



# CODE OF ETHICS AND CONDUCT OF THE INMO CEMENTO GROUP

Version approved by the **Board of Directors of INMO CEMENTO** on 7 November 2024.

**INMOCEMENTO's vision defines the future we are pursuing and gives purpose to our action. In this way, we all share the same culture and are committed to the same project: one INMOCEMENTO.**

## Vision

To be recognised by the society it serves by establishing relationships of trust and mutual benefit with its stakeholders, driving the creation of value through the Group's companies and promoting innovation, operational efficiency and the development of high-impact projects that contribute to the economic and social well-being of the communities in which we operate.

## Mission

To be a benchmark Group in the global cement and real estate sector, creating value for all our stakeholders and seeking above all the satisfaction of our customers.

## Values Integrity

We make decisions honestly, transparently, respectfully and consistently. We strive to behave in a manner that is above reproach towards our stakeholders.

## Customer service

Quality is the basis of our growth. That is why we work in an exemplary and service-oriented manner in our dealings with customers, placing their interests at the same level as our own.

## Vocation of leadership

All of us in the Group strive for excellence in all areas of activity.

## Innovation

We constantly seek solutions that add value to the Group and to the society we serve.

## Well-being and development of communities

We are aware of the value that our services bring to society and we are committed to the protection of the natural environment, development and well-being of the communities in which we operate.

Our Code of Ethics and Conduct develops in a practical way the shared values of the INMOCEMENTO Group, strengthens a culture of compliance and supports the long-term value creation of our project.

The application of the contents of the Code may not, under any circumstances, give rise to a breach of the applicable legal provisions. If such a circumstance is found to exist, the contents of the Code must comply with the provisions of the aforementioned legal provisions.

The Code shall prevail over any internal rules and local Codes of Conduct that may contradict it, unless these establish more demanding conduct requirements, with specific adaptations to the countries in which the INMOCEMENTO Group operates being permitted, after consultation with and authorisation by the Compliance Committee.

### The Code of Ethics and Conduct of the INMOCEMENTO Group.

The purpose of the Code of Ethics and Conduct is to promote that all persons linked to any company of the INMOCEMENTO Group (also referred to as the "**Group**") are guided by guidelines of behaviour with the highest level of demand in the commitment to comply with laws, regulations, contracts, procedures and ethical principles.

Compliance with this Code is mandatory for all persons linked to any INMOCEMENTO Group company, regardless of the type of contract that determines their employment relationship, the position they occupy or the geographical area in which they work.

The guidelines for conduct contained in this Code of Ethics and Conduct also affect all investee companies and entities in which INMOCEMENTO has a stake, S.A. ("**INMOCEMENTO**" or the "**Company**") has management control. In addition, the INMOCEMENTO Group will promote the adoption of principles and values similar to those of this Code in those companies in which it participates, even if it does not have control, as well as among its suppliers, contractors, collaborators and other partners.

## Ethics and compliance model

The INMOCEMENTO Group's ethics and compliance model (the "**Compliance Model**" or the "**Model**") aims to prevent and detect risks of non-compliance, including those related to criminal offences, as well as to minimise their possible impacts. This Code is the highest level standard of this Model and is developed through policies, procedures and internal controls that are periodically reviewed and updated.

To adapt this Model to the Group's activities, risks are periodically analysed, defining responsibilities and expected behaviours, allocating resources for employee training, and having processes in place to assess compliance and the ethical culture of the organisation, as well as to detect, notify and respond to potential irregularities. The Board of Directors of INMOCEMENTO is responsible for approving both the Code of Ethics and Conduct and the Compliance Model and, ultimately, for ensuring the ethical climate of the organisation, assisted by the Audit and Control Committee. Supervision of compliance with this Code and, in general, the application of the Compliance Model shall be the responsibility of the Compliance Function, which shall report to the Audit and Control Committee, and shall be supported by the Compliance Committee and Internal Audit, all without prejudice to the responsibilities corresponding to the management bodies of the other Group companies and the bodies responsible for the compliance function in those companies, in accordance with the provisions of the INMOCEMENTO Group's Compliance Policy.

