



# **INMO CEMENTO GROUP GIFT POLICY**

**7 November 2024**

## INDEX

<b>0. VERSION CONTROL.....</b>	<b>3</b>
<b>1. INTRODUCTION.....</b>	<b>4</b>
<b>2. SCOPE OF APPLICATION .....</b>	<b>4</b>
<b>3. GENERAL PRINCIPLES.....</b>	<b>4</b>

## 0. VERSION CONTROL

<b>Version</b>	<b>Date</b>	<b>Modifications</b>
1	7 November 2024	Initial version. Approved by the Governing Board

## 1. INTRODUCTION

Customary business or courtesy practices may result in the giving or receiving of promotional gifts, courtesies or hospitality in accordance with applicable customs and practices.

The group of companies of which INMOCEMENTO, S.A. is the controlling entity ("**INMOCEMENTO Group**" or the "**Group**") not only aims to ensure strict compliance with the Law at all levels, but also aims to add an additional element of exemplarity that places the Group's actions beyond any risk, not only of non-compliance, but even of mere ethical questioning. Honesty and respect for the law and the Group's rules must be a constant in the daily behaviour of all employees.

The Code of Ethics and Conduct of the INMOCEMENTO Group establishes a zero tolerance principle for bribery and corruption practices, and expressly prohibits influencing the will of third parties in order to obtain an advantage or favourable treatment. For this reason, it is necessary for the Group to establish a prudent regulation of the practice of giving and accepting gifts.

The INMOCEMENTO Group regularly contracts with a large number of suppliers, of various types and entities, to cover its needs for goods, raw materials and services, which increases the need to observe rules of conduct that remove any shadow of doubt from the company's actions regarding its ethical commitment. In this sense, the INMOCEMENTO Group's commitment to the principles of free competition and its own interest in ensuring that its contracting processes are effective also impose the need to maintain a professional and objective relationship with potential suppliers.

In light of these issues, the INMOCEMENTO Group has developed this gift and hospitality policy (the "**Gift Policy**" or the "**Policy**"), which is intended to set out clear principles regarding the giving or acceptance of gifts and hospitality by Group companies.

## 2. SCOPE OF APPLICATION

This Policy applies to all the companies that make up the INMOCEMENTO Group, as well as to all its employees. 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 set out in this document.

## 3. GENERAL PRINCIPLES

For the purposes of this Policy, a gift is considered to be any object, regardless of its origin, nature or characteristics, that is given free of charge and voluntarily within the framework of a social relationship. The concept of gift includes hospitality, understood as invitations to cultural or sporting events and shows, social and festive events, meals or trips, provided that they are not institutional, technical or training-related.

Gifts may be given or received on an occasional basis as long as they are merely a courtesy, are in accordance with the practices, customs and usages of the business and the territory, and are reasonable.

Special attention should be paid to such actions, avoiding any circumstance that could give rise to doubts about the impartiality, objectivity or legality of the behaviour of the Company and its employees.

Therefore, gifts shall always be received or given in a transparent manner and on an occasional basis, and no employee of the INMOCEMENTO Group may accept or give a gift that does not comply with the following principles:

- a) **Legitimacy in content:** The gift offered or received must be legitimate in terms of its content, i.e. it must not involve or include items or activities that are prohibited by law or may be considered inappropriate or unprofessional. In addition, all gifts given must comply with this Gift Policy.
- b) **Legitimacy in its motivation:** The gift must not be aimed at or seek to obtain future favourable treatment from the INMOCEMENTO Group towards the person or entity making the gift or from said person or entity in favour of the INMOCEMENTO Group. In this regard, and to avoid any doubts in this regard, when accepting or receiving a gift, gifts that, due to coincidence in time or for other reasons, may be perceived externally as being associated with the intention of influencing professional decisions shall be avoided.

In any case, each INMOCEMENTO Group business will establish the relevant controls in relation to gift giving.

- c) **Reasonableness:** The gift must be reasonable and appropriate to social conventions, custom and practice commonly accepted in the different parts of the world where the INMOCEMENTO Group does business. Likewise, the gift must be proportionate to the existing relationship between the INMOCEMENTO Group and the customer or supplier to whom it is offered or from whom the gift is received. Each business area will establish the relevant controls for gift giving.

As a general rule, gifts provided are considered to be those that have a reasonable value, understood as gifts with a value not exceeding 150 euros, or the corresponding currency. In relation to gifts given by employees of the INMOCEMENTO Group to third parties, the limit of 150 euros applies to the aggregate value of all gifts, invitations or hospitality received by the same person in a period of six months. In relation to gifts received by employees of the INMOCEMENTO Group, the limit of EUR 150 applies to the aggregate value of all gifts, invitations or hospitality received from the same company or entity in a period of six months.

In the case of hospitality, hospitality services are considered reasonable, taking into account the location, context and nature of the event, if they do not exceed 75 euros per person.

Both internal and external monitoring or audits of gift and hospitality expenditures may be conducted to ensure proper compliance with this Policy.

Gifts involving cash, goods that can be easily settled in cash or comparable alternatives (e.g. gift cards or discounts in physical or online commercial establishments) may not be accepted or given. Nor shall gifts be accepted or given to persons who are outside the business relationship between the INMOCEMENTO Group and its customer or supplier.

Gifts may also not be made or accepted through related persons, meaning spouses (or similar), ascendants, descendants and siblings.

- d) **Unilaterality:** Gifts may not be requested or given to third parties outside the INMOCEMENTO Group in the event that these gifts have been previously requested.