



Ethics Line policy

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1. Object

The Board of Directors of Cementos Molins, S.A. is responsible for defining and approving the policies that form an integral part of the Corporate Governance System, including this Ethics Line policy (hereinafter, the “Policy”).

The purpose of this Policy is to develop the functioning of Molins' Internal Information System and to establish the procedure for managing communications received, whether verbal or written, through the Ethics Line or any other means enabled for this purpose. It also regulates the guarantees of the investigation process and, where applicable, the disciplinary regime.

2. Scope of application

This Policy applies to Cementos Molins, S.A. (hereinafter, “Molins”) and to all individually controlled national and international companies of Molins (“Subsidiary Companies”).

In national and international companies where control is not held or control is shared (“Investee Companies”), the persons acting in them as representatives of Molins shall promote the implementation of principles and guidelines consistent with those set out in this Policy.

This Policy applies to all employees, executives, and members of governing bodies, as well as stakeholders and third parties related to Molins (hereinafter, and for the exclusive purposes of this Policy, defined as “Collaborators”).

3. Reporting non-compliance

Any incident or breach of the principles established in this Policy must be reported through the Ethics Line.

Likewise, those subject to this Policy have a duty to report, through the Internal Information System, among other actions, any acts or omissions that may constitute:

1. Criminal offenses or serious or very serious administrative offenses. In any case, this shall include all those that involve financial loss to the Public Treasury and Social Security.
2. Infringements of European Union law, provided that (i) they fall within the scope of the acts listed in Article 2 of Directive (EU) 2019/1937, (ii) they affect the financial interests of the European Union, or (iii) they affect the internal market by infringing competition or corporate tax regulations.
3. Human rights violations.

4. Any violation of Molins' Code of Ethics and other policies of the Corporate Governance System, including conduct that is not aligned with the company's values and situations of discrimination, harassment, or that violate the principles of equality and diversity.

All communications will be investigated in accordance with the Internal Investigation Protocol and, where appropriate, any breach will be sanctioned by the Ethics and Compliance Committee in a manner proportionate to the seriousness of the acts, without prejudice to any other consequences that may arise from applicable laws.

4. Applicable regulations

This Policy is applied in strict compliance with applicable local and international legislation on the protection of whistleblowers. In this regard, the Policy is aligned with the requirements established in the current Spanish Criminal Code and Law 2/2023 of February 20, which regulates the protection of persons who report regulatory violations and the fight against corruption, in force in Spain on the date of its publication.

This Policy will be updated to reflect any legislative changes that occur in Spain and in the countries where Molins operates, as well as the criteria established in the rulings of the Spanish Supreme Court, the Spanish Constitutional Court, the Court of Justice of the European Union, and the European Court of Human Rights. It will also follow the guidelines set out in the guides, reports, and resolutions of the national and European public administration.

5. Definitions

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

- **Ethics Line:** this is the internal communication channel developed by Molins and enabled on the intranet and on the websites of Molins and its subsidiaries to encourage the disclosure of information, either verbally or in writing, regarding suspected violations of the law and internal regulations. This channel is integrated into the Internal Information System.
- **Internal Information System:** Molins' system for receiving and managing communications concerning breaches of the law and/or internal regulations, covering both the Ethics Line, the person responsible for the system and the procedure for managing such communications.
- **Breaches of the law:** any action or omission that may constitute a breach of European Union law, or a serious or very serious criminal or administrative offense under Spanish law, or a violation of human rights, as set out in section 2 (paragraphs 1, 2, and 3) of the Policy.

- **Whistleblower:** any Collaborator who uses the Internal Information System to issue a communication regarding a violation in accordance with this Policy, who is treated and protected in accordance with Law 2/2023 of February 20. In addition to active Molins Collaborators, this includes: a) future Collaborators who are in the selection process; b) volunteers, interns, and workers in training periods, regardless of whether or not they receive remuneration; c) Collaborators who have terminated their employment relationship with Molins; and d) workers' representatives.
- **Persons related to the whistleblower:** individuals who assist the whistleblower during the investigation process, co-workers, family members, and other third parties who may suffer retaliation because of their relationship with the whistleblower, as well as legal entities with which the whistleblower has any type of employment relationship or holds a significant stake in the capital or voting rights. None of these people may suffer any type of retaliation in the same way as the whistleblower.
- **Retaliation:** any act or omission that is prohibited by law or that, directly or indirectly, involves unfavorable treatment that places the person suffering it at a particular disadvantage with respect to others in the workplace or professional context. Some examples of retaliation are: suspension of the employment relationship, dismissal, termination or non-renewal of the employment relationship, demotion or denial of promotion, substantial modifications to the employment contract, damage to reputation or economic losses, coercion, harassment or ostracism, negative evaluations or references in professional performance, inclusion on blacklists, denial of training, discrimination or unfavorable treatment.