The INMOCEMENTO Group applies the principle of due control in order to promote compliance with applicable internal and external regulations and to prevent, detect and eliminate irregular, inappropriate or contrary conduct.

Each of the head companies of the business areas responsible for the management of INMOCEMENTO's main businesses shall have a Compliance Committee for the business as the body responsible for the Compliance Function of that company, which shall be supported by its own Compliance Officer.

# Principles of ethics and compliance

- You must know and apply the law in your work.
- You should apply the guidelines of the Code in your individual conduct, promote its application throughout the organisation, contribute to creating a culture of compliance, avoid and correct behaviour that contravenes.
- You should report to the Ethics Channel any conduct that you believe to be contrary to the Code of which you are aware.

## Principles of ethics and compliance

### **We respect the law and comply with the rules.**

We assume the commitment to carry out our business and professional activities in accordance with the current legislation in each of the places where they are carried out.

### **We are exemplary in conduct**

Our actions protect the reputation of the INMOCEMENTO Group and are an example of ethics, rigour, professionalism and honesty.

### **We are diligent and accountable for our actions**

We apply a consistent ethics and compliance model based on due diligence for the prevention, detection and eradication of misconduct.

At the INMOCEMENTO Group we understand that the application of due diligence in ethics and compliance matters includes an appropriate assessment of the ethics and compliance models of third parties with whom we have relationships.

### **We report irregularities**

We inform the organisation of any incidents or irregularities of which we are aware through the channels provided.



### **Honesty and Respect**

1. We respect legality and ethical values.
2. Zero tolerance for bribery and corruption.
3. We act against money laundering and the financing of terrorist activities.
4. We protect free competition and good market practices.
5. We behave ethically in the securities market.
6. We avoid conflicts of interest.

### **Rigour and Professionalism**

7. Rigour in control, reliability and transparency.
8. We protect the Group's reputation and image.
9. We use the company's means and assets efficiently and safely.
10. We safeguard the ownership and confidentiality of data and information.

### **Loyalty and Commitment**

11. Our customers are at the centre.
12. The health and safety of people are paramount.
13. We promote diversity and fair treatment.
14. We are committed to our environment.
15. We engage transparently with the community.
16. We extend the commitment to our business partners.

## Honesty and Respect

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### **Regulatory compliance is always our starting point.**

The INMOCEMENTO Group is committed to conducting our business and professional activities in accordance with the laws in force in each of the places where we operate, including regulations relating to international sanctions or restrictive measures, export or import controls and dual-use items, as well as company rules and procedures.

### **Respect for human dignity and fundamental rights is a basic element of the INMOCEMENTO Group's conduct.**

All employees of the INMOCEMENTO Group must support this commitment, carrying out our professional activities with full respect and guarantee of human rights and civil liberties.

### **Honesty and respect for the law and the company's rules must be a constant in the daily behaviour of all Group employees and, in particular, of its executives.**

Behaviour in accordance with the company's values is a criterion in the selection and evaluation of the Group's employees and in the application of disciplinary measures where appropriate.

INMOCEMENTO Group policies are available on the corporate website.

**You should pay particular attention to:**

The INMOCEMENTO Group promotes a relationship of reciprocal cooperation with the authorities in the countries where it operates. All INMOCEMENTO Group activities must properly comply with its obligations, including tax and social protection systems, ensuring that public aid, subsidies and other funds of which the Group is a beneficiary are used exclusively and diligently for the purpose for which they were granted.

In addition to compliance with current legislation, the policies and standards of the INMOCEMENTO Group are mandatory and incorporate the requirements of the voluntary principles to which the Group is committed, such as the United Nations Global Compact and the provisions of the Declaration on Fundamental Principles and Rights at Work and the Conventions of the International Labour Organisation.

