



INMO CEMENTO GROUP HUMAN RIGHTS POLICY

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0. VERSION CONTROL

Version	Date	Modifications
1	November 7 of 2024	Version version. Approved by the Board Board of Directors

1. PURPOSE

The group of companies of which INMOCEMENTO, S.A. is the controlling entity ("INMOCEMENTO Group" or the "Group") is engaged, among others, in the manufacture of cement and the development, management and operation of all types of real estate throughout the world. All of these activities are in increasing demand by the public.

The Company strives on a daily basis to be a benchmark in global, efficient and innovative solutions, while at the same time wishing to be perceived as a fair and compliant employer, a good partner and collaborator, and always with a responsible commitment to the communities in which it operates.

By means of this Human Rights Policy of the INMOCEMENTO Group (the "**Policy**"), aligned with the Guiding Principles on Business and Human Rights, approved by the United Nations Human Rights Council (2011), and with the Global Compact, the Group declares its commitment to respect the human rights contained in the United Nations Universal Declaration of Human Rights and those contained in the Declaration of the International Labor Organization (ILO), regarding the fundamental principles and rights at work, as well as in the so-called eight ILO fundamental conventions.

The Group understands that human rights must be protected and ensured by all States, but considers it essential that the itself, within its of influence, and in accordance with the legal framework of each country, must respect them and promote compliance.

In those cases where national legislation and international human rights standards conflict, INMOCEMENTO will respect the legal framework, seeking, however, to protect to the greatest extent possible, the provisions of the aforementioned international conventions.

2. SCOPE OF APPLICATION

The protection of and respect for human rights, as a fundamental element of the INMOCEMENTO Group's corporate culture and values, apply to all activities in which the company has financial or operational control, regardless of their nature and the place where they are carried out.

The INMOCEMENTO Group requires the same degree of protection among its partners, employees and suppliers, as provided for in the Group's Code of Ethics and Conduct.

3. COMMITMENTS

I. Freedom of association and collective bargaining

INMOCEMENTO considers collective bargaining to be the basis for dialogue between the company and its employees, and is committed to recognizing at all times the right of workers to freedom of association, and to collaborating constructively with the freely elected representatives of the workers, within the national legal framework.

II. Decent and remunerated employment

INMOCEMENTO ensures fair and favorable working conditions, dignified and remunerated employment, and guarantees the right to rest and leisure time, in accordance with the country's labor legislation.

INMOCEMENTO is committed to fair and satisfactory remuneration according to the local labor market, the employee's training, experience and responsibilities, and in accordance with the labor agreements and legislation of each country, including minimum wages, social benefits and overtime .

INMOCEMENTO opposes any type of violence, harassment or abuse in the workplace, complying with the regulations in force in each country, and ensuring dignified treatment of all individuals with whom it works.

III. Forced labor and child labor

INMOCEMENTO opposes forced or involuntary labor, the withholding of documentation, or any other form of modern slavery or servitude, as well as any form of torture, cruel, inhuman or degrading treatment.

INMOCEMENTO respects the rights of children and rejects child labor, in compliance with ILO Conventions 138 and 182.

IV. Diversity and inclusion

INMOCEMENTO rejects any discrimination based on race, color, sex, language, religion, political opinion, national or social origin, marital status, economic status, disability or any other personal condition.

V. Health and Safety

INMOCEMENTO ensures the safety of its workers and its operations, continuously improving working conditions and creating a safe and healthy working environment.

INMOCEMENTO undertakes to carry out all necessary actions to avoid compromising the safety, health and integrity of its customers and users.

VI. Data privacy

INMOCEMENTO is committed to the responsible use of personal data and information collected in the different international projects where it operates, taking special care with the data of its employees and customers.

VII. Respect for communities

INMOCEMENTO is committed to establishing respectful and credible relationships with the local communities where it operates,

by raising awareness of their rights in terms of natural resources, access to health care, education, culture and tradition.

INMOCEMENTO is committed to respecting the specific rights of indigenous communities, their structures, territories and resources, in accordance with national and international conventions and regulations, establishing procedures for dialogue and minimizing any impact on these rights.

INMOCEMENTO is committed to respecting the environment, valuing the life cycle of its activities, as well as promoting best practices and behaviors in the management of its consumption, waste and pollutant gas emissions.

4. DEVELOPMENT

In order to ensure that the basic principles contained in this Policy govern at all times the actions of the INMOCEMENTO Group in the area of human rights, and in accordance with the United Nations Guiding Principles on Business and Human Rights, the company will define and implement sufficient mechanisms to proceed with due diligence in terms of identification, prevention, mitigation and response.

In particular:

- Appropriate protocols shall be approved for the identification, monitoring and management, on an ongoing basis, of the human rights impacts of the INMOCEMENTO Group's activities.
- A human rights awareness plan will be developed for employees, and for the internal and external dissemination of this Policy.
- Initiatives will be defined to extend the commitments of this Policy to our partners and collaborators.

5. GOVERNMENT

The approval of the INMOCEMENTO Group's Human Rights Policy, as well as the supervision of its compliance, is the responsibility of the Audit and Control Committee of the Board of Directors, which is generally responsible for supervising the company's environmental and social policy.

The development of the commitments and their follow-up will be carried out through the INMOCEMENTO Group's Sustainability and the CSR or sustainability committees of the businesses.

While this Policy must be adhered to by all Group employees, it is the corporate directors and business managers in the different countries who are primarily responsible for the effective implementation of their commitments.

This Policy, like the rest of the Group's policies, is aligned with the highest internal standard, the Code of Ethics and Conduct, and with INMOCEMENTO's Compliance Model.

Any violation of the Policy must be reported through the Ethical Channel of the INMOCEMENTO Group, established in its Code of Ethics and Conduct.

Approved by the Board of Directors of INMOCEMENTO