6. General matters relating to the Ethics Line

In accordance with its corporate commitment to due diligence and regulatory compliance, Molins has an Ethics Line accessible to Employees and other stakeholders, in which communications regarding potential violations of the law or internal regulations are received.

In addition to communicating through the Ethics Line, the Whistleblower may report any violation of the law to the Independent Whistleblower Protection Authority, either directly or after communicating through the internal Ethics Line. Additionally, where appropriate, it may also report to the competent bodies of the European Union.

The guarantees and protection measures defined in this Policy are applicable to Whistleblowers who have obtained information about violations in a work or professional context. The guarantees and protection measures are also applicable to Collaborators, in accordance with the defined

scope, and specifically to the legal representatives of workers in the exercise of their functions of advising and supporting the Whistleblower, as well as to people related to the Whistleblower.

The Ethics Line is accessible through the following link (<https://molins.integrityline.com>), as well as through the intranet, the corporate website of Cementos Molins, S.A. and, on the websites of the Subsidiary Companies and Affiliate Companies.

In the event that a Collaborator receives information about a report submitted through the Ethics Line or by any other means, they must maintain the utmost confidentiality, avoiding, among other things, disclosing any information that could identify the Whistleblower, the reported party, or third parties. Furthermore, if an employee receives a report, they must immediately forward it to the Compliance Officer through the aforementioned channels. Any breach of the duty of confidentiality shall be considered a very serious offense.

Communications should preferably be made nominally, identifying the Whistleblower, in order to facilitate efficient management of the investigation of the reported events. However, anonymous communications may also be made and will be processed.

The Ethics Line itself provides a case identification number which, together with the established password, is used to access the mailbox, where messages can be sent to the Compliance Officer, even anonymously. Likewise, the Compliance department may use this mailbox to request additional information from the reporting person.

Molins keeps a record of communications that includes, at least, the communications received, and the investigations carried out, ensuring the confidentiality of the record. This record may only be provided to the competent authority upon reasoned request. The information contained in the communications record will only be kept for as long as necessary and proportionate for the purposes of complying with the law and, in any case, for no longer than 10 years.

7. Responsible for the Internal Information System

The Compliance Officer is the Responsible for the Internal Information System and is therefore the recipient and manager of communications received through the Ethics Line. Additionally, he is the responsible for leading any investigations that may be carried out.

The person responsible for the Internal Information System has been appointed by the Board of Directors, and this appointment must be notified to the Independent Authority for Whistleblowers.

Although the Compliance Officer is the internal recipient of communications, the initial reception service for these communications has been outsourced to a specialized external service provider in order to help provide the Ethics Line with adequate guarantees of independence,

confidentiality, data protection, and secrecy of communications. This provider has signed the corresponding data processor contract. The initial reception of communications by an external third party does not undermine the guarantees and requirements of the Internal Information System or unduly attribute responsibility for it.

Both the Compliance Officer and the Ethics and Compliance Committee must perform their duties independently and autonomously from the other bodies of Molins, must not receive instructions of any kind in the exercise of their duties, and must have all the necessary human and material resources to carry out their functions.

The Compliance Officer may authorize individuals from the Compliance department to assist in managing the Ethics Channel, as well as in investigating communications. Likewise, during the course of investigations, the Compliance Officer may rely on personnel from Human Resources or other areas which, due to their expertise or role, are necessary. The aforementioned authorized individuals must comply with all the obligations set out in this policy and in the Internal Investigations Protocol.

8. Guarantees of the Ethics Line and the Investigation Process

All communications received through the Ethics Line shall be governed by the following guarantees:

- i. **Security measures:** The Ethics Line has appropriate technical and organizational security measures to prevent the risk of disclosure, unavailability, and loss or destruction of information, ensuring the confidentiality, availability, and integrity of received communications.
- ii. **Confidentiality:** The confidentiality of the identity of the Whistleblower, the reported person, and any third party mentioned in the communication is guaranteed, as well as the facts mentioned, with access limited to authorized personnel.
- iii. **Privacy - personal data:** The processing of personal data is carried out in accordance with current data protection legislation.
- iv. **Diligent and reasoned response:** Communications are answered within the established deadlines and are sufficiently reasoned, addressing the issues raised.
- v. **Absence of conflicts of interest:** Communications are handled impartially and objectively, based on the facts, and avoiding conflicts of interest where applicable.

