



Anti-Corruption Policy

Calucem 
by Molins^{co}

1. Subject

The Board of Directors of Cementos Molins, S.A. is responsible for defining and approving policies that form an integral part of the corporate governance system, including this anti-corruption policy (hereinafter referred to as the "Policy").

The policy aims to establish guidelines for action to prevent the commission of any form of corruption, both nationally and internationally.

The policy was developed with reference to UNE-ISO 37001, on anti-bribery management systems, and UNE 19601, on criminal compliance management systems.

2. Purview

This Policy applies to Cementos Molins, S.A. (hereinafter referred to as "Molins") and to all national and international companies individually controlled by Molins ("Subsidiaries").

In national and international companies where Molins has no control or control is shared ("Company Portfolio"), persons acting as representatives of Molins will promote the implementation of the principles and guidelines consistent with those set forth in this Policy.

This Policy applies to all employees, officers and members of Molins' board of directors, as well as third parties associated with Molins (hereinafter, and solely for the purposes of the provisions of this Policy, defined as "Associates").

3. Report non-compliance

Any incident or non-compliance with the principles set forth in this Policy must be reported through the Ethics Channel. Any non-compliance will be sanctioned by the Ethics and Compliance Committee in proportion to the gravity of the facts, regardless of any other legal consequences that may result.

4. Definitions

For the purposes of this Policy, the terms and concepts used shall have the following scope:

- **Corruption:** breach of duty in exchange for obtaining or promising to obtain benefits or advantages of any kind to which one is not entitled. Any practice that involves or has the potential to engage in the commission of corrupt acts is considered corrupt.

Corruption risks can arise in interactions with private individuals or the public sector, resulting in the following modalities:

- **Private corruption:** if the person seeking and/or for whose benefit the gift, benefit or advantage is granted is an executive director, administrator, employee or associate of a company, association, foundation or organization.
- **Public corruption:** if the person requesting and/or for whose benefit the gift, benefit or advantage is granted has the status of a public official.
- **Civil servant:** anyone who, by direct provision of law, election, appointment by a competent authority or by virtue of an employment relationship, participates in the exercise of public functions in national, foreign or international public or semi-public organizations, in any area of administration.

Public officials include, for example, and without prejudice to others who may be similar or designated under applicable law, all individuals holding elected office, political offices, career officers, judges, prosecutors, police officers, candidates for public office, political parties and their staff, notaries and registrars, individuals employed by or working for any public entity, or companies or organizations wholly or partially controlled by side of the public body. For the purposes of this Policy, public officials also include their relatives.

- **Conflict of interest:** a situation in which personal, social, professional, financial or other relationships interfere or have a high potential to interfere with the objective professional decision-making process of the Associates, or their responsibilities to society.

5. Anti-corruption and anti-bribery objectives

Molins, in his commitment to zero tolerance for corruption and bribery, rejects any behavior that could be considered corrupt or bribery.

In order to mitigate the risks of corruption and bribery, the following objectives have been set:

- Promote an ethical business culture based on integrity and transparency.
 - Ensure that Associates know and adhere to compliance systems, especially anti-corruption policies.
 - Ensure that this policy is reviewed periodically to keep it updated and in compliance with applicable regulations.
 - Maintain effective controls and continuous improvement measures to prevent bribery and corruption, and implement action plans that strengthen compliance with the compliance system.
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- Respond diligently and in accordance with applicable legal regulations to every possible case of bribery or corruption, reported through established channels.
- Ensure that those at particular risk renew their ethical, anti-corruption and anti-bribery obligations every two years and in writing.
- Provide the necessary communication and training on anti-corruption and anti-bribery for all Associates, especially those who are particularly exposed to the risk of corruption and bribery.
- Ensure that the necessary selection and recruitment measures are in place to avoid the inclusion of persons who may pose a risk to the integrity of society.

6. Prohibition of Corrupt Practices

It is totally forbidden to commit any behavior that could be considered corruption, in any form and modality.

6.1 Prohibition of corrupt practices in relations with the private sector

Molins does not permit its Associates to receive, solicit or accept, either directly or through an intermediary, any unwarranted promise, benefit or advantage of any nature, nor does it permit an offer or promise to obtain it, in compensation for unduly favouring another in the procurement or sale of goods, in the contracting of services or in any business relationship.

It is also prohibited to promise, offer or grant, directly or through an intermediary, to the managers, administrators, employees or associates of another company any undue advantage or advantage, as compensation for obtaining undue favouritism in the procurement or sale of goods, in the contracting of services or in any business relationship.

