



FAIR COMPETITION POLICY

1.

(Scope)

1. Secil - Companhia Geral de Cal e Cimento, S.A. (hereinafter, "Secil" or "Company") acknowledges that the respect for competition legislation 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 business ethics and compliance with competition legislation. 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.

2.

(Framework)

The commitments made by Secil herein, to respect and observe sound competition practices were established in accordance with current competition legislation, 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 out in this policy, Secil undertakes the following commitments in the context of fair competition:

- a) Implement good competition practices and comply with applicable competition legislation and regulations within the scope of the development of its activity, particularly with its workers, collaborators, partners, suppliers, customers, other counterparties and local communities;
- b) Prevent all forms of anti-competitive practices, namely price determination, the presentation of false proposals (fraudulent competition), the creation of artificial restrictions on production or sales and the conclusion of agreements to fix prices, sales conditions or divide markets;
- c) Cooperate with official, supervisory and regulatory entities in competition matters, namely with the Competition Authority (*Autoridade da Concorrência*) and Sector Regulation Authorities, as well as with their respective agents, providing all legally required information;
- d) Promote the training of its employees in good practices in competition matters and promote awareness of the importance of complying with all applicable competition rules, especially those whose functions require it, and
- e) Encourage the reporting of operations suspected of violating competition standards and good practices



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.
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,