**You should pay particular attention to:**

### **International Sanctions and Embargos**

In general, international sanctions and embargoes are coercive measures applied against states, non-state entities or individuals that pose a threat to international peace and security. The most common measures are trade or financial bans, as well as visa or travel bans imposed by a multilateral body or by a state.

The sanctioned countries can be found in the following information links:

<https://sanctionssearch.ofac.treas.gov/>

<https://www.sanctionsmap.eu/#/main>

**Dual-Use Goods** are those goods, including software and technology, which can be put to both civil and military or nuclear uses.

You should be particularly vigilant and in any case follow the policies and procedures on due diligence in relations with third parties, including in relation to partners and agents, and in case of doubt consult with the Compliance Officer:

- Commercial, financial, import and export transactions with sanctioned countries, persons or entities.
- Any operations relating to Dual-Use Goods.

## ZERO TOLERANCE FOR BRIBERY AND CORRUPTION

### **Zero tolerance**

The INMOCEMENTO Group does not tolerate corruption, bribery, bribery and any form of extortion. It is forbidden to influence the will of third parties with the aim of obtaining an advantage, favourable treatment or a guarantee of obtaining benefits for the Company, for yourself or for others, by means of any kind of payment or consideration in cash or in kind, directly or through third parties.

Relationships with customers, suppliers, partners, collaborators or persons or entities that have, have had or may have business with the INMOCEMENTO Group must be carried out by persons authorised to do so and must be kept within the limits established in this Code.

### **Delivery and acceptance of gifts and invitations**

The giving of any gift beyond customary business practices or courtesy is not permitted and may in no case be intended for / or involve favourable treatment in any activity that may be linked to the Group.

It is not permitted to solicit or accept gifts, payments, commissions or any other personal benefits from, or by anyone acting on behalf of, current or potential customers, suppliers or persons who maintain, or aspire to maintain, relationships with the Group. This includes the provision of personal services, job offers, travel, preferential treatment, special discounts or anything else of value.

## **Please note in particular: Gifts and**

### **invitations**

The guidelines set out in this Code are intended to be flexible to accommodate customs and practices in the different parts of the world where the Group conducts business, and sufficiently objective to provide useful guidance. Under this approach, gifts of a promotional nature, courtesies and customary hospitality may be accepted or made, provided that all of the following circumstances apply:

- Are not prohibited by law.
- They cannot be considered inappropriate or unprofessional.
- To be given or received, in a transparent manner and on an occasional basis, in accordance with generally accepted commercial practice or social courtesy.
- Have a reasonable value. In general, gifts that do not exceed EUR 150 or its equivalent in the relevant currency are deemed to have a reasonable value. In calculating the amount, all gifts and hospitality received or given to or by a third party within a six-month period shall be taken into account.
- Do not consist of sums of money or of securities and assets which are readily settleable in cash.
- They should not be accepted or submitted if, because of the timing or for other reasons, they could be perceived as being made with the intention of influencing professional decisions.
- Not having been requested.

### **Invitations to lunches and sporting, cultural or educational events**

In general, invitations to lunches and events are appropriate if they are reasonable. In general, those not exceeding 75 euros per person are considered reasonable, taking into account the location, the context, the nature of the event, and always in accordance with the performance principles.

Attendance at seminars and purely training activities are not considered as personal benefits, unless the cost, location, context or ancillary services are not appropriate for their purpose.

## WE ACT AGAINST MONEY LAUNDERING AND THE FINANCING OF TERRORIST ACTIVITIES<sup>3</sup>.

### We remain vigilant to prevent illegal activities

At the INMOCEMENTO Group, we are particularly diligent in complying with regulations relating to money laundering and/or the financing of terrorism.

The INMOCEMENTO Group does not permit, as a general rule, cash payments and collections. Any exceptions must be properly documented and authorised, be for small amounts, in any case less than 1,000 euros in payments to third parties, and comply with local legislation in force on the matter.

In those jurisdictions and activities in which the INMOCEMENTO Group is subject to mandatory monitoring and reporting, the diligence measures carried out must be in accordance with the legal provisions in this area.