Whistleblowers additionally have the following **rights**:

1. **Confidentiality:** The Whistleblower has the right not to have their identity disclosed without their express consent, whether or not they provide their contact details and even if their identity is later discovered. Their identity must not be disclosed to anyone outside the Ethics and Compliance Committee and other authorized personnel, except when disclosure is a necessary and proportionate legal obligation or required as part of a judicial investigation or proceeding. In such cases, the Whistleblower will be informed that their identity will be revealed, unless such notification could compromise the investigation or judicial process.
2. **Anonymity:** The Whistleblower may submit the report either by providing their personal data or anonymously, without revealing their identity.
3. **Protection from retaliation:** The Whistleblower and people related to them shall never suffer any form of retaliation for having submitted a report responsibly and in good faith. Good faith is understood to mean: a) they had reasonable grounds to believe that the information reported was true and based on reasonable indications at the time of reporting, even if no conclusive evidence was provided; and b) the report was made in accordance with this Policy. The channel must not be used in an abusive manner or for purposes other than those intended. The submission of false, malicious, or deliberately inaccurate reports may result in the adoption of disciplinary measures in accordance with applicable law. However, the Whistleblower may only be sanctioned if the report was made in bad faith, with reasonable indications that the information was false and not truthful. The Ethics and Compliance Committee, along with the relevant departments, will establish appropriate follow-up actions to ensure compliance with this guarantee.

The following communications are expressly excluded from protection:

- a. Those that have been dismissed for any of the following reasons:
 - i. The reported facts lack credibility.
 - ii. The reported facts do not constitute any violation.
 - iii. The reported facts are clearly unfounded or there are indications that the information was obtained through the commission of a crime, in which case an investigation will be opened regarding those latter facts.
 - iv. The reported facts do not contain new and significant information about a violation compared to previous communication that has already been investigated, unless new factual or legal circumstances justify a different follow-up.
 - b. Communications concerning interpersonal conflicts.
 - c. Communications based on facts that are already public or are mere rumors.
 - d. Communications whose facts do not constitute violations of the law or internal regulations.
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4. **Infomation:** The Whistleblower will receive an acknowledgment of receipt within a maximum period of seven (7) calendar days from the moment the communication is received through the Ethics Line, unless doing so could jeopardize the confidentiality of the communication. They will also be informed about the conclusion of the investigation and, where possible, of the measures planned or adopted.

The **reported persons** additionally have the following **rights**:

1. **Confidentiality:** The reported person has the right not to have their identity disclosed without their express consent to anyone outside the Ethics and Compliance Committee and other authorized personnel, except when disclosure is a necessary and proportionate obligation imposed by applicable law or required in the context of a judicial investigation.
2. **Presumption of innocence and respect for honor:** The reported person has the right to have their presumption of innocence and reputation respected and, therefore, may not be sanctioned or penalized until the investigation has been concluded. However, if during the investigation it is found that the reported person continues to commit violations, precautionary measures may be adopted, in accordance with the applicable regulations and the provisions of the Compliance Manual.
3. **Right to testify, present evidence, and receive assistance:** The reported person has the right to testify during the investigation or to exercise their right not to testify against themselves or to confess guilt. They also have the right to present any evidence they deem relevant for their defense (witnesses, documents, etc.). In all cases, the reported person must be given the opportunity to testify and provide evidence before the investigation is concluded. In accordance with applicable law, they may be accompanied by a workers' representative or a lawyer, provided they request it in advance and the representative is not involved in the investigated facts. This circumstance will be recorded in the statement.
4. **: Information:** The reported person has the right to be informed of the existence of a report filed against them, as well as to be informed of the outcome of the investigation, that is, whether the report has been substantiated or unsubstantiated. They also have the right to be informed of any corrective measures that may be applied, where appropriate. The reporting person shall not be provided with any information that applicable law expressly prohibits from being disclosed, such as the identity of the Reporting Person.

The reported individual shall be informed of the existence of a report against them as soon as possible, provided that doing so does not compromise the investigation. If immediate notification could jeopardize the process, they shall be informed of the report prior to being summoned to give their statement.

