



CORRUPTION PREVENTION POLICY

1.

(Scope)

1. Secil, Companhia Geral de Cal e Cimento S.A. (hereinafter, "Secil" or "Company") acknowledges that combating and preventing corruption as provided for herein is a guiding principle of its activities and is part of its commitment to sustainable development.
2. This policy is a benchmark for and governs the activities of Secil and of the companies which are in a control or group relationship with the Company (hereafter "Secil Group"), regardless of the location of their head offices and activities, concerning the combat and prevention of corruption. These companies shall adopt principles and commitments equivalent to those set out in this policy, taking into account the context and specific features of their respective activities and in compliance with the applicable legislation.
3. The principles and rules set out in this policy shall apply to all members of Secil governing bodies, members of the committees, representatives, service providers and staff, hereinafter jointly referred to as Staffers, who undertake to comply with them.

2.

(Framework)

Secil commitment to combat and prevent corruption is based on the assumption of compliance with the laws and regulations that apply to activities in the respective jurisdictions and are established in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, namely the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the eight core ILO Conventions and the International Bill of Human Rights.

3.

(Commitments)

Under the terms and for the purposes set forth in this policy and without prejudice to compliance with applicable laws and regulations on this matter, Secil makes the following commitments regarding the combat and prevention of corruption:

- a) Secil and its Staffers undertake not to offer, promise or authorise undue advantage to a person or entity in order to obtain material or non-material advantages for themselves or for third parties;
- b) Secil and its Staffers undertake not to seek an advantage when acceptance thereof might impair their current or future independence and impartiality in relation to the offeror or related entities;
- c) Secil and its Staffers undertake not to use donations or grants to exercise illicit influence in order to obtain decisions in their favour;
- d) Secil undertakes not to make contributions to political parties, and



- e) Secil undertakes to encourage the reporting of operations suspected of breaching this policy through the usual reporting procedures or, alternatively, through the Secil Group Integrity Channel.

4.

(Dissemination, implementation and monitoring)

1. Secil shall promote the dissemination of this policy across the Company and the Secil Group and to current employees or those who may work for Secil in the future, thereby imbuing its corporate culture with this policy, namely by holding training sessions and incorporating its principles and commitments in operational procedures.
2. The Board of Directors will approve the necessary acts for the adoption of this policy, namely by establishing preventive and corrective measures and compliance evaluation procedures - *aimed at identifying the main impacts and potential risks of its activity in this regard* - and take the necessary actions and ensure the disclosure of relevant information on combating corruption in a transparent manner in its annual report.
3. Secil Executive Committee shall implement specific measures to promote and comply with this policy including the implementation of any necessary mitigation and corrective measures or remedies.
4. Secil Staffers are responsible for reporting acts of non-compliance with the principles and commitments set out in this policy and for detecting any nonconformities through the usual reporting procedures or, alternatively, through the Secil Group Integrity Channel.

5.

(Adoption and entry into force)

This policy was adopted by the Board of Directors on 23 November 2023. The policy shall take effect on the date of adoption.

The Board of Directors