### You should be particularly vigilant

- The effective identity of the third party with whom we are going to work: client, partner, supplier, NGO, etc.
- The source of funds we receive as payment.
- Collections that are split or structured to circumvent any of the registration or systematic reporting under applicable anti-money laundering and terrorist financing legislation.
- Payments which directly or indirectly could be used, in whole or in part, for the commission of activities of a terrorist nature.
- Payments that may have no commercial purpose or reasonable explanation.
- Payments and receipts from or to bank accounts of persons or entities resident in tax havens.



## WE PROTECT FREE COMPETITION AND GOOD MARKET PRACTICE

### **Our aim to be a market leader is a responsibility and not just an advantage.**

We observe the rules and principles of free competition in all markets in which we operate. We behave fairly and avoid any conduct that constitutes or may constitute collusion, abuse or restraint of competition.

The INMOCEMENTO Group prohibits conduct that could impede the development and maintenance of effective competition. We avoid any conduct that could involve abuse or price manipulation.

### **In any case, you should avoid**

- Abuse of market power or dominance.
- Discussions and agreements with competitors aimed at coordinating their behaviour in the market.
- Bid rigging, including also the determination of the parties to bid or their exclusion, the terms of their bids, the fixing of prices and any exchange of information with respect to the above terms made on terms that exclude third parties.
- In addition, the use of misleading advertising and the unfounded discrediting of competitors' products and the companies that produce them is expressly prohibited.

### **Access to market impact information comes with limitations and responsibilities that must be known and respected.**

The INMOCEMENTO Group has internal regulations in accordance with the obligations established by securities market legislation. Employees or other persons related to the Group who are subject to such internal regulations must observe the limitations on the use of privileged information to which they have access in the course of their professional activity.

In this sense, any information of a specific nature which has not been made public and which, if it had been made public, could have or would have had an appreciable influence on the price of negotiable securities or financial instruments within the scope of application of the Securities Market Law or their issuers, shall be considered privileged information.

### **You should be particularly vigilant**

- In your relations with third parties, take care with any information that may alter the share price of any of the companies in the INMOCEMENTO Group or other companies.
- Keep sensitive information protected, do not communicate to third parties material information that is not in the public domain for your personal benefit, or for the benefit of related persons or third parties or with the intention of disrupting markets.
- Do not trade in assets and securities about which you are in possession of inside information.

## WE AVOID CONFLICTS OF INTEREST

### Duty of loyalty

In the performance of our professional responsibilities, we must act with loyalty and with a view to defending the interests of the Group, avoiding situations that may give rise to a conflict between our personal interests and those of the Group. Employees of the Group are not permitted, in the exercise of their position or responsibility, to act in their own or related persons' present or future benefit, to the detriment of the Group's interests.

The directors and administrators must also be familiar with and apply commercial legislation and the Regulations of the Board of Directors of INMOCEMENTO regarding conflicts of interest and the application of the duty of loyalty in relation to related-party transactions.

### Cases in which you should consult through the Ethics Channel as they may give rise to conflicts of interest

- Being involved, directly or through a related person, in any transaction or economic operation with integrated companies of the Group.
- Have the capacity to decide, negotiate or enter into contracts on behalf of any of the Group companies with related persons or with legal persons in which the employee, directly or through a related person, has a financial or personal interest.
- Being directly or through a related person, significant shareholder, director, advisor, manager, etc., of customers, suppliers or direct or indirect competitors of any of the companies in the Group.
- Having to supervise the work or performance of related persons.

- That the decision-maker in a tendering process was a related person.
- In the course of an audit, review by a regulator or supervisor, the person responsible or components of their teams were a connected person.
- Access to positions that are hierarchically or functionally dependent on a family member is subject to authorisation by the Human Resources Department.

