



Competition policy

Calucem 
by Molins[®]

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 competition policy (hereinafter referred to as the "Policy").

The policy aims to establish mandatory principles of action in order to comply with competition rules.

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 control is not wholly in the hands of Molins 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. Principles of operation

Molins is firmly committed to maintaining effective competition in the markets, ensuring compliance with competition regulations at all times. To this end, the following general principles of operation have been defined:

- To respect and comply, at all times, with the competition regulations in force, in particular those applicable in the territories in which we operate.
- Comply with Molins' internal guidelines and regulations.
- Implement all necessary measures to avoid and prevent commercial activities that could constitute an infringement of competition rules.

- Avoid any agreement that may involve fixing prices and/or commercial conditions – cartels. Agreements between competitors that could involve market and/or customer sharing should also be avoided.
- Avoid exchanging sensitive commercial information with competing companies.
- Avoid any agreement that may involve fixing prices and/or commercial resale terms between manufacturers and distributors.
- Avoid any abuse of dominant position.
- Reject any practice that could be considered collusive or abusive, restrictive or contrary to competition rules.
- Adhere to an internally established procedure for seeking membership of Molins in professional associations. Also, adhere to the expected guidelines of behavior within the association.
- In the event of an inspection by national or international competition authorities, cooperate diligently and transparently with these authorities.
- To design and implement trainings, tailored to the needs of each business and their respective sectoral areas of activity. Also, to provide access to these trainings for Associates who require greater specialization in this field.

5. Approval, entry into force and revision

This Policy was approved by the Board of Directors of Cementos Molins, S.A. and entered into force on May 15, 2017.

The Compliance Department is responsible for ensuring the proper implementation and adequacy of this Policy and will therefore inform Associates 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.

5.1 Audit Minutes

Internal reference	Version	Update Date	Subject matter of the audit
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P.07.2025	3	29.01. 2025	Updating and standardizing the policies of the Corporate Management System.
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