



POLICY OF PARTICIPATION OF THE INMO CEMENTO GROUP IN TENDERING PROCESSES FOR GOODS OR SERVICES

7 November 2024

INDEX

0. VERSION CONTROL	2
1. INTRODUCTION	3
2. PURPOSE AND SCOPE	3
3. RELATIONSHIP WITH OTHER POLICIES	4
4. GENERAL PRINCIPLES	4
a) Loyalty	4
b) Autonomy	4
c) Transparency	5
d) Responsibility	5
e) Regulatory compliance	5
f) Documentation	6
5. DEVELOPMENT OF SPECIFIC PROCEDURES	6
6. OBLIGATIONS OF THE INMOCEMENTO GROUP	7
7. OBLIGATIONS OF INMOCEMENTO GROUP EMPLOYEES.....	7

0. VERSION CONTROL

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

1. INTRODUCTION

Within the different services offered by the group of companies of which INMOCEMENTO, S.A. is the parent company ("**INMOCEMENTO Group**" or the "**Group**") in the market, it may, on occasion, participate in tender processes called by its clients.

It is important that all Group employees involved in such processes take special care to avoid actions contrary to the Group's principles or the law.

Firstly, with regard to the Group's ethical principles, the policy aims to ensure that the INMOCEMENTO Group's participation in tendering processes takes place in a manner consistent with the INMOCEMENTO Group's Code of Ethics and Conduct and, in particular, with the following values:

- a) **Integrity:** The INMOCEMENTO Group takes decisions in an honest, transparent and respectful manner, is consistent with them and strives to maintain an impeccable behaviour towards its stakeholders.
- b) **Customer service:** Quality is the basis of the Group's growth. For this reason, the INMOCEMENTO Group works in an exemplary and service-oriented manner in its relations with customers, placing its interests at the same level as those of its customers.

Secondly, with regard to compliance with the legal system, this policy aims to ensure correct compliance with the regulations applicable to tendering procedures (with particular reference to public procurement and antitrust regulations), minimising the risk of possible regulatory infringements, especially in the criminal (corruption, fraud, bribery, etc.) or antitrust (collusion with competing companies) areas.

2. PURPOSE AND SCOPE

The purpose of this policy is to establish the basic and common elements of the INMOCEMENTO Group for the preparation and submission of bids to competitive procurement processes, convened by public or private entities.

For the purposes of this policy, tendering means any competitive process for the offer of goods or services to a public or private customer where the regulations or the customer have established a specific procedure for the receipt and comparison of bids from several suppliers.

In short, this policy aims to ensure that the decision-making and management processes for the participation of INMOCEMENTO Group companies in public and private tenders are aligned with the general principles of the Group's Code of Ethics and Conduct and are always carried out within the framework of the law.

This Policy applies to all INMOCEMENTO Group companies. More specific requirements may be introduced for each country or business, if necessary or appropriate, but local or sectoral specificities shall not exempt the application of the principles and procedures of this document.

3. RELATIONSHIP WITH OTHER POLICIES

This policy applies concurrently with the anti-corruption, gift, agent and competition policies established by the INMOCEMENTO Group.

4. GENERAL PRINCIPLES

In general, and as a development of the values of the INMOCEMENTO Group Code of Ethics and Conduct, INMOCEMENTO Group employees shall apply the following principles to all their activities related to the preparation and management of bids in tender processes:

- Loyalty
- Autonomy
- Transparency
- Liability
- Regulatory compliance
- Documentación

a) Loyalty

The participation of any company of the INMOCEMENTO Group in a tendering process must always be carried out **in full loyalty to the clients and their interests**. This implies that no conduct shall be adopted in the bidding process that may frustrate or illegitimately hinder the objective of the bidding process.

In application of this principle, employees participating in these procedures must **know and respect the procurement procedure** established in the regulations or, in the case of private procedures, by the client itself. Neither the company nor its employees may carry out actions that could lead to circumvention of these procedures or, throughout the procedure, use communication channels other than those established in the rules that apply to the tender.

If, as a result of any irregularity detected in the tendering process, a **complaint or appeal** may be lodged, such complaint or appeal shall always be based on justified grounds, and under no circumstances may manifestly frivolous complaints or appeals be lodged.

INMOCEMENTO employees and executives shall always avoid situations that may give rise to a conflict between their personal interests and those of the INMOCEMENTO Group or the client. In this regard, and in line with the INMOCEMENTO Group's Code of Ethics and Conduct, actions that entail a future or present benefit for the employee or manager or their related persons are prohibited.

b) Autonomy

Without prejudice to cases in which the company competes in collaboration with

other entities, the decision to compete and the details of the conditions of the tender to be submitted shall be made in writing to the Commission.

submitted to any tendering process shall be decided autonomously and unilaterally by the company.

Under no circumstances may information regarding a tender be shared with competing companies. If a competitor sends a company employee information about its own decision regarding a tender, the employee shall immediately inform the Ethics Channel, which, in view of the circumstances, shall determine the best and most efficient course of action.

