



SUSTAINABILITY POLICY OF THE INMOCEMENTO GROUP

7 November 2024

INDEX

0. VERSION CONTROL	3
1. FUNDAMENTALS	4
2. PRINCIPLES OF ACTION OF THE INMOCEMENTO GROUP	4
3. SUSTAINABILITY PRIORITIES	5
1. Conservation and environmental protection	5
2. Positive social impact and development	6
3. Good governance, exemplary performance	6
4. STAKEHOLDER DIALOGUE	7
5. GOVERNANCE OF THIS POLICY	7
Board of Directors and Audit and Control Committee	7
INMOCEMENTO Group Sustainability Committee	8
Sustainability Committee of the business areas	8
The Sustainability Compliance Officer	8
6. REVIEW AND UPDATE	8

0. VERSION CONTROL

Version	Date	Modifications
1	7 November of 2024	Version 1.0. Approved by the Board of Directors

1. FUNDAMENTALS

INMOCEMENTO, S.A. (hereinafter "**INMOCEMENTO**" or the "**Company**") wishes to be a company recognised for its commitment to the development of the societies it serves and through the activities, goods or services it provides.

A strong corporate culture and values have enabled INMOCEMENTO's business to develop on the basis of long-lasting, transparent and mutually beneficial relationships with those stakeholders with which the group of companies of which INMOCEMENTO is the controlling entity ("**INMOCEMENTO Group**" or the "**Group**") interacts.

This Sustainability Policy of the INMOCEMENTO Group (the "**Policy**" or the "**Sustainability Policy**") sets out the commitments of the companies of the Group in relation to the framework of integrity and business ethics, respect for the environment and in relation to the contribution of value to the society in which the Group carries out its activities.

Its framework governs the development of the INMOCEMENTO Group's business activities in all the markets in which it operates.

The Sustainability Policy is inherent to the commitment and actions of all the members of the Group, in line with the demands of customers and society as a whole.

2. PRINCIPLES OF ACTION OF THE INMOCEMENTO GROUP

The shared values of the INMOCEMENTO Group are aimed at transmitting and instilling the principles of action to all the people who are part of it. They are the most important hallmarks of our organisation, whose Vision is 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.

The principles of action are intended to promote that all persons linked to any company of the INMOCEMENTO Group are guided by guidelines of behaviour with the highest level of excellence, and demands in the commitment to compliance with laws, regulations, contracts, procedures and ethical principles.

The company's values, which guide the principles of action and which keep all the people of the INMOCEMENTO Group connected to common objectives, are the following:

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.

3. SUSTAINABILITY PRIORITIES

The Sustainability Policy sets out the company's main strategic lines for sustainable development and the response to the main environmental, social and governance (ESG) challenges faced by the INMOCEMENTO Group.

This Policy establishes the general principles, and the framework of the company's ESG strategy, for the rest of the specific sustainability plans and policies of the INMOCEMENTO Group and its business areas.

Based on this structure and ESG model, the Company aims to respond to the sustainable requirements of its stakeholders, while contributing to the implementation of the 2030 Agenda, cooperating in the fulfilment of the Sustainable Development Goals (SDGs) and respecting the United Nations Global Compact, maintaining and consolidating the sustainable development of the societies in which it operates.

Our group commitment to sustainability will be based around three strategic ESG pillars:

1. Conservation and environmental protection

In the environmental field, our actions must be particularly respectful as we consider that the role of INMOCEMENTO, as the parent company of a group dedicated to real estate and cement activities, is to be part of the solution in terms of mitigation and adaptation to global warming, water supply and sanitation, waste management and the preservation of biodiversity.

The strategic lines to ensure the environmental sustainability of our activities are as follows:

- Promote INMOCEMENTO's leadership on climate action, moving towards a competitive low-carbon economy and promoting energy efficiency and responsible energy consumption.
- Apply the principles of the circular economy to make efficient use of resources, valorise waste management and increase the useful life of materials.
- Promote the responsible use, consumption and management of water resources, reducing water stress where we operate.
- Contribute to the maintenance of natural capital, promoting the conservation of biodiversity and supporting the recovery of ecosystems.

2. Positive social impact and development

In order to be a key player in sustainable progress, the INMOCEMENTO Group incorporates social action into its business strategy, contributing to social, cultural, economic and labour development and welfare, favouring job creation and improving the quality of life of the people and communities in which it operates.

