

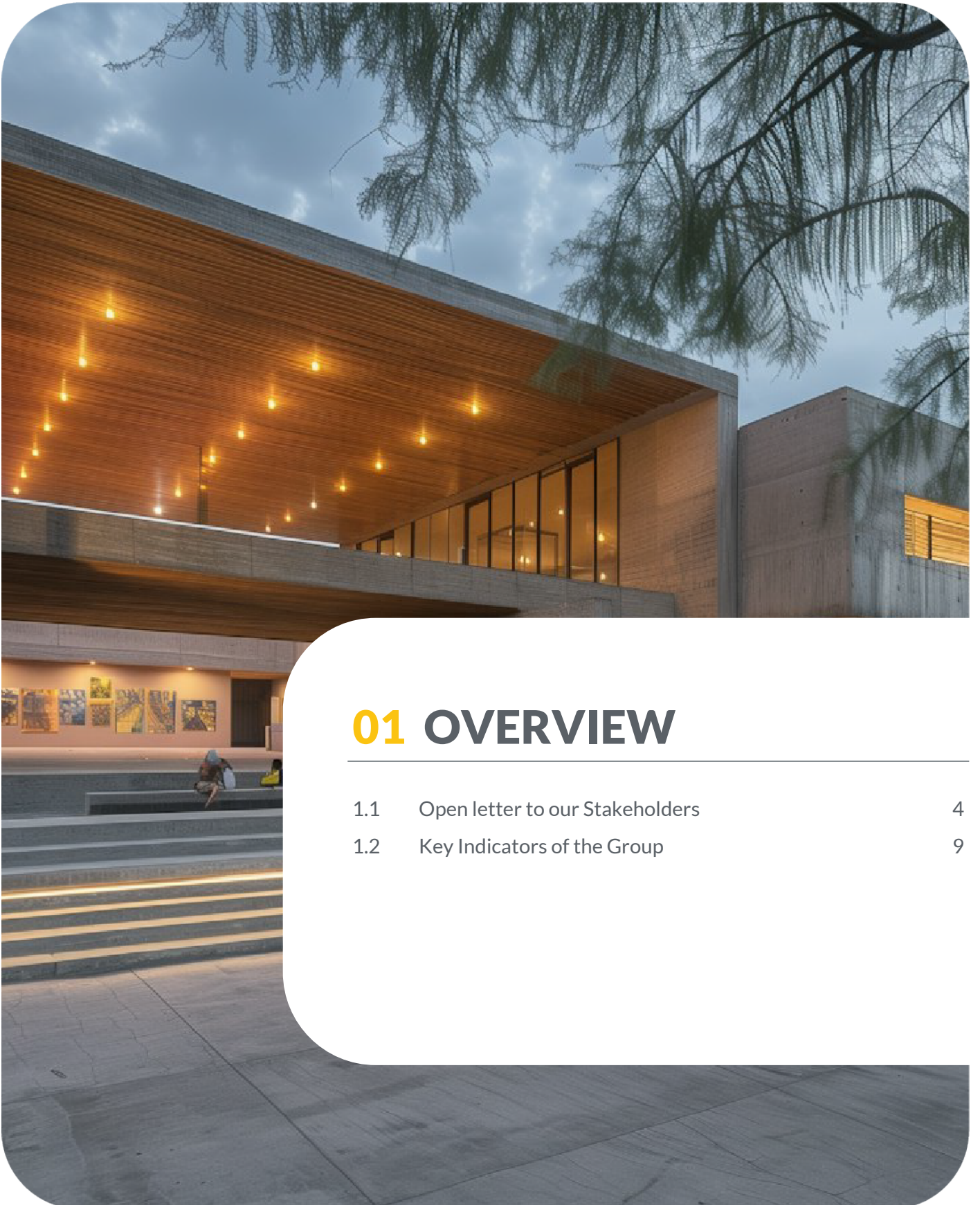


# BUILDING FUTURE

SUSTAINABILITY  
INFORMATION  
**2025**

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# 01 OVERVIEW

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**Ricardo Pires**  
Chairperson of the Board  
of Directors

**Otmar Hübscher**  
Chief Executive Officer

## 1.1 Open letter to our Stakeholders

“

The 2025 year marks the conclusion of Secil's strategic cycle defined in 2021 under the Ambition 2025 programme, which can be considered to have achieved its core objectives.

### Renewing the Cycle

The 2025 year marks the conclusion of Secil's strategic cycle defined in 2021 under the Ambition 2025 programme, which can be considered to have achieved its core objectives.

Revenue reached €751.3 million (7.1% higher than in 2024) and EBITDA totalled €203.2 million (25.7% above 2024 levels), representing the most visible outcomes of our commitment to commercial and operational excellence, innovation, and sustainability. These results reflect the successful delivery of numerous transformational projects, a strong customer focus, the increasing digitalisation of processes, and our continued investment in people as an indispensable source of differentiation and competitiveness.

