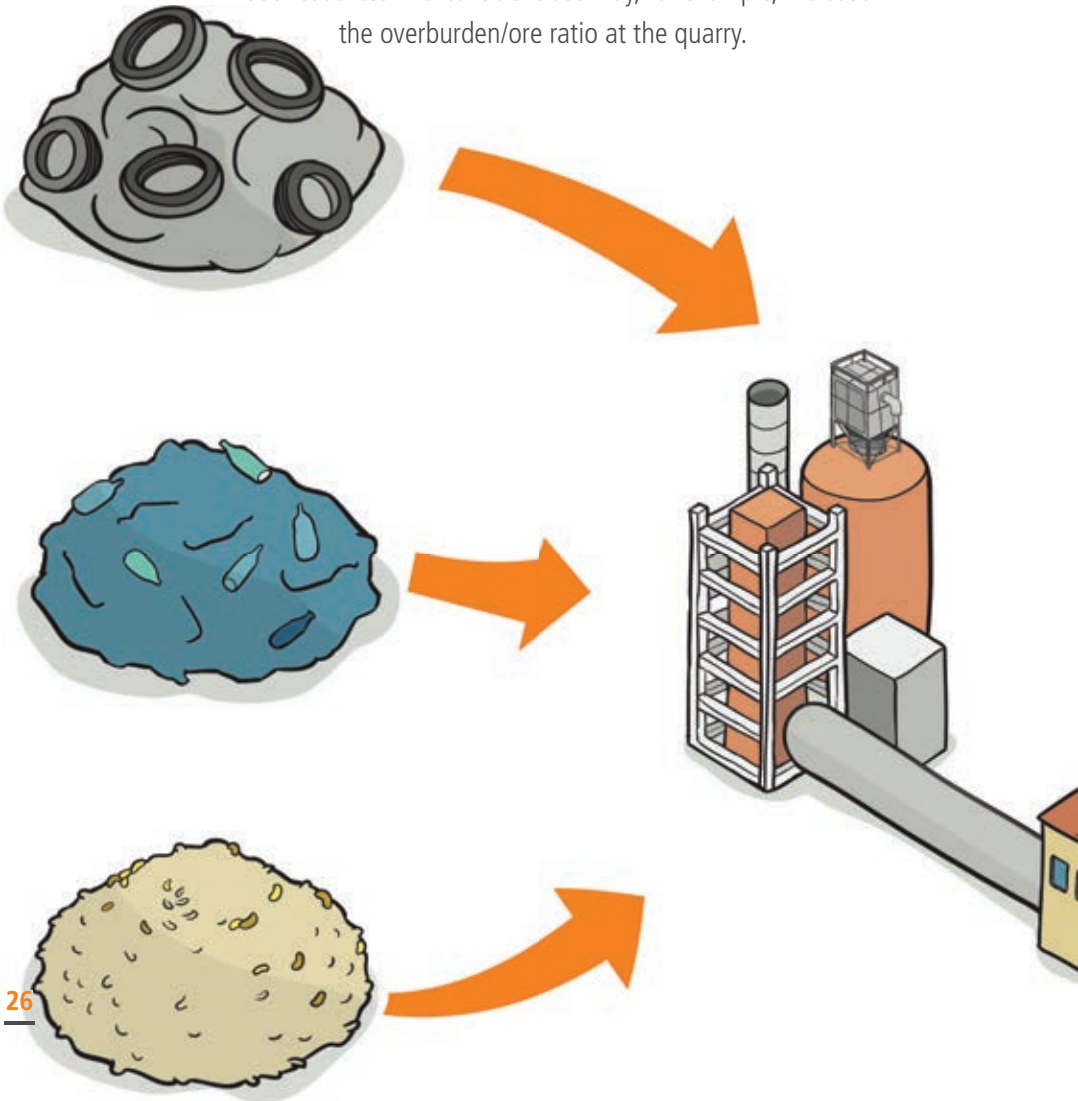
HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ❖ Promote open dialogue, be transparent and report situations of non-conformity in your unit.
- ❖ The unit should organize regular discussions with the community, NGOs and other stakeholders to provide feedback on your performance and actions regarding the environment, listening to them and answering their questions.
- ❖ A communication channel for stakeholders should be set up at each unit. Stakeholder groups should be informed so that they can contact the company whenever they think it necessary.
- ❖ When possible, conduct research or use other means to ask the opinion of stakeholders on the most relevant topics.