In business relationships and competitive processes between several suppliers, Associates must base their contracting on objective criteria and prioritize transparency, in accordance with the provisions of the Procurement Policy. If associates involved in any way in the selection, assessment and/or contracting of suppliers find themselves in a potential conflict of interest, they must immediately report this to the Compliance Officer or through the Ethics Channel.

6.2 Prohibition of corrupt practices in relations with the public sector

No Molins Associate or any person acting on their behalf or interest shall promise, offer, or deliver, directly or indirectly, any gift, offer, gift, advantage, or any other type of improper compensation to a public official or person engaged in the exercise of public functions, or to comply with a request for a gift or compensation made by them.

6.2.1 Payments for acceleration

Molins prohibits its Associates from so-called expedited bribes, defined as small payments made to an authority or public official in order to secure or expedite the performance of an action to which the payer is legally entitled.

6.2.2 Relationship with public authorities through third parties

Molins wants the commitment to ethics and legality in matters of anti-corruption and bribery to be assumed by third parties with whom the company cooperates. To this end, Molins develops internal policies, in particular the Supplier Code of Ethics, Procurement Policy and Supplier Approval Processes, to inform third parties of the standards required in terms of compliance with the law and to encourage third parties, in particular our suppliers, not to adopt practices or behaviours that could be considered corrupt. In this regard, Molins informs these third parties that contracting in the context of corruption is not accepted or tolerated.

Molins associates must also, at all times, respect the principle of zero tolerance for corruption. In this sense, they must immediately report the commission of any corrupt practice by a third party in their activities with Molins.

6.2.3 Impact on public authorities or functions

Molins completely prohibits its Associates from taking advantage of any personal relationship with a public official or authority to obtain any undue advantage or benefit for themselves or for Molins, either directly or indirectly. Likewise, Molins prohibits its Contributors from accepting compensation claims from third parties that offer to exert influence on the conduct of a public official or authority.

6.3 Duty of transparency

In accordance with its duty to act in a transparent manner and to prevent and detect irregularities, Molins documents all financial and commercial operations it conducts, keeping its books and accounting records up to date. Likewise, all relations with the public sector are duly documented.

7. Gifts & Hospitality

Within the framework of this Policy, and in the context of business and professional relationships, gifts mean any gift or value given or received openly and transparently as a symbol of gratitude. Likewise, hospitality is understood as any attention or invitation that is offered or received in the context of a business relationship.

On the other hand, in the context of political contributions, donations to political parties and trade unions imply monetary or non-financial donations (such as the provision of facilities, products or services) that are made with the intention of supporting political parties, candidates or political initiatives.

7.1 Guidelines for Molins Associates:

7.1.1. Gifts and hospitality that are allowed to give or receive, both in the public and private sectors:

- Business gifts or invitations as part of a legitimate business or promotional activity, as well as the gift of advertising or courtesy items of symbolic value.
- Sponsorship of activities and initiatives carried out exclusively for advertising purposes.
- Donations for charity and humanitarian purposes.

In addition, the following conditions apply to the offer or acceptance of permitted gifts:

- They must not be given with the intention of influencing a third party or to obtain an undue benefit;
- They may not be given for the purpose of obtaining or exchanging services or for obtaining personal services;
- They must be received or given publicly, transparently and openly; and
- They must not give rise to an actual or potential conflict of interest.

7.1.2 Gifts and hospitality that are forbidden to give or receive:

- Accepting, giving or offering gifts or hospitality to any public official, other than courtesy gifts of symbolic value, which are proportionate and reasonable according to local practice and are given sporadically for the purpose of legitimate or socially acceptable interest.

In addition, it is expressly prohibited to provide a personal address or any other address other than that of Molins to suppliers and other business associates for the receipt of gifts, hospitality or other attentions.

7.2 Economic reasonableness

The offer or giving of gifts must have a symbolic, reasonable value and be adapted to the social customs and practices that are predominantly accepted in the place where it is performed.

In Cementos Molins, S.A. and Subsidiaries located in Spain, the maximum acceptable value is set at eighty (80) euros per person receiving or giving a gift (calculated in a single delivery or accumulated annually). This amount may be increased according to the official inflation index from the year of approval or update of the Policy.

In Subsidiaries not located in Spain and in Portfolio companies, the amount in question is set in the policies and protocols applicable at local level in each company, always setting an amount that is reasonable and adapted to socially accepted customs and practices, and must comply with this Policy.

7.3 Events & Hospitality

Invitations received to participate in sporting events, expensive stays separate from Molins activities, or events of similar importance or amount must be declined. Similarly, it is prohibited to offer such invitations to authorities, public officials, or individuals.

Events attended by Molins associates must have a primarily professional goal. Corporate considerations are limited to those that are socially and reasonably appropriate. For example, occasional meals are considered socially appropriate, as long as the prices of such meals are low or moderate and in line with the current cost policy.