These transformational projects do not always generate immediate returns; however, they consistently provide the strongest foundations for advancing towards operational excellence, enhancing productivity, and reinforcing a sustainable and low-carbon approach across our operations.

We made significant investments to reduce our carbon footprint through the planning and implementation of major industrial decarbonisation projects, while also accelerating our digital transformation and strengthening the skills and capabilities of our workforce.



Despite an international economic environment characterised by heightened risks and increasing uncertainty, affecting global trade and constraining investment decisions, we achieved a significant improvement in results across most of the markets in which we operate. Notable contributions came from Portugal and Brazil, where we completed major industrial investments and launched several new initiatives. In Lebanon, we completed the construction of a 10 MW solar power plant, enabling us to reduce CO<sub>2</sub> emissions while enhancing our competitiveness through lower operating costs.

In Portugal, we took decisive steps towards the implementation of the ProFuture project, an investment that will substantially reduce carbon emissions and improve the energy efficiency of the Maceira-Liz plant. At the same time, we continued to advance digital transformation and innovation initiatives across several business areas.

We therefore consider not only the 2025 year, but also the entire Ambition 2025 cycle, to have been highly successful. This achievement was only possible thanks to the commitment, motivation, and alignment of all stakeholders. Employees, customers, suppliers, and shareholders have all contributed to making Secil a more sustainable and resilient organisation, better equipped to address the significant challenges and opportunities of the new and ambitious strategic cycle that will commence in 2026.

**To all, thank you**

## 1.2 Key indicators

EBITDA



**€203.2m**

2024: €161.6m



**+25.7%**

Revenue

**€751.3m**

2024: €701.8m



**+7.1%**



CO2 Emissions (scope 1)  
kg CO2 per t cement

**-8.7%**

vs. 1990 emissions



-0.4% vs 2024 emissions

CEMENT  
PRODUCTION  
CAPACITY

**8**  
plants

**10.28Mt**



Alternative  
fuels

**26%**

2024: 25%



**+**

Quarries with implemented  
rehabilitation plans

**100%**

2024: 90%



**+**

Sustainable Financing

**74%**

2024: 57%



**+**

No. of employees



**2 890<sup>1</sup>**

2024: 2 573<sup>1</sup>



**+317**

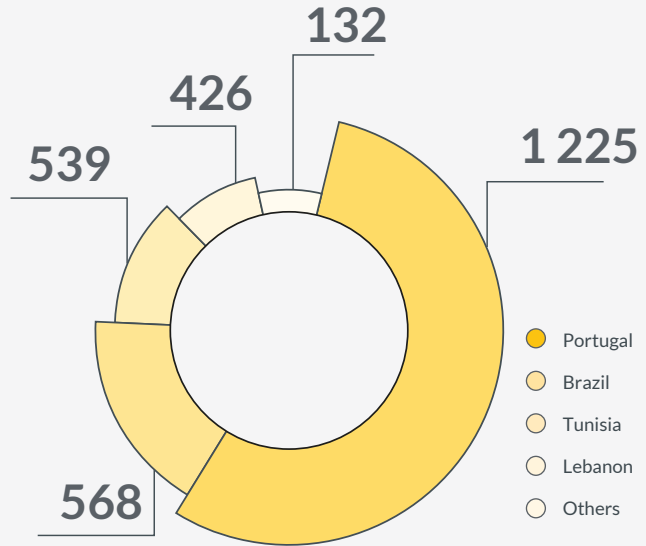
<sup>1</sup>Include governance bodies



Female employees

**13.5%**

2 890 employees, distributed by:



Accident Frequency Rate  
(direct and indirect employees)

**6.30**

2024: 6.84

**0**

Fatalities

**0**

Complaints related to Human Rights



## **02** SECIL GROUP PROFILE

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## 2. Secil Group Profile

### 2.1. Who we are

Secil is a business group founded in Portugal, dedicated to the production and sale of cement, concrete, aggregates, mortars and hydraulic lime. Featuring a history that dates back almost 100 years, we have always promoted quality construction, based on solidity, safety and comfort.

Secil's identity is based on its Mission, Vision and Values, as well as our Code of Conduct, which guides our actions. These principles not only differentiate the company but are also the foundation of its organisational culture. They are the key pillars that guide the Group as a whole, underlying every action and strategic decision.

For this reason, the process of defining these principles was decisive, resulting from close collaboration and involving all the locations where Secil operates. Working groups in each country were created to ensure integration and alignment with local strategic ambitions.

Secil's story began with the opening of its first plant in Portugal, in Outão (Setúbal), in 1904. Since then, the company has taken part in the cement industry's development, and its sustainable expansion over almost a century led to operations on four continents. In 1930, resulting from the merger of two companies, Secil – Companhia Geral de Cal e Cimento was established, driving profound changes and significant technological developments ever since.