9 REDUCE THE USE OF VIRGIN RAW MATERIALS WHENEVER POSSIBLE. MAXIMIZE THE EFFICIENT AND RESPONSIBLE USE OF RESOURCES

Minimize the use of non-renewable resources and, where possible, replace them with alternative raw materials, fuels or biomass, in a secure manner after getting permission from the proper authority.

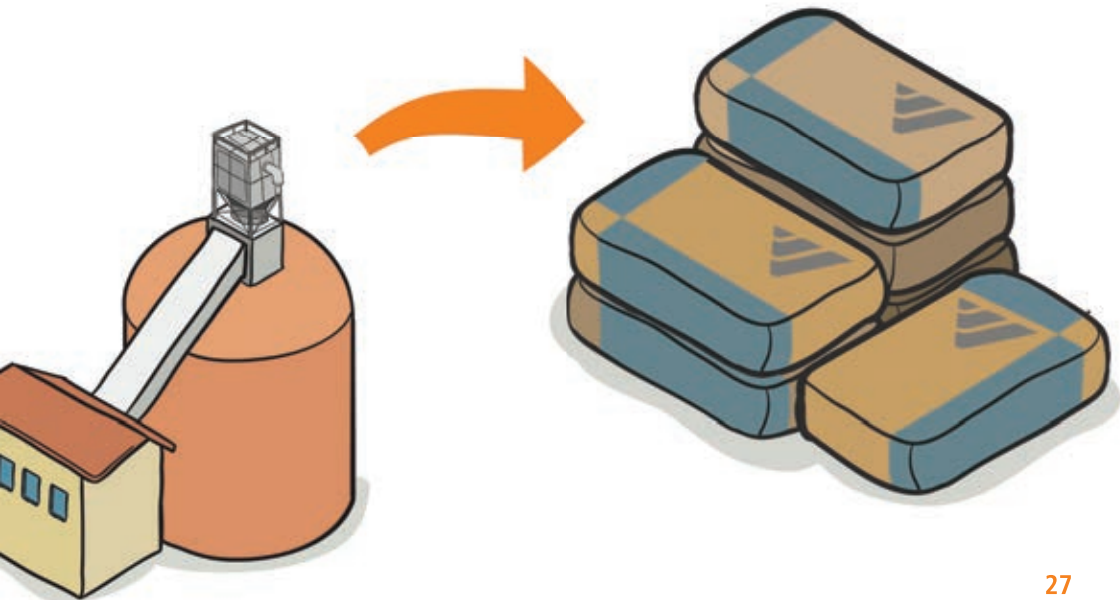
Use resources in a conscientious way, for example, increase the overburden/ore ratio at the quarry.