If the report proves to be inaccurate or untrue, or does not constitute any wrongdoing, the reported individual has the right for this to be formally recorded.

5. **Right to a fair procedure:** The reported person has the right to a process with full guarantees, respecting the legal provisions and internal regulations applicable to the procedure. This includes, in addition to the rights already described, compliance with established deadlines (without undue delays), objective and impartial decision-makers (absence of conflicts of interest), and the adoption of measures proportionate to the seriousness of the facts (proportionality of the sanction or penalty).

The Ethics Line complies with current personal data protection regulations, particularly the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation), Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights, and Title VI and other data protection provisions of Law 2/2023 of 20 February, regulating the protection of persons who report regulatory violations and the fight against corruption. The following issues are highlighted:

- i. Access to the data contained in the Ethics Line is strictly limited to the Ethics and Compliance Committee and those internal or external persons who assist in managing and processing received communications.
- ii. Regarding the retention of personal data in the Ethics Line, data must be kept only for the time strictly necessary to decide whether to initiate an investigation into the reported facts. In any case, after 3 months from the data entry, it must be deleted from the Ethics Line, unless the purpose of retention is to demonstrate the operation of the Internal Information System. If communication is not pursued, only anonymized information should be retained. It is also possible to continue processing personal data for the investigation outside the Ethics Line.
- iii. If it is proven that the information provided, or part of it, is not truthful, it must be immediately deleted from the moment this is known, unless the falsehood may constitute a criminal offense, in which case the information must be retained for the necessary time during the judicial process.
- iv. Communications that are not relevant or that, after investigation, are found to be inaccurate, untrue, or not constituting any offense must be immediately archived, without prejudice to storing the data in the appropriate repository.
- v. Personal data that is not clearly relevant must not be collected, and if collected accidentally, must be deleted without undue delay.
- vi. The reported person, the Whistleblower, and any third parties involved must be informed about the processing of their personal data within a reasonable period, and in any case, within one month of receipt, unless doing so compromises the investigation. In that case, they will be informed later, but always before the investigation concludes.

Any data subject may exercise their rights of access, rectification, deletion, objection, restriction, or portability. However, if the reported person exercises the right to object, it will be presumed – unless proven otherwise – that there are compelling legitimate grounds justifying the processing of their personal data.

9. Promotion of the use of the Ethics Line

In accordance with the provisions of the Compliance Policy, Molins periodically conducts awareness campaigns on the use of the Ethics Line for all Collaborators. In addition, it provides clear and easily accessible information about how the Ethics Line functions, as well as the essential principles of the management procedure.

If no communication is received through the Ethics Line for a period of 6 months, its existence, proper functioning, and awareness among employees shall be verified. If any issue is detected, it will be immediately resolved.

10. Procedure for managing communications and reports

The procedure for managing received communications and reports is defined in the Compliance Manual and in Molins' Internal Investigations Protocol. This procedure is applied by the Ethics and Compliance Committee and, in particular, by the Compliance Officer and the individuals from the Compliance department authorized by the latter to access it. The Compliance Officer is individually responsible for the Ethics Channel and, therefore, upon receiving a communication of a potential breach, must lead the corresponding investigation, for which they will be supported by the Ethics and Compliance Committee and the entire organization, in accordance with the provisions set out in the Internal Investigations Protocol.

11. Disciplinary regime

Failure to comply with the law, the Code of Ethics, or internal regulations constitutes a violation, the severity and sanction of which will be determined in accordance with current legislation. The disciplinary procedure begins as a result of an investigation by the Ethics and Compliance Committee and will be carried out in accordance with the provisions of the Internal Investigation Protocol.

If it is confirmed that the offending conduct may constitute a criminal offense, Molins may notify the competent authorities for their knowledge and prosecution.

12. Approval, entry into force and revision

This Policy has been approved by the Board of Directors of Cementos Molins, S.A. and came into force on June 13, 2023.

The Ethics and Compliance Committee is responsible for ensuring the correct implementation and adequacy of this Policy and will therefore inform the Collaborators of the principles of action and periodically review its content. The revisions will be subject to approval by the Board of Directors, after validation by the Audit and Compliance Commission, with immediate effect upon publication.

12.1 Revision record

Internal reference	Version	Date of update	Object of the revision
P.08.2025	2	29.01. 2025	Updating and standardization of the policies of the Corporate Governance System.
P.08.2025	3	25.03.2026	Update of the Policy in accordance with Recommendation 1/2026 of the Independent Authority for the Protection of Whistleblowers