**Along with the technological transformations, Secil's history also reflects a growing environmental awareness. Among various growth milestones, we note the acquisition in 1994 by Semapa of 51% of Secil and 100% of CMP – Cimentos Maceira e Pataias.**

Semapa, which has owned the entire share capital of Secil since 2011, is a holding company listed on Euronext Lisbon (part of the PSI index) and whose majority shareholder is the Queiroz Pereira family. Featuring a solid tradition in Portuguese industry and finance, Semapa is a strategic pillar in Secil's consolidation and sustained growth.

Secil reiterates its commitment to being a responsible and innovative company, focused on creating value and satisfying the needs of our customers and partners. Secil strives to offer outstanding construction solutions and provide development opportunities for its people, fostering good citizenship in the companies' communities, while generating sustainable value for the shareholders.



## 2.2. What we do

Boasting almost 100 years of experience, during this time Secil has developed its activities in the production and sale of cement and construction materials, gaining international recognition as a leading operator.

Although cement remains our core business, expansion into complementary sectors and the integration of companies with different expertise has substantially strengthened its market position. In addition to cement, Secil currently also produces and markets concrete, aggregates, mortars and hydraulic lime.

Furthermore, the Secil Group includes a company that operates in the circular economy, reusing waste as an alternative energy source, in line with our sustainability and environmental efficiency principles.

In order to guarantee the high-quality standard of our final products, Secil complements its offer with a range of differentiating services that support the best selection, application and maintenance of its products. This integrated approach enables Secil to provide an effective response to each customer's specific challenges, ensuring technical solutions that meet their needs.

### 2.2.1. Innovation and Development Center / Laboratories (CIND)

The Innovation and Development Center (CIND) provides highly specialized, high-quality technical services aimed at supporting customers in the use and application of Secil Group products. Focused on solving technical challenges and creating innovative solutions, CIND contributes to enhancing the potential of Secil's products across the various markets in which the Group operates.

At the same time, CIND plays a strategic role in the development of solutions addressing current construction and decarbonization challenges. One example is the LowCBionic project, which aims to create organically shaped structures using low-carbon concrete produced through 3D printing technologies. This challenge involves the development of an advanced cement-based material suitable for use in three-dimensional printing equipment.

## 2.2.2. Technical Support and Laboratory Services

Through its Quality and Environmental Laboratories, Secil diagnoses specific issues, conducts critical analyses and performs the necessary trials to find the right solutions. In addition to certification and technical support, Secil has a prescription team that collaborates with architects and construction owners to suggest the best technical solutions for their projects.

## 2.2.3. Logistics Service

Secil features a comprehensive logistics network that includes land and maritime transport, ensuring efficient product delivery directly from the production plants or warehouses to the customers or their construction sites.

## 2.2.4. Customer Support

Secil's Documentation Centre provides a wide range of technical resources — such as data sheets, manuals, application diagrams and other documents — to support our customers in their daily construction challenges. Additionally, dedicated helplines to clarify doubts and personalised assistance are available.

## 2.2.5. Waste Treatment and Environmental Commitment

Through AVE – a company in the Secil Group that specialises in waste use solutions –, Secil features advanced and environmentally sustainable technologies for waste co-processing. This approach reinforces the Group's commitment to sustainability and increasingly eco-conscious practices.

## 2.3. Where we operate

The Secil Group operates in eight countries on four continents, with 2 890 employees and an annual cement production capacity of over 5 million tons, across seven plants. The Group currently has operations in Portugal, Angola, Tunisia, Lebanon, Cape Verde, Spain, the Netherlands and Brazil.

**Secil is a major player in the cement industry, developing several operations in various countries around the world.**





## 2.4. Mission, Vision and Values



### Mission

Shaping ideas by providing cement solutions to our customers, stimulating careers for our people, upholding civic responsibility in our communities and delivering value to our shareholders.



### Vision

In the communities where we serve, we strive to be our customers' preferred cement solutions provider.



### Values

#### PEOPLE

We value other people's perspectives.  
 We help people do their best.  
 We show empathy and listen before offering guidance.  
 We work tirelessly to guarantee everyone's safety.

#### INTEGRITY

We show respect, valuing all individuals and all ideas.  
 We are honest and trustworthy in our relationships with other people.  
 We uphold the highest ethical and safety standards.  
 We recognise our colleagues' best characteristics, and act accordingly.

#### RESPONSIBILITY

We are accountable for our actions and results.  
 We focus on finding solutions and achieving results.  
 We apply sustainable practices in our business.  
 We are committed to building a healthy and safe work environment.

#### PERFORMANCE

We are results-oriented and deliver on our promises.  
 Our goal is to continuously improve ourselves and our processes.  
 We learn from mistakes and successes in equal measure.  
 We encourage sincerity as a way to improve decision making.

#### COLLABORATION

Together, we are stronger and can deliver more.  
 We believe that shared goals and mutual support lead to success.  
 We celebrate our achievements collectively.  
 We promote trust and thoughtfulness, as these enhance collaboration.



