



I. Introduction, Purpose and Scope

CRH is committed to the highest level of legal, ethical and moral standards, as set out in our Code of Business Conduct. This Anti-Bribery Policy (the “Policy”) amplifies the principles set out in the Code of Business Conduct and is intended to ensure compliance with all relevant laws on anti-bribery and corruption, including the UK Bribery Act and the US Foreign Corrupt Practices Act (“FCPA”), among others. The

Policy should enable employees to recognise potential areas for concern, avoid prohibited conduct and promptly seek guidance when necessary, so that both CRH and its employees are protected from the legal and reputational consequences associated with bribery and corruption violations.

II. Statement of Policy

CRH does not tolerate any form of bribery or corruption. All employees and those acting on CRH's behalf are strictly prohibited from offering, paying, soliciting, facilitating, or accepting bribes. External and internal bribery risks are assessed on an ongoing basis and policies and procedures aimed at preventing bribery and corruption implemented, including those designed to ensure:

- Financial and commercial controls are in place to minimize the risk of corrupt payments, including maintaining complete and accurate books and records.
- Training is provided to all relevant employees and other key stakeholders as appropriate in relation to their activities and associated risks.
- Risk of successor liability is mitigated by due diligence in advance of acquisition/joint venture transactions and that acquired business units are appropriately integrated to comply with our policies and procedures. Successor liability refers to circumstances in which the purchaser of a business is held responsible for the seller's liabilities.
- Our business partners operate in compliance with applicable local and international anti-bribery and corruption laws. Business partners are those who are empowered to act on behalf of CRH, for instance, in assisting CRH to secure, prepare or negotiate bids for new contracts, or the extension of existing contracts. Business partners include, but are not limited to, exclusive sales agents and distributors, lobbyists, and joint venture partners (short or long-term).
- This Policy is communicated to all relevant employees and business partners.
- All employees must report suspected or actual instances of bribery or corruption, either to their manager or, if they feel more comfortable, via the CRH Hotline (www.crhhotline.com), with the option to remain anonymous and without fear of retaliation. CRH will not tolerate any form of retaliation against any employee who, acting in good faith, reports a concern or cooperates with an investigation.

CRH has specific anti-bribery and corruption requirements including in the following risk areas (see the CRH Anti-Bribery Guidelines for further details):

Gifts, Hospitality and Promotional Expenditure

CRH prohibits the offering or receipt of gifts or hospitality whenever such arrangements could influence, or be seen to influence, the outcome of a business decision.

Political Contributions

CRH and its employees must comply with local laws regarding political contributions, which include contributions to or through political parties, organisations or individuals engaged in politics. However, CRH imposes a higher standard on itself and its employees than what is strictly required by law in certain jurisdictions. Even in those situations where political contributions are permitted by local law, they should not be made as a way of obtaining advantage in business transactions.

Charitable and Community Donations

Donations must only be made for bona fide charitable or public relations reasons. Donations should not be made when there is or may be a potential conflict of interest. Refer to “Charitable Donations and Community Engagement Policy” for further details.

Business Partners

Due Diligence must be undertaken to ensure our business partners share our commitment to ethical business standards. Written arrangements containing anti-bribery provisions must be put in place, and compensation must be commensurate with the legitimate services provided, approved, properly recorded and paid in accordance with the contract. Due diligence is important when using third parties as CRH may, in certain circumstances, still be liable for corruption carried out by a third party.

Facilitation Payments

These are typically small payments made to public officials to expedite or secure routine actions (such as issuing permits or customs clearance). CRH prohibits facilitation payments, whether or not they are permitted by law in a particular jurisdiction.

Suppliers

The CRH Supplier Code of Conduct sets out CRH's ethical standards for its suppliers, including compliance with anti-bribery and corruption laws.

Anti-Bribery Policy continued

III. Roles and Responsibilities

Employees must:

- Read and understand their obligations under this Policy;
- Participate in any relevant training programme provided.

If unsure, seek advice in relation to any aspect of this Policy from their manager, their local legal or compliance contact, or, if they prefer, from any of the Legal and Compliance Group (members of the Legal and Compliance teams at Group or regional level) contacts listed below).

Report suspected or actual instances of bribery or corruption, either to their manager or, if they feel more comfortable, via the CRH Hotline (www.crhhotline.com), a multi-lingual and independent service through which the employee can communicate concerns in his or her own language with the option to remain anonymous and without fear of retaliation.

No employee will suffer adverse consequences for refusing to pay bribes or refusing to participate in other corrupt practices, even if this means a loss of business.

Company management must:

- Set an appropriate tone from the top and embed an anti-bribery culture across their business;

- Support communication of this Policy to employees and ensure employee participation in related training programmes;
- Follow this Policy in all interactions with customers, suppliers and business partners;
- Implement and ensure the operational effectiveness of adequate controls and procedures to prevent and detect instances of bribery, including the maintenance of accurate, appropriately detailed books and records to properly record and report the substance of all transaction and disposition of assets;
- Ensure that appropriate and regular training is provided to relevant employees;
- Participate in any anti-bribery risk assessments;
- Ensure CRH Hotline information is displayed prominently via posters and other means, and is available to all employees;
- Ensure immediate reporting of any breach or suspected breach to Legal and Compliance.

IV. Monitoring, Assurance and Breach Reporting

Monitoring

Compliance with this Policy will be monitored as part of routine Legal and Compliance activities. Matters identified will be reported to the relevant stakeholders, including the Audit Committee.

Assurance

Compliance with the Policy may form the subject of audits and other internal and external testing. Internal Audit may report areas of concern about compliance with this Policy to Legal and Compliance. CRH may also review employees' activities, including company e-mails, to ensure compliance with this Policy.

Reporting

Any employee who violates the law or fails to determine in advance whether his or her conduct is appropriate, is acting individually and without CRH authority. Violations could subject CRH to significant civil and criminal penalties, debarment, damages, actions by third parties and harm its reputation and brands. Individuals can be subject to civil and criminal penalties, disqualification and imprisonment. CRH takes violation of anti-bribery laws seriously.

Failure to comply with this Policy, either intentionally or through negligence, may result in disciplinary procedures being fully enforced, including termination of employment and/or relevant contracts.

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 |
|---------------------------------|-----------------|--|------------------|
| General Counsel - Corporate | Aisling McKeown | amckeown@crh.com | +353 87 406 4005 |
| General Counsel - Europe | Niamh Flood | nflood@crh.com | +353 87 622 0451 |
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VI. Supplementary Documentation

- Anti-Bribery Guidelines