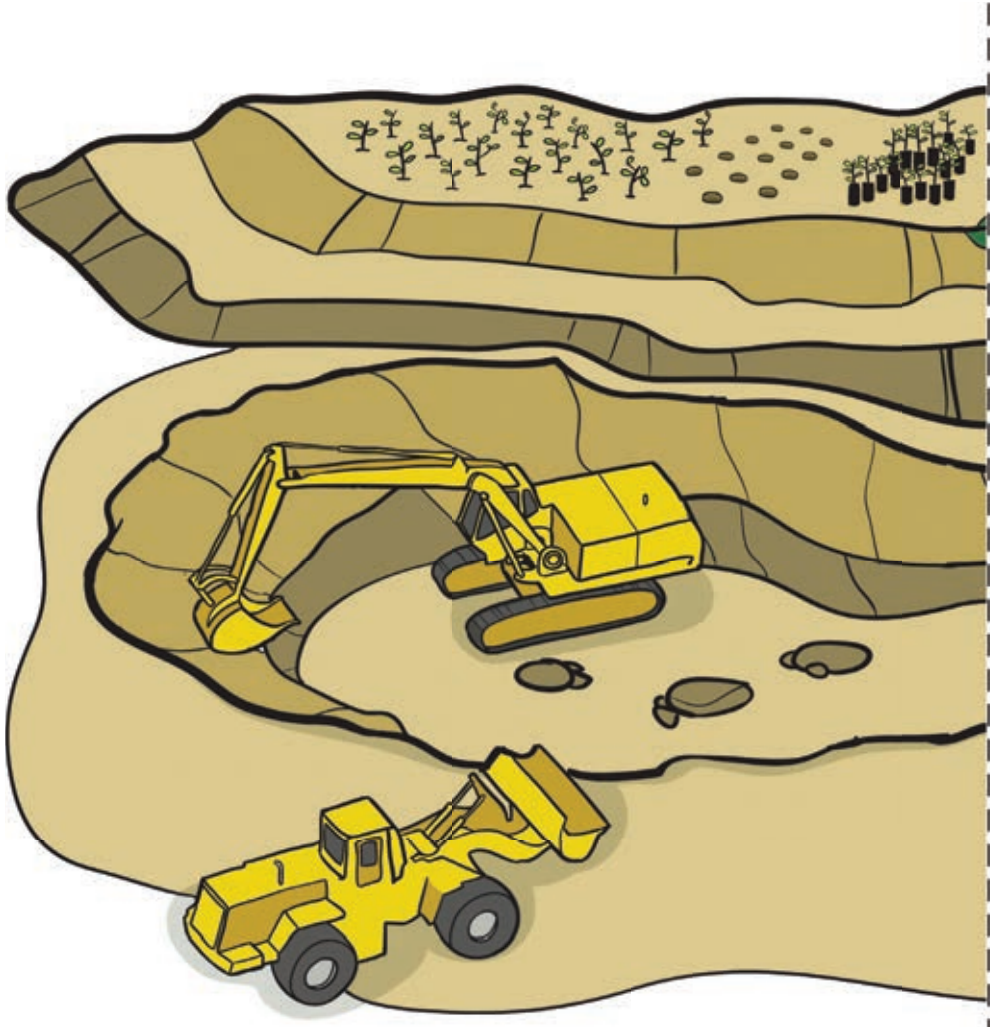
HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ◊ Identify alternatives for fuel and raw materials in your region and suggest the carrying out of feasibility tests.
- ◊ Research and develop new alternatives for cementitious materials.
- ◊ Promote the use of construction waste in your production processes.
- ◊ Seek to improve the overburden/ore ratio, optimizing the use of the materials extracted from the quarry.
- ◊ Encourage co-processing and the use of recycled aggregates and cementitious materials as ways of contributing to preserving natural resources.



10 REHABILITATE COMPANY SITES – DURING OPERATIONS AND POST-CLOSURE

Areas affected by the production operations and mining activities should be rehabilitated as soon as possible, according to the rehabilitation plan. The necessary rehabilitation actions following the unit's closure should be ensured.





HERE ARE SOME EXAMPLES OF HOW TO PUT THIS RULE INTO PRACTICE:

- ❖ Develop plans for the closure of your unit and the rehabilitation of the area.
- ❖ Inform yourself about the plans for the closure of your unit and the rehabilitation of the area and carry out the necessary actions when necessary.
- ❖ The areas mined, deposits of waste material and other areas that are to be rehabilitated should be restored according to the unit's rehabilitation plan.
- ❖ The actions needed for the rehabilitation of areas after closure must be carried out early enough to ensure that the rehabilitation is effective.



OUR SUSTAINABILITY COMMITMENTS FOR 2020

SAFETY

There can be no excellence, or competitive performance without considering health and safety, therefore, these are our top priorities. Votorantim Cimentos has established ambitious goals to promote zero harms environment for our employees and eliminate fatalities and, they are being diligently pursued. The foundations for our corporate actions are established in the Global Safety & Health Policy, and the Life Saving Rules.



COMMUNITY ENGAGEMENT

Votorantim Cimentos is part of the communities where it operates. Therefore, it is constantly working to improve its dialogue with stakeholders and promoting quality of life, which also results in a better and more transparent environment for business. The company, together with its stakeholders, works on projects and programs that have strengthening human, social and institutional capital and fostering economic dynamism.





ETHICS & COMPLIANCE

Votorantim Cimentos has a strong commitment to operate ethically and in accordance with laws, norms and regulations. The company's guidelines for ethical behavior are contained in the Votorantim Code of Conduct, which is inspired by its values and beliefs and expresses the principles that support positive relationships among stakeholders.

ECO-EFFICIENCY & INNOVATION

We believe that cement production must use clean technologies that constantly improve natural resource allocation, reduce emissions and waste. The company invests in R&D to develop new technologies and improve existing ones to promote eco-efficiency in its processes and products. Moreover, we are committed to protecting water sources and biodiversity, through the management of protected areas in the vicinity of our units.