## 2.5. Secil Strategic Cycle “Ambition” – Conclusion and Impacts in 2025

In 2025, Secil successfully concluded the “Ambition 2025” strategic cycle, consolidating a path of sustained transformation, supported by the rigorous execution of the priority initiatives defined over recent years. This year marked the full maturity of several structuring projects, enabling the achievement of tangible impacts in terms of financial and operational performance, as well as the strengthening of Secil’s competitive position.

This cycle was also marked by the implementation of highly relevant industrial investments across different Group geographies.

Particular emphasis should be given to the largest project of the cycle, the **Clean Cement Line (CCL) at Outão**, in **Portugal**, which reached full operation in 2025. Similarly, the **Adrianópolis Kiln Revamping Project** in **Brazil**, executed in 2024, operated at cruising speed throughout 2025, reinforcing industrial capacity and efficiency.

Among other strategic projects, the following should also be highlighted:



- The **Retrofit** and Capacity Increase of the Bag Plant at Maceira (Portugal);
- The installation of the first **10MW of Solar Energy** in Siblinge (**Lebanon**), contributing to greater energy supply stability and the sustainability of operations;
- The installation of a New **Big Bag Machine** at SCG (**Tunisia**), increasing logistical flexibility and strengthening export capacity.

From a financial perspective, Secil achieved a consolidated EBITDA of EUR 203 million in 2025, surpassing the target of exceeding EUR 200 million and generating significant value for shareholders. This performance resulted from a set of more than 100 initiatives structured across the Group’s main strategic dimensions:

**Customers:** Secil consolidated its position as a benchmark supplier, with a more integrated value proposition focused on higher value-added solutions, while simultaneously strengthening customer proximity. This approach was reflected in the positive evolution of the NPS across all markets in which the Group operates.

**Sustainability and ESG:** Ambition 2025 integrated sustainability as a strategic pillar, with significant progress in ESG governance, monitoring and reporting. Quarterly monitoring of more than 20 topics grouped under the Environmental, Social, Governance and Economic pillars was ensured, supported by dedicated dashboards, reinforcing transparency and data-driven management. Secil formalised its commitment to the SBTi initiative and has continuously improved its ESG score.

**Innovation:** Industrial modernisation remained central, with particular emphasis on the completion of the Outão CCL project, the progress of the ProFuture – CCL Maceira project, and the development of alternative fuel solutions, low-carbon cements and emerging technologies.

**Operational Performance:** Operational excellence was strengthened through benchmarking initiatives, energy optimisation, process digitalisation and the transformation of the procurement model. The latter now benefits from more robust governance and full digitalisation, with a direct impact on value creation and EBITDA improvement.

**Scale and Diversification:** The portfolio diversification strategy materialised through investments in areas adjacent to cement, such as modular construction (through the joint venture with Grupo Casais since 2023) and, in 2025, through the acquisition of Argatecnic, strengthening Secil’s presence in the mortars segment.

With the conclusion of the “Ambition 2025” cycle, Secil Group closes a phase marked by sustained growth, industrial transformation and strengthened competitiveness, positioning itself solidly to embark on a new strategic chapter focused on innovation, decarbonisation and sustainable growth.



## 03 SUSTAINABILITY INFORMATION

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## 3. Sustainability information

### 3.1. Non-financial Information Statement

#### 3.1.1. General Information

##### 3.1.1.1. Basis of Preparation of the Statement

###### Preliminary Note

The Corporate Sustainability Reporting Directive (CSRD)<sup>1</sup> requires the disclosure of sustainability information in accordance with the European Sustainability Reporting Standards, with reference to the financial year starting on 1 January 2025.

The CSRD established that Member States should transpose it by 6 July 2024, becoming applicable to the companies within its scope under the terms resulting from its transposition into the respective national legal systems.

The process of transposing this Directive into the national legal framework had not been completed by that date, nor by the end of 2025 and, to the best of Secil's knowledge, it remains under review by the competent authorities. Consequently, it had not entered into force by the date of approval of the financial information (11 February 2026).

The same applies to the Omnibus I reform, approved by the European Parliament on 16 December 2025, which amended the CSRD and will only produce effects following its publication in the Official Journal of the European Union and subsequent entry into force. Companies subject to the application of the CSRD are already currently covered by the Non-Financial Reporting Directive (NFRD), with the CSRD representing a very significant evolution in sustainability reporting, requiring compliance with the more demanding criteria set out in the European Sustainability Reporting Standards (ESRS).

Although exempt from the obligation to prepare a sustainability report in accordance with the ESRS, Secil voluntarily complied with the framework established under the CSRD, also taking into consideration the absence of transposition within the deadlines and period described above.