In the event that the offer involves or may involve collaboration with other entities outside the INMOCEMENTO Group (cases of subcontracting, joint ventures, joint ventures, etc.), the opportunity and need for collaboration deemed appropriate must be specifically analysed. In these cases, the INMOCEMENTO Group entity responsible for the process may not formalise any collaboration structure without having previously analysed and documented the need for collaboration with other entities and that it complies with current legislation. This justification must be made for each specific collaboration procedure, unless the establishment of a stable collaboration structure has been considered in the first place.

Similarly, any decision to contest the result of a tender procedure must always be taken autonomously by the company and for justified reasons. The same applies to joining an appeal, or complaint, lodged by an association of companies in the sector.

c) Transparency

Relations between the INMOCEMENTO Group and clients who invite tenders shall be governed by the principle of transparency. This implies that the company will communicate with the client in an honest manner and through the channels established for this purpose.

In the event that, for commercial, economic or other reasons, the company is not interested in participating in a process, it shall openly communicate this to the client, refraining from submitting artificial bids designed not to be selected.

Similarly, if the company's employees observe irregularities in the bidding process, they should bring these irregularities to the attention of the bidding company, through the Ethics Channel, even if these irregularities are attributable to the client's own staff.

d) Responsibility

Bids submitted by INMOCEMENTO Group entities in tendering processes shall be bids that meet reasonable commercial and economic criteria at the time the bid is submitted, and the instrumental use of tendering processes for illicit purposes shall be prohibited.

It is specifically prohibited to submit tenders with conditions which, on the basis of the information available at the time of their preparation, are manifestly frivolous.

e) Regulatory compliance

Compliance with the law is one of the basic principles of the INMOCEMENTO Group's actions. In the preparation and submission of bids, INMOCEMENTO Group companies shall always scrupulously observe compliance with current regulations and, in particular, with the regulations applicable to public sector contracts, anti-fraud and anti-corruption regulations, competition regulations and any other regulations which, depending on the jurisdiction in question, may be applicable.

In its commitment to regulatory compliance, the INMOCEMENTO Group has established an Ethical Channel for employees to report any circumstance that could imply a legal or regulatory infringement.

In order to comply with this principle, employees involved in the preparation and submission of tenders shall receive specific training appropriate to their responsibilities.

f) Documentation

Each INMOCEMENTO Group company, as appropriate, shall maintain a documented file of all tender processes in which it participates, even if it is not awarded the contract. This file should include, as a minimum, the tender documents, the tender submitted, the conclusion of the award, and any other relevant documentation. In cases where tender plans are developed, these plans shall also be archived.

In the event that the entity submits a tender that departs significantly from similar tenders submitted in the last three years, the reasons justifying this separation must be included in the file.

The files, if any, established shall be fully accessible for supervision by the Compliance department and for review by the Internal Audit department.

5. DEVELOPMENT OF SPECIFIC PROCEDURES

Each business area should, if necessary, specify this policy in specific procedures adjusted to its commercial reality in which, in view of the characteristics of the business, the decision-making sequence will be defined.

Each of these **specific procedures shall identify**, as a minimum:

- (i) The person(s) responsible for **taking the decision whether or not to tender**. Different levels of authorisation may be established depending on the size of the tender.
- (ii) The person(s) responsible for the **preparation and approval of the tender submitted**. As above, different levels of bid approval may be established depending on the amount of the tender or the conditions to be applied (e.g. discounts above a certain threshold, amount of guarantees required, collaboration schemes with competitors, etc.).
- (iii) The procedure **for the filing or recording** of proceedings.

The specific procedures of the business areas shall respect the principles set out in this policy. Exceptions or specificities may only be established when (i) they are necessary for the operation of the business, and (ii) they are expressly authorised by the compliance body.

Each business area of the INMOCEMENTO Group shall inform its employees of the specific procedures applicable to it.

6. OBLIGATIONS OF THE INMOCEMENTO GROUP

In application of this policy, the different business areas of the INMOCEMENTO Group shall:

- (i) Actively disseminate the **content of this policy and the specific procedures** that apply to it to all employees and managers who, directly or indirectly, may be involved in tendering processes.
- (ii) Establish effective **training programmes** so that all employees and managers who, directly or indirectly, may participate in tender processes are aware of all the obligations deriving from compliance with this policy. These programmes should include specific sections on the impact of public procurement, anti-fraud, anti-corruption and antitrust regulations, and their effectiveness should be reviewed periodically.
- (iii) Effectively monitor compliance with this policy through the establishment of **supervisory and audit controls and procedures**.

In addition, each subsidiary or division may introduce into its internal procedures additional supervisory measures appropriate to its business reality, and the approval of the Compliance department is required for the implementation of these additional measures.

7. OBLIGATIONS OF INMOCEMENTO GROUP EMPLOYEES

For their part, INMOCEMENTO Group employees are obliged to be aware of this policy and to use the resources that the company makes available to ensure compliance. In this regard, in addition to participating in training programmes, INMOCEMENTO Group employees are obliged to inform the company through the Ethics Channel of any incident or possible irregularity they may observe in relation to the preparation and submission of bids in tenders.