



Independent Limited Assurance Statement

to the Management of Heidelberg Materials AG

Heidelberg Materials AG (“Heidelberg Materials”) commissioned DNV Business Assurance Germany GmbH (“DNV”, “we”, or “us”) to perform an independent assurance engagement on the allocation of Environmental Attribute Certificates (“EACs”). This engagement covers the transfer of EACs from Heidelberg Materials’ central administrative account to selected product categories sold to customers from Heidelberg Materials’ production sites during the balancing period.

The objective of the assurance engagement is to evaluate whether the allocation of EACs has been carried out in accordance with Heidelberg Materials’ “Methodology Documentation for CCS Cement Carbon Reductions Policy v1.2”, and to confirm that such allocations are consistent with the defined methodology requirements.



Our Conclusion: Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the allocations of EACs from Heidelberg Materials’ central administrative account have not been performed in adherence with the Methodology.

This conclusion relates only to the Scope of the Assessment and is to be read in the context of this Assurance Statement, in particular the inherent limitations explained overleaf.

Scope of engagement

We assessed Heidelberg Materials’ allocations of EACs from their central administrative account for the balancing period of **1 November 2025 through 31 March 2026** against the Methodology¹, by performing specific procedures which include but are not limited to the following:

- Reviewing environmental product declarations (EPDs) for Heidelberg Materials’ conventional cement products to confirm validity and eligibility for allocation of EACs based on production location;
- Reviewing on a selective basis of evo-brand product variant² sales transactions occurring in each month of the balancing period as they were recorded across Heidelberg Materials’ ERP system and in invoices addressed to Heidelberg Materials’ customers at the point of product delivery to confirm delivered product quantities;
- Performing limited substantive testing of the calculations for the number of EACs to be allocated to and bundled with orders of evo-brand product variants³, based on the GWP (global warming potential) per ton of delivered product;
- Confirming that the number of allocated EACs has not exceeded 90%⁴ of the equivalent fossil CO₂ which has been verified to be permanently stored, as of the end of each intervening month of the balancing period;
- Reviewing that the quantity of EACs and equivalent fossil CO₂ reductions which have been allocated to customer orders, are demonstrated to have been functionally withdrawn from Heidelberg Materials’ central administrative account, observed within Carbon Bank (Heidelberg Materials’ MRV platform), and confirming that these allocated quantities are not double-counted;
- Reviewing on a selective basis that withdrawals from the central administrative account and subsequent allocations are substantiated by blockchain transactions on the Hedera platform;
- Conducting interviews with Heidelberg Materials’ technical teams and other key personnel to obtain an understanding of the key processes, systems and controls that generate, aggregate and report the selected information;
- Remote review of specific data and systems; DNV was free to request interviews, data and information to support the process.

Standard and level of assurance

DNV applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17029:2019 – Conformity Assessment – General principles and requirements for validation and verification bodies and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement; and the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. We planned and performed our work to obtain the evidence we considered sufficient to provide a basis for our opinion, so that the risk of this conclusion being in error is reduced but not reduced to very low.

¹ Available on Heidelberg Materials’ website: <https://www.evozero.com/en/assurance>

² evoBuild Carbon Captured and evoZero Brevik (both products from Heidelberg Materials’ plant in Brevik, Norway), and evoZero Carbon Captured (based on conventional products from other eligible production sites)

³ evoBuild Carbon Captured carries a GWP-total (net) of 230 kg CO₂eq/t cement; evoZero Carbon Captured Brevik carries a GWP-total (net) of 46 kg CO₂eq/t cement; evoZero Carbon Captured carries a GWP of zero (0).

⁴ Under the programme rules, Heidelberg Materials may issue EACs in a number not to exceed 90% of the equivalent fossil CO₂ which has been permanently stored. To ensure an excess of EACs is not issued, the remaining 10% of stored fossil CO₂ with accompanying EACs shall be reserved in the event of any adjustments to reconcile the central record at year-end. The remaining 10% may be released for allocation to products if not needed to reconcile the central record.



Limitations and exclusions

- The assessment by DNV is limited to the information specified in the scope of the engagement. The assessment provided by DNV is based on the information made available to us at the time of the engagement. DNV assumes no responsibility for any changes or updates made to the information after the completion of the assessment engagement.
- This Statement is for the sole use and benefit of the party contracting with DNV to produce this Statement. Any use of or reliance on this document by any party other than the Company shall be at the sole risk of such party. In no event will DNV or any of its parent or affiliate companies, or their respective directors, officers, shareholders, employees or subcontractors, be liable to any other party regarding any statements, findings, conclusions or other content in this Statement, or for any use of, reliance on, accuracy, or adequacy of this Statement.

Our competence, independence and quality control

DNV established policies and procedures are designed to ensure that DNV, its personnel and, where applicable, others are subject to independence requirements (including personnel of other entities of DNV) and maintain independence where required by relevant ethical requirements. This engagement work was carried out by an independent team of sustainability assurance professionals. DNV is contracted with Heidelberg Materials to perform verification of EACs eligible for deposit to the central administrative account, the scope of which, in our opinion, does not conflict with the scope of this work. Our multi-disciplinary team consisted of professionals with a combination of environmental and sustainability assurance experience.

For and on behalf of DNV Business Assurance Germany GmbH

Oliver Bley
Lead Verifier

Anjana Sharma
Reviewer

22 May 2026
Essen, Germany



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Inherent limitations

DNV's assurance engagements assume that the data and information provided by Heidelberg Materials to us as part of our review have been provided in good faith, are true, and are free from material misstatements. Because of the selected nature (sampling) and other inherent limitation of both procedures and systems of internal control, there remains the unavoidable risk that errors or irregularities, possibly significant, may not have been detected. The assessment is limited to data and information in scope within the defined reporting period. Any data outside this period is not considered within the scope of assessment. DNV expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Assurance Statement.