###### BP-1 – General Basis for the Preparation of the Sustainability Statements

Although there is no legal obligation for Secil Group<sup>2</sup>, to publish this sustainability document, since it is majority-owned by a holding company – Grupo Semapa – which already publishes a consolidated sustainability report, Secil Group is exempt from this obligation. However, it has chosen [ESRS 2.5b-2] to publish its own document, in line with its commitment to transparency.

<sup>1</sup> () Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting.  
<sup>2</sup>Pursuant to Article 19a, nr. 9, or Article 29a, nr. 8, of Directive 2013/34/UE.



## Scope of consolidation

The scope of consolidation of this non-financial information statement was the same as that of the financial statements, considering all companies and geographies of Secil Group. Whenever this was not possible, a note to that effect is included in the relevant context. It covers information and data aligned with the 2025 calendar year, covering the period from 1 January to 31 December. For disclosures relating to Scope 1 and Scope 2 GHG emissions, the operational control approach was considered in determining the consolidation scope. [ESRS 2.5a | ESRS 2.5b1 | ESRS 2.5b2]

The Group did not omit any specific information relating to intellectual property, know-how, innovation results, imminent developments or matters under negotiation in its non-financial information statement, nor did it omit any other information in a permitted manner<sup>3</sup>. [ESRS 2.5d; ESRS 2.5e; ESRS 2.41]

## Value chain

Following the double materiality principle, relevant information regarding the upstream and downstream value chain was included, whenever necessary, to understand Secil Group's material impacts, risks and opportunities and to provide information that meets the qualitative characteristics defined in the Corporate Sustainability Reporting Directive (CSRD). [ESRS 2.5c]

## BP-2 – Disclosures in Relation to Specific Circumstances

### Time horizons

Secil Group maintained alignment with the time horizons defined in ESRS 1, namely considering short term as up to one year, medium term as between one and five years, and long term as more than five years. [ESRS 2.9a]

### Value chain, sources of estimates and outcome uncertainty

The report presents data relating to Scope 3 emissions (E1-6), using specific emission factors (EFs) taking into account Secil's activity data. The percentage of Scope 3 emissions calculated based on primary data was 76%, with the remainder estimated based on the best available information. Although these calculations are based on emission factors from credible databases, they may still be subject to uncertainty. [ESRS 2.10b] Although no high levels of uncertainty related to measurements were identified [ESRS 2.11a | ESRS 2.11b | ESRS 2.11c], Secil considers that the cross-cutting digitalisation project currently underway to automate data collection will improve the accuracy of data collection. [ESRS 2.10d]

At Secil, estimates were used for disclosures relating to certain facilities concerning: electricity consumption for the month of December 2025 at some facilities (E1-5); water withdrawal (E3-4); and waste generation (E5-5).

The Scope 1 and Scope 2 emissions values of the cement plants are annually assured through external verification within the scope of the GCCA – Global Cement and Concrete Association and the EU ETS (European Union Emissions Trading System). In the remaining cases, unless otherwise stated, the metrics disclosed in the Non-financial Information Statement were not validated by an external entity other than the auditor of the annual report. [ESRS 2.11]

Information relating to data uncertainty and estimates is presented in context within the respective sections. [ESRS 2.10 | ESRS 2.11]

<sup>3</sup>Exemption from the disclosure of the information referred to in Article 19a(3) and Article 29a(3) of Directive 2013/34/UE.

## Comparative information and changes in the preparation or presentation of sustainability Information

Comparative information is presented in this sustainability report whenever applicable. Historical data relating to the reporting period in accordance with the ESRS Standards – 2024 – is presented, as these introduced differences in the calculation of certain metrics compared with Secil's previous reporting practices, which were based on the Global Reporting Initiative (GRI) Standards.

Regarding changes in the preparation and presentation of sustainability information compared with the previous reporting period, where applicable, these are identified together with the respective information. It should be noted that, for environmental indicators, as in previous years, Scope 1 emissions were revised to incorporate changes resulting from EU ETS verification and information that was not available at the time of publication of the previous report. [ESRS 2.13a] However, whenever corrections relating to the previous year's reporting are made, a note is included alongside the respective metric. [ESRS 2.13b | ESRS 2.13c]

An adjustment was also made to the target and metric defined to monitor affected communities, in order to better align them with internal objectives, the details of which are provided alongside the respective target and metric. [ESRS 2.10 | ESRS 2.13b | ESRS 2.13c]

## Correction of errors relating to previous periods

No material errors relating to the previous period were identified. [ESRS 2.14a | ESRS 2.14b | ESRS 2.14c]

## Disclosures arising from local legislation or generally accepted pronouncements on sustainability reporting

The non-financial information statement aims to consolidate and reflect Secil Group's approach and commitment to sustainability matters. It was prepared based on the Non-financial Reporting Directive, transposed into national law through Decree-Law No. 89/2017 of 28 July, and in accordance with the European Sustainability Reporting Standards (ESRS). [ESRS 2.15]

As required by the ESRS, it also includes disclosures under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation, of 18 June) – presented in Chapter 3.1.2.1. – and a list of datapoints derived from other EU legislation from which datapoints included in the cross-cutting and topical standards arise, in accordance with Appendix B of ESRS 2.