### They are persons linked to

- The employee's spouse or similar.
- Ascendants, descendants and siblings of the employee or of the employee's spouse (or person in a similar relationship).
- The spouses of the employee's ascendants, descendants and siblings.
- Friendly relationships that may affect personal objectivity and the duty to act in the best interests of the Group.

### **Rigour and Professionalism**

1. Rigour in control, reliability and transparency
2. Protecting the Group's reputation and image
3. We use the company's means and assets efficiently and safely.
4. We safeguard the ownership and confidentiality of data and information.

**The information of the INMOCEMENTO Group must be prepared with the utmost reliability, in compliance with the applicable regulations and the Group's standards, and must be diligently guarded and preserved.**

We are responsible for carrying out our work in accordance with the Group's rules and procedures so that we are accountable for our actions at all times.

Transparency is a basic principle for the INMOCEMENTO Group. In this regard, all employees must cooperate with internal and external control areas, supervisors, regulators and administrative and judicial authorities, responding to their requests and requirements and providing promptly and accurately the information they require in areas within our competence.

### **You should be particularly vigilant**

The process of proper and complete accounting, recording and documentation of all transactions, income and expenses as they occur, without omitting, concealing or altering any data or information, so that the accounting and operational records accurately reflect reality and can be verified by the control areas and by internal and external auditors.

Failure to comply with these requirements may be considered fraud.

Circumvention of the Group's internal controls will be sanctioned.

### **We are all responsible for the image and reputation of the INMOCEMENTO Group.**

The relations of the INMOCEMENTO Group and its employees with the media are reserved to the Communications Department.

Any call, request for information, questionnaire or similar from the media shall be forwarded by the employee receiving it to that Area.

When, as an employee, you need to contact the media, you must inform the Communications Department.

### **You should be particularly vigilant**

- Information on the results and evolution of the INMOCEMENTO Group's business will always be managed through the areas and bodies responsible for investor relations.
- Any information published in the internal channels of the INMOCEMENTO Group may not be published in external media without the authorisation of the Communication Area.
- Only the Communication Area is authorised to open digital channels (social networks, websites, blogs, etc.) on behalf of the INMOCEMENTO Group.
- Only those employees who are expressly authorised may publish information or opinions on social media on behalf of the INMOCEMENTO Group. These authorised employees must also apply the internal rules of behaviour and act with respect, using good judgement and common sense and taking care of the information shared (\*).
- In your personal use of social networks, you must not use your status as an employee or any other reference that could attribute the content published to the INMOCEMENTO Group.
- Use the corporate identity (the logo, the brand) and the name of the INMOCEMENTO Group only for the proper development of your professional activity, according to the internal rules of use of the brand (\*).

(\* In the absence of a specific rule, please consult the Communication Area.

## WE USE THE COMPANY'S MEANS AND ASSETS EFFICIENTLY AND SECURELY

### **Company assets must be protected and used responsibly and efficiently.**

The INMOCEMENTO Group provides its employees with the means and resources necessary for the performance of their professional activity. Their use must be in accordance with internal regulations and efficient, providing the appropriate means to prevent their loss, theft, damage or malfunction.

The INMOCEMENTO Group has a Policy on the Use of Technological Media. All employees must consult it to ensure that we make appropriate, lawful and responsible use of these media, including computer tools and e-mail.

We are all accountable and responsible for exercising due diligence, working with management and audit to monitor and control their use where they deem it necessary.

### **You should be particularly vigilant**

- Keeping the company's assets and reputation safe.
- Compliance with physical and information security standards, immediately reporting any observed breach of security, suspected attack, tampering or illicit use.
- That all information that is created, received, sent, downloaded, stored or processed by any means may be accessed, reviewed, copied, recorded or deleted by the INMOCEMENTO Group in accordance with approved internal procedures.

## WE MONITOR THE OWNERSHIP AND CONFIDENTIALITY OF DATA AND INFORMATION

### **The duty to protect information and data from unauthorised access is an obligation for everyone.**

As employees of the INMOCEMENTO Group, we manage often confidential information of an economic, financial, technical, personal, commercial and administrative nature (in paper or digital format), which is of great value to the Group and is subject to intellectual property and personal data processing laws in the jurisdictions in which we operate.