Hospitality may not extend beyond what is reasonable after the event, nor may it include sponsorship or organisation of entertainment activities (e.g. sports, recreational, etc.). Hospitality must be limited to the inclusion of strictly necessary logistical means, in any case reasonable and moderate, which allow the professional to participate in the event and not any other expense.

In case of doubt about accepting or rejecting an invitation, the employee must consult the Compliance Officer.

7.4 Political donations, sponsorships and donations

7.4.1 Political donations

It is completely prohibited to make political donations on behalf of Molins to political parties or any of their members or candidates.

If members of the Board of Directors, Molins governing bodies, or Associates make personal donations to political parties or any of their members or candidates, Molins is not responsible for this and remains neutral. In this case, the Contributors in question must not, under any

circumstances, associate their personal activities with a professional or employment relationship with Molins.

As a general rule, Molins does not make donations to foundations and entities affiliated with or dependent on political parties.

7.4.2 Donations and Sponsorships

Donations must be directly related to the achievement of the goals set in the area of social responsibility and relations with local communities of Molins, and must never have a commercial or contractual interest. Donations must be reported in advance to the Corporate Business Development and Sustainability Department and then approved by the Board of Directors of Cementos Molins, S.A.

Sponsorships of any nature must have a legitimate interest and be consistent with the ethical principles of Molins. Sponsorships must be channeled and managed by the communications department and then approved by the CEO.

To ensure that payments are made for a genuine and justified operation, in the case of a donation or sponsorship, this will be duly documented. In this sense, donations and sponsorships should never be made in cash or paid to an account other than that of the institution to which they are performed.

8. Awareness and Training

Molins provides anti-corruption and anti-bribery training for all Associates, especially those who are particularly at risk of corruption and bribery. This training must cover, among other things, the following aspects:

- The principles and guidelines of conduct set out in the Anti-Corruption Policy and their duty to adhere to them.
- The risk of bribery and corruption that exists in every area and the consequences of non-compliance, both for the individual who violates the regulations and for society.
- The circumstances in which corruption situations can occur, as well as the way to recognize corruption risk indicators.
- A way to prevent, recognize and respond to requests or offers for bribery.
- The need and importance of their contribution to the effectiveness of the Compliance System, as well as reporting any reasonable suspicion of acts that could qualify as corrupt. In this sense, the training should include information on how and to whom to communicate

any concerns or concerns they may have regarding the prevention of corruption, as well as on the use of the Molins Ethical Channel.

- Information on the resources available to them for the prevention of corruption.

Trainings on compliance, anti-corruption and bribery are conducted periodically, as well as whenever it is considered appropriate and necessary, such as in the case of assigning new functions to Associates or due to changes in the activity or structure of the organization.

9. Documentation Information

Molins documents all information generated under the Compliance System, in particular communications received regarding non-compliance, and the subsequent analysis and investigation of reported facts. The obligation to document information also applies to any information received outside the company.

It shall be ensured that the documented information is suitable for use at the time and place where it is needed, and that it is properly protected, for example, against loss of confidentiality, improper use or loss of integrity.

10. In-depth analysis

To detect and prevent risks of corruption and bribery, Molins has established due diligence processes applicable to certain levels of risk. Due diligence procedures apply to certain Company Associates, i.e. personnel at particular risk; on certain transactions, projects and activities; and to certain categories of business partners.

11. Bribery and corruption risk assessment

Molins regularly conducts bribery and corruption risk assessments, conducted by the Compliance Officer, which:

- It identifies the risk of bribery and corruption that the company can reasonably foresee due to the activities it performs.
- They analyze, assess and prioritize identified risks of bribery and corruption.
- It assesses the adequacy and effectiveness of existing controls to mitigate detected and assessed risks of bribery and corruption.

- It calls for continuous improvement of the Compliance System and review to ensure compliance with the System, as well as its sufficiency and effectiveness in mitigating the risk of bribery and corruption.

In any case, the information collected during the assessments is duly documented to prove that the bribery and corruption risk assessment has indeed been carried out, and that the results are used to improve the Compliance System.

12. Approval, entry into force and revision

This Policy has been approved by the Board of Directors of Cementos Molins, S.A. and has entered into force on November 29, 2023.

The Compliance Department is responsible for ensuring the proper implementation and appropriateness of this Policy and will therefore inform Contributors of the principles of operation and periodically review its content. Audits will be subject to approval by the Board of Directors, after validation by the Audit and Compliance Committee, with immediate effect upon publication.

12.1 Audit Minutes

Internal reference	Version	Update Date	Subject matter of the audit
P.06.2025	2	29.01. 2025	Updating and standardizing the policies of the Corporate Management System.