Secil also reports with reference to the GRI – Global Reporting Initiative Standards (Chapter 3.2.1). Secil further reports GCCA – Global Cement and Concrete Association indicators (Chapter 3.2.2.) and indicators in accordance with the sustainable finance framework (Chapter 3.2.3). [ESRS 2.15]

## Insertion by reference

Secil adopted the "Insertion by reference" approach to improve the narrative structure of the report and included certain disclosure requirements throughout the annual report and within the non-financial information statement itself. The list of disclosure requirements incorporated by reference and their location in this report can be found in Chapter 3.1.5.1.3. [ESRS 2.16]

### 3.1.1.2. Sustainability governance

#### GOV-1 – The role of the administrative, management and supervisory bodies

##### Roles and responsibilities of the administrative, management and supervisory bodies

Secil believes that, in order to address environmental, social and economic risks and opportunities, it requires a structured governance model.

The first step was taken in 2021, with the creation of the ESG+E (Environmental, Social, Governance + Economic) project, within the scope of defining Ambition 2025 (Chapter 2.5).

In 2021 and 2022, the working teams, priorities and targets for the various topics within the framework were identified. This process resulted in several specific roadmaps which, together, guide Secil's sustainability journey. These include:

- Decarbonisation;
- Stakeholder engagement;
- Health and safety;
- Diversity;
- Sustainable finance;
- Human rights.

Secil is therefore aligned with governance best practices regarding its structure, maintaining a Board of Directors (BoD), which has delegated day-to-day management to an Executive Committee (EC). [G1.GOV-1\_01 | G1-5a] The Board of Directors is responsible for managing the Company's activities and for decision-making on any matters relating to the management of the Company, or other matters not falling within the exclusive competence of the General Shareholders' Meeting.

The Sustainability Committee, which has existed since 2016, was expanded in 2023 to include all corporate departments and all individuals involved in the four pillars: Environmental, Social, Governance and Economic. It started meeting on a quarterly basis, with the main purpose of disclosing sustainability performance, across its various topics, to the entire organisation, as well as monitoring the status of the various projects contributing to the Global Sustainability Roadmap.

## Sustainability Governance



The supervision of the Company is entrusted to a Supervisory Board. In 2025, the Supervisory Board consisted of three effective members and one alternate member. [ESRS 2.22a]

Secil has the following internal structures responsible for impacts, risks and opportunities, which are reflected in different ways in the Group's terms of reference, the mandates of the Board of Directors and other related policies. [ESRS 2.22a | ESRS 2.22b]

- The **Sustainability Committee**, created in 2016 and expanded in 2023 to include all corporate departments and individuals involved in the four sustainability pillars – Environmental, Social, Governance and Economic – meets quarterly. Its purpose is to communicate sustainability performance across its various topics to the entire organisation, as well as to monitor the status of the various projects contributing to the Global Sustainability Roadmap. It includes managers and technical specialists in these topics and is responsible for monitoring progress, overseeing strategic projects and ensuring compliance with the defined targets.



- **Secil's Sustainability area** was created in 2023 (organisation chart of the Sustainability area below), with the purpose of coordinating all corporate activities and those of the geographies in which it operates relating to the topics of its sustainability framework. It has a decentralised and collaborative model, since sustainability topics are distributed across the different departments and integrated into their respective functions. The coordination of activities related to ESG+E topics is carried out by the Group Sustainability area, which coordinates the corporate activities and those of the geographies in which it operates relating to the topics of its sustainability framework (Chapter 3.1.1.3), covering, among other aspects, the development of policies, performance monitoring and the identification of risks and opportunities. The framework describes, by ESG+E pillar (E – Environmental, S – Social, G – Governance, E – Economic), the sustainability topics addressed within Secil Group.

**Its main responsibilities include:**

- Developing and implementing the sustainability strategy;
- Monitoring and reporting sustainability performance;
- Managing sustainability-related risks and opportunities;
- Engaging with internal and external stakeholders.

**Sustainability area diagram**





## Within the Secil Group, Management plays an essential role in the governance, oversight, and monitoring of the management and supervision processes related to these material IROs.