All persons working in the INMOCEMENTO Group are obliged to comply with the company's rules on Information Security and Data Protection in force, as well as to respect the measures implemented by the Group to prevent external parties and employees from gaining access to information and/or data for which they are not authorised.

Remember that the obligation of confidentiality and reserve persists once your relationship with the INMOCEMENTO Group has ended.

### **You should be particularly vigilant**

- You must only use company-owned information for work-related purposes.
- The software must always be used in accordance with its licensing terms and without infringing the rights of third parties.
- All access passwords are the property of the company.



## **Loyalty and commitment**

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## OUR CUSTOMERS ARE AT THE CENTRE

**Our clients are at the heart of our business, which is why we strive to establish long-lasting relationships based on mutual trust, honesty, professional responsibility and the provision of value.**

We focus our efforts on getting to know our customers, offering products and services in accordance with their needs, striving for excellence and making customer satisfaction a priority in our service.

We conceive, design and market products and services of the highest quality, providing our clients with a differential value compared to the rest of the offers on the market.

We drive commitment to innovation.

**In our dealings with customers, we behave in a fair manner**

We communicate the characteristics of our products and services in a transparent manner, providing rigorous, truthful, complete and understandable information.

We respect the commitments we have made and we have integrity in our actions.

## PEOPLE'S HEALTH AND SAFETY ARE PARAMOUNT

**It is everyone's responsibility to make our ambition of zero accidents a reality.**

The prevention of occupational risks is for the INMOCEMENTO Group a differentiating element and an essential requirement to protect the health and safety of employees and collaborators. The INMOCEMENTO Group has a strategy and specific action plans for the prevention of occupational risks in each of its businesses, in line with the legislation in force in each country.

It is the duty of all employees to observe and monitor compliance with safety regulations and the use of protective equipment intended for this purpose.

### **You should be particularly vigilant**

- Do not take risks that could endanger the safety or health of others. Observe strict compliance with health and safety regulations in order to protect yourself and other employees or third parties.
- Responsible use of your assigned equipment, especially when performing risky activities, promoting compliance with risk protection practices.
- It is not permitted to work under the influence of alcohol or drugs. In the case of medication that may affect the safety of your work, consult the medical services.
- The INMOCEMENTO Group is committed to generating a healthier lifestyle culture through initiatives aimed at promoting physical exercise, healthy nutrition, health care and healthy habits, thereby reducing accident and absenteeism rates.

## WE PROMOTE DIVERSITY AND FAIR TREATMENT

### **Create a work environment that is fair, diverse and supportive of professional and personal development.**

Fair treatment is a principle of action. The Group develops programmes, internal procedures and actions aimed at creating an enriching working environment, free of discrimination of any kind and conducive to diversity.

Selection and promotion decisions in the INMOCEMENTO Group are always based on merit and on objective and transparent assessments.

### **Not tolerated**

- Direct or indirect discrimination on the basis of gender, race, age, nationality, religion, sexual orientation, disability, family origin, language, political ideology, political or trade union affiliation or any other characteristic that is not objectively related to working conditions, whether or not it is found in the applicable legislation in the jurisdiction of application.
- Harassment at work or sexual harassment.

## WE ARE COMMITTED TO OUR ENVIRONMENT

**Working towards sustainable development is part of our mission and we strive for efficiency in the use of resources and minimising impacts.**

The INMOCEMENTO Group carries out its activity under the premises of:

- Resource efficiency.
- Prevention of negative environmental impacts, protection of ecosystems and historical, cultural and archaeological heritage.
- The reduction of greenhouse gas emissions.

**We strictly comply with environmental legislation and act under the principle of prevention.**

The INMOCEMENTO Group cooperates with regulatory authorities to develop and promote equitable laws and regulations that protect the environment and undertakes and cooperates with projects to protect the natural environment. No communication with any government agency, official or representative, media and authorities shall take place without the approval of the relevant management.