The Company is aware that it plays an outstanding role in favouring the transformation of cities into inclusive, distinctive and innovative environments, based on a management that places people at the centre of its axis of action. The framework for promoting the social sustainability of our activities includes:

- Ensure the protection of human rights internally and throughout the value chain.
- Contribute to the development of the communities where we operate by promoting solidarity action, education and social investment.
- Boosting talent and empowering human capital, creating opportunities for personal and professional growth.
- Ensure the safety, health and well-being of people and working environments.
- Promote equality, diversity and inclusion, generating a real culture of respect, tolerance and equity.

3. Good governance, exemplary performance

In its commitment to good governance, the INMOCEMENTO Group aligns its guidelines with the main recommendations applicable to it and, in particular, with those that include sustainability among the competencies of the Board of Directors.

We work to our own higher standards of ethical behaviour than those in force in the jurisdictions in which we operate. This commitment is reinforced by

by our Code of Ethics and Conduct, which guides the actions of the INMOCEMENTO Group within a framework of integrity and business ethics, and is strengthened by a system of control and supervision, so that it is a benchmark of exemplary performance.

Our strategic lines of action to contribute to sustainability from the corporate governance that INMOCEMENTO has adopted are as follows:

- Maintain a robust model of compliance, ethics and integrity, ensuring responsible behaviour.
- Prevent and detect risks of non-compliance, with particular attention to illegal and unlawful criminal conduct.
- Adapt, to the extent deemed appropriate to the Company's shareholding structure, to best practices and recommendations of good governance.

4. STAKEHOLDER DIALOGUE

Our activities must better understand and connect with the real needs of citizens, and drive changes that promote cleaner, smarter and more inclusive development. To this end, we maintain an ongoing dialogue to help us understand the different expectations of all our stakeholders.

The INMOCEMENTO Group maintains various channels of communication, dialogue and participation with its stakeholders in order to interact in a transparent, honest, truthful and consistent manner, and as a means to learn and improve our business performance.

To strengthen engagement, we build relationships of trust, partnerships and alliances with our stakeholders, which enable us to mobilise and exchange knowledge and resources, and make it possible for us to continue to move forward and join forces towards the common goal of sustainable development.

5. GOVERNANCE OF THIS POLICY

Sustainability actions in the Group are directed by the company's highest governing bodies, i.e. the Board of Directors and the Audit and Control Committee, to which the Sustainability Committee reports, comprising the sustainability manager of the cement area, the sustainability manager of the real estate area and the Sustainability Compliance Manager.

Board of Directors and Audit and Control Committee

The Board of Directors of INMOCEMENTO is responsible for approving this Policy and the sustainability strategy, which will be set out in a master plan drawn up and approved periodically.

The Audit and Control Committee shall be responsible for supervising compliance with the Sustainability Policy and, in general, the environmental and social practices of the INMOCEMENTO Group.

On an annual basis, progress will be reported by the Company through its sustainability report, made available to the General Meeting of Shareholders.

INMOCEMENTO Group Sustainability Committee

The Sustainability Committee is the link between the businesses and the corporation in this area, proposing initiatives and reporting results to the Audit and Control Committee and the Board. It is made up of the sustainability manager of the cement area, the sustainability manager of the real estate area and the Sustainability Compliance Manager.

This management body is responsible for implementing the Sustainability Policy, approved by the Board of Directors, through the periodic master plan proposed by this Committee, and submitted to the Audit and Control Committee for prior approval.

Sustainability master plans will be designed to support the Company's strategic plans.

The proposal for the master plan to be submitted to the Audit and Control Committee for approval will involve the INMOCEMENTO Sustainability Compliance Officer and the Sustainability Committee, as well as other internal and external stakeholders.

Sustainability Committee of the business areas

These committees are responsible for developing, implementing and ensuring, in each business unit, compliance with the INMOCEMENTO Group's Sustainability Policy, in addition to the deployment of the corresponding master plan within their division.

Sustainability Compliance Officer

The Sustainability Compliance Officer will develop the systems for monitoring the results of the Company's sustainability practices. In addition, he/she will identify the risks associated with this matter and their management, and will coordinate INMOCEMENTO's Sustainability Committee, as well as other functions assigned by the Company's internal regulations.

6. REVIEW AND UPDATE

This policy may be reviewed and updated from time to time by the Board of Directors upon proposal of the Audit and Control Committee.