At Secil, the responsibility for managing, monitoring and overseeing sustainability topics is shared between the Sustainability Committee, the Sustainability area and the ESG+E pillar leads. The global leads for each pillar define objectives for each topic, while the **local leads for each pillar** in each geography where Secil operates are responsible for implementing the global strategies adapted to local realities. The monitoring of the specific actions within the roadmaps of the topics included in the sustainability framework is ensured through the **ESG+E pillar meetings**. In addition, there are **policies** that define principles for all employees (corporate-level), as well as **procedures**. Secil also follows **sector-specific roadmaps** on topics such as decarbonisation, health and safety, sustainable finance and human rights. [ESRS 2.22c | ESRS 2.22c-1]

Each management and supervisory body considers the topics within the framework under its direct responsibility when overseeing Secil's strategy, making decisions and managing associated risks. This approach ensures that each area of the organisation efficiently integrates sustainability topics into its operations, while the Sustainability area coordinates all activities to ensure strategic alignment across all geographies where Secil operates. [ESRS 2.22b | ESRS 2.22c-1]

Within the scope of governance practices (Chapter 3.1.4.1), which are guided by policies such as the Code of Conduct, adherence to ethical and sustainable standards is established as a fundamental pillar across all levels of the organisation, which is essential for the formalisation of responsibilities relating to the IROs.

Within Secil Group, Management plays an essential role in the governance, control and monitoring of the management and oversight processes relating to these material IROs, with this work being carried out in a structured and collaborative manner.

Specific controls and procedures are applied for the management of sustainability topics (specific roadmaps), integrated into internal functions, ensuring a coordinated and effective approach, of which the following are particularly relevant: [ESRS 2.22c-3]

- Environmental topics monitored and tracked through monthly dashboards;
- Deviations from policies and/or the Code of Conduct, through the Integrity Channel, within the company's legal and compliance function;
- Supplier management, which has specific controls and procedures within the Procurement area;
- In the health and safety area, there are numerous specific procedures in place to manage impacts and risks.

Additionally, the targets and KPIs defined within the Sustainability framework are monitored by the administrative (Executive Committee), management and supervisory bodies, as well as senior executives, at all Sustainability Committee meetings, which take place four times a year.

The Risk Management area is also responsible for identifying, assessing and monitoring the main ESG risks, ensuring their integration into strategy, decision-making and control mechanisms. The alignment between the main identified ESG risks and the risks arising from the materiality assessment constitutes an area under development, currently being strengthened with a view to further enhancement in the upcoming reporting cycles.

It is also expected that Internal Audit will play a relevant role in the independent assessment of the effectiveness of risk management, internal control and governance processes associated with ESG matters, contributing to the strengthening of transparency, credibility and the continuous improvement of the Organisation's sustainable performance. To date, the scope of Internal Audit activities does not yet include a specific focus dedicated to ESG matters, with this framework currently under analysis within the context of the evolution of the governance and internal control system. [ESRS 2.22d]

### Composition and diversity of the members of the administrative, management and supervisory bodies

At the end of 2025, the Board of Directors consisted of eight members: five non-executive directors and three executive directors, including two women. [ESRS 2.22a] The Supervisory Board consisted of three effective members and one alternate member. [ESRS 2.22a]

The representation of employees within the Company's governance bodies is ensured through the participation of the Human Resources Director, Isabel Moisés, who has been a member of the Global Management Team (GMT), the organisation's management structure, since 2023. In 2024, this representation was further strengthened, as she became a member of the Executive Committee, thereby contributing to ensuring that employees' perspectives and interests are considered in decision-making processes. [ESRS 2.21b | 2.21d]

Composition and Diversity   administrative, management and supervisory bodies	2025		2024	
	No. of members	%	No. of members	%
<b>Executive Vs. Non-Executive</b>				
Executive members	4	33 %	3	23 %
Non-Executive members	8	67 %	10	77 %
Independent members	0	– %	–	0 %
<b>Male Vs. Female</b>				
Male	8	67 %	11	85 %
Female	4	33 %	2	15 %
<b>Total</b>	<b>12</b>	<b>100 %</b>	<b>13</b>	<b>100 %</b>
<b>Gender diversity in the Board of Directors (Index)</b>	<b>0.25</b>		<b>0.10</b>	

## Competencies and expertise

The competencies of the members of the governing bodies derive from their academic background, professional experience and training/participation in internal and external capacity-building initiatives undertaken. The tables below indicate the main areas of expertise of the members of the BoD. [ESRS 2.21c | ESRS 2.23a]

### Board of Directors competencies

	<b>Ricardo Pires</b>	<b>Otmar Hübscher</b>	<b>Carlos Correia de Barros</b>	<b>Gian Raffainer</b>	<b>Hugo Pinto</b>
<b>Position / Key skills</b>	Chairperson	Vice-Chairperson/CEO	Executive Board Member/CFO	Executive Board Member/COO	Board Member
Business Leadership	X	X		X	X
Financial and Risk Management	X	X	X	X	
Mergers and Acquisitions	X		X		X
International Expansion	X	X	X	X	
Sales Management					
Strategic Planning	X	X	X	X	X
Talent Management	X	X		X	
Research and Development					
Information Technology			X		
Industrial Experience				X	X
Environment and Sustainability	X	X		X	
Legal	X	X			

Note: It was not possible to collect information relating to the remaining members of the Board of Directors as of the date of this report.