## **You should pay particular attention to**

Know and promote the INMOCEMENTO Group's environmental policy within the scope of your functions and show your commitment to the criteria of respect and sustainability that it inspires. Adopt the best practices by contributing positively and effectively to the achievement of the established objectives. Strive to minimise the environmental impact derived from your activities and the use of the facilities, equipment and means of work placed at your disposal, making efficient use of them.

It contributes to promoting best practices in the collaborating companies, contributing the knowledge acquired and constantly monitoring and improving the development of the different activities in which they participate. It demands compliance with the environmental requirements applicable in each case.

**When in doubt, the precautionary principle should be applied.**

### **Preserve natural areas**

If, as part of your work in the INMOCEMENTO Group, you are involved in urban development, building or land transformation projects, make sure that they respect the relevant cultural, historical, artistic or natural values that may be affected.

### **Seeking efficiency**

It assumes, as behavioural guidelines, to minimise waste and pollution, to conserve natural resources and to promote energy saving and emission reduction.

## WE ENGAGE TRANSPARENTLY WITH THE COMMUNITY

### **Community investments must be transparent and properly documented.**

The INMOCEMENTO Group invests in the development of society and its citizens, transparently promoting and financing initiatives and projects that address relevant social needs through the Sustainability Policy.

Sponsorships, collaborations or donations made by the INMOCEMENTO Group will be granted according to objective criteria related to the activities of the INMOCEMENTO Group to entities of recognised prestige and ethical behaviour, which have the appropriate organisational structure to guarantee the good administration of the resources.

All collaboration or sponsorship, including those made in kind, must be documented and duly authorised, and, as far as possible, the use of the contribution made must be monitored in order to know the final destination or use of the contribution.

### **Donations to political candidates or political formations are not allowed .**

It is strictly forbidden for Group companies, either directly or through intermediaries, to make, directly or indirectly, donations, even in the form of loans or advances, to candidates or public officials, or to political parties, including federations, coalitions, groups of voters, foundations or entities related thereto. Exceptionally, and with the express authorisation of the chief executive of the head of the business, donations may be made to political parties in those countries in which this is expressly regulated by law and under the terms established therein, without in any case having the purpose of obtaining an undue advantage in business.

### **All sponsorships and donations must be authorised.**

Investments in society: sponsorships, collaborations, donations and volunteering must be authorised by the Communications Department.

This includes the provision of services or the granting of facilities, services or products to customers or suppliers.

## WE EXTEND THE COMMITMENT TO OUR PARTNERS IN BUSINESS

**In our relationships with suppliers, contractors, partners and collaborators, we seek to establish balanced and transparent frameworks of collaboration that promote stable, long-lasting and mutually beneficial business relationships.**

In the INMOCEMENTO Group we share our commitment to ethics and compliance, promoting advanced practices in occupational health and safety, and encouraging collaboration with those who accredit advanced social, environmental and ethical standards, either by adhering to this Code, by including specific clauses in contracts or by accrediting compliance models compatible with those of the INMOCEMENTO Group.

### Our partners, employees and suppliers must

**Demonstrate ethical behaviour** in business dealings and express their rejection of corruption, bribery and fraud.

**Protect** internationally recognised fundamental **human** and labour **rights** as set out in the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the Conventions of the International Labour Organisation.

**To demonstrate a high level of commitment** to compliance with occupational health and safety standards, ensuring a safe and healthy working environment and proactively implementing measures that contribute to minimising workers' exposure to risk.

**Respect the environment** in all its activities, not only by complying with current legislation, but also by developing its activities in such a way as to minimise negative environmental impacts and establishing sustainable environmental management. Specifically, when the supplier's activities are carried out at the INMOCEMENTO Group's facilities, the supplier must ensure that its workers are aware of and comply with the applicable internal and external environmental regulations.

**In order to comply with these principles, due diligence processes will be carried out, taking into account ethical aspects and the professional and economic suitability of those with whom we establish business relationships.**



**What is expected of all of us who work  
in the INMOCEMENTO Group?**

**The INMOCEMENTO Group will not tolerate any breach of the Code of Ethics and Conduct. No employee, regardless of level or position, is authorised to ask other employees to contravene the provisions of the Code.**

Failure to comply with this Code may lead to disciplinary action in accordance with labour legislation, in addition to any possible legal liabilities that may apply.

**Knows, understands and applies the behavioural guidelines set out in this Code, as well as the policies and procedures that develop and complement them.**

This Code does not cover every situation that may arise, but it sets out clear guidelines for conduct. Your obligation is to apply the principles underlying the Code in every decision making and, if in a particular case a doubt arises, you should consult the Compliance Committee and/or the Compliance Function.

**Before making any decision, ask yourself the following questions:**

Does it violate any laws or regulations?

Is it contrary to the values or policies of the INMOCEMENTO Group?

If my behaviour were/were to be made public to would  
be considered inappropriate or unprofessional?

Maintain a cooperative and responsible attitude in identifying situations of actual or potential non-compliance with the ethical principles and rules of conduct contained in this Code.

**Prevent misconduct from occurring. If you observe or someone informs you of misconduct, it is your duty to report it immediately through the Ethics Channel.**

## Ethical Channel

The Ethics Channel is a tool open to all to help identify potential breaches or violations of the Code of Ethics and Conduct, the Criminal Prevention Model and/or other internal rules of the INMOCEMENTO Group, in order to prevent potential weaknesses so as to strengthen the INMOCEMENTO Group's culture of compliance. Additionally, consultations and suggestions can be made to improve internal control.

The Ethics Channel is part of the Group's Internal Information System, which guarantees the effective treatment of any complaint received through the same, with full respect for the rights of the complainant, as well as the rights to the presumption of innocence and defence, honour and privacy of the persons reported, and which is governed by the provisions of the Internal Information System Policy and by the Procedure of the aforementioned System, established by the Board of Directors of INMOCEMENTO.

**Communications made through the Ethics Channel are received and processed by the Compliance Committee, guaranteeing their confidentiality, and are validly submitted anonymously.**

The Compliance Committee is composed of the corporate Compliance Officer, the Head of General Corporate Functions and the Head of the Legal Department.

### Research

The Compliance Committee shall investigate notifications diligently and promptly and take steps to resolve them. Information shall be analysed objectively and impartially.

### Anti-reprisal measures

It is strictly prohibited to take any action against an employee of the Group that constitutes retaliation for having made a report.

### False allegations

Appropriate disciplinary action will be taken when the internal investigation determines that the allegation is false and has been

formulated in bad faith.

You have the following channels to report any possible breach of the Code of Ethics and Conduct or the regulations that develop it:

**By post** Apartado de correos 19312, 28080 Madrid. Spain

Through **the INMOCEMENTO website** and, where appropriate, the websites of other Group companies.

By mail e-mail, a to address **[canaletico@inmocemento.es](mailto:canaletico@inmocemento.es)**

Additionally, verbally:

**By telephone / voice messaging** through the telephone number provided, where appropriate, in each of the companies of the INMOCEMENTO Group.

**By means of a face-to-face meeting**, within a maximum period of seven days from the informant's request.

Complaints can also be communicated through the different accesses to the Ethics Channel set up in the different countries, where applicable.

**Responsible declaration Informed  
and in agreement**

All employees and persons linked to any company of the INMOCEMENTO Group are obliged to know and comply with the Code of Ethics and Conduct and the Company is obliged to make it available to us and make it known.

The Compliance Committee shall determine the cases and frequency in which employees of any INMOCEMENTO Group company must reiterate their commitment to comply with the Code.

The Code of Ethics and Conduct is updated periodically in response to new regulatory requirements, improvements arising from reviews of the compliance model and best practices. Please consult the website ([www.inmocemento.es](http://www.inmocemento.es)) for the current version.