## Secil Academy

**The Secil Academy is a training centre and a strategic lever for Secil's growth, preparing employees for present and future challenges. It arose from the strategic need to equip Secil employees with a common set of competencies aligned with the Group's values. Within this framework, four schools were created within the Secil Academy: the technical school, the management school, the safety school and the leadership school. [ESRS 2.23]**

### Secil Academy

To train and develop the competencies of its People, Secil created the Secil Academy. Secil is developing several training initiatives through the Secil Academy on sustainability topics aimed at the administrative, management and supervisory bodies, as well as other employees, in order to ensure the existence of the specialised knowledge required to oversee sustainability matters. [ESRS 2.23]

Collectively, the bodies, based on the internal training initiatives carried out over the last three years (from 2022 to 2024), acquired competencies in operational safety (health and safety of own workforce and workers in the value chain), sustainability and environmental responsibility, as well as ethics and compliance, which are directly associated with several of the identified IROs (social, environmental and governance-related, respectively) [ESRS 2.23a/b | G1.5b]. Particular emphasis is given in 2025 to the following training initiatives attended by members of the governing bodies:

- Visible Operational Leadership (VOL) – safety culture and behaviour pillar;
- Leader Secil & How to Give Feedback;
- This is Us - Group Policies;
- Communication to Influence;
- Digital Training and Transformation.

Participation in these initiatives has contributed to the development of specialised knowledge among the members of the administrative, management and supervisory bodies with regard to business conduct. The knowledge of the governing bodies on sustainability-related matters is also enhanced through the participation of their members in institutional events involving various Group Stakeholders, such as the Technical Association of the Cement Industry, the Business Council for Sustainable Development, the Global Cement and Concrete Association and Cembureau. [ESRS 2.23a/b]



## GOV-2 – Information provided to and sustainability matters addressed by the company's administrative, management and supervisory bodies

Within the Group, all governing bodies are duly informed, on a quarterly basis, about the performance of sustainability topics, including the implementation of due diligence, as well as the outcomes and effectiveness of the policies, actions, metrics and targets adopted to address them. [ESRS 2.26a] As sustainability is one of the fundamental pillars of the Ambition 2025 strategic cycle (Chapter 2.5), the sustainability framework is the instrument that organises and guides the different related themes and topics. [ESRS 2.26b]

The double materiality assessment, the results of which were approved by the Executive Committee in January 2025, is being progressively incorporated into Secil's sustainability framework (section 3.1.1.3 Strategy), with the necessary level of granularity, since the outcome of the process did not fully coincide with the topics previously defined within the framework, although it corresponded to most of them. These topics are being incorporated by the areas responsible for the various matters, and the management, administrative and supervisory bodies are informed by the Sustainability area, together with the leads of each pillar (ESG+E), within the Sustainability Committees, where these topics are addressed, or through other more specific thematic forums. The full detail of the material IROs identified through the double materiality assessment process is presented in context in the chapters corresponding to the various topics, with those covered by the framework presented in the respective chapter (Chapter 3.1.1.3). [ESRS 2.26a | ESRS 2.26b]

Among the sustainability topics/IROs reviewed by the administrative, management and supervisory bodies, or by the competent committees, during the reporting period, the following can be identified [ESRS 2.26c]:

- The impact of the new Directive and the European Sustainability Reporting Standards;
- Development of a new double materiality assessment for all Group companies;
- The IROs identified within the scope of the double materiality exercise conducted in 2024 and prepared in accordance with the ESRS were approved by Secil's Executive Committee;
- Approval by the Executive Committee of the IROs identified within the scope of the Double Materiality exercise conducted in 2024 and prepared accordingly;
- The impact of Scope 3 emissions on Secil's total emissions;
- The most relevant decarbonisation projects;
- ESG rating results and key areas for improvement;
- Health and safety matters and own workforce topics;
- The sustainability framework topics (ESG+E), monitored on a quarterly basis.



### GOV-3 – Integration of sustainability performance into incentive schemes

The Group has several KPIs relating to sustainability topics such as health and safety, CO<sub>2</sub> emissions, ESG rating, among others, which are reflected in the performance assessment of the members of Secil's Executive Committee and Board of Directors<sup>4</sup>. These KPIs have the same characteristics as other matters associated with performance evaluation applicable across all leadership levels, meaning that the bonus varies according to the achieved results. These conditions are duly approved and updated annually. At the same time, the importance attributed to safety is reflected in an annual objective shared across the entire organisation, based on proactive indicators, which carries a weighting of 5% in the final performance assessment and contributes to the payment of the annual bonus. [ESRS 2.29 | ESRS 2.29a | ESRS 2.29b | ESRS 2.29c | ESRS 2.29e]

Approximately 5% of variable remuneration depends on sustainability-related objectives and/or impacts, this figure having been estimated. [ESRS 2.29d]

Secil considers the impact of climate-related matters in the remuneration of certain members of the administrative, management and supervisory bodies. [E1.GOV-3]

### GOV-4 – Statement on sustainability due diligence

For information relating to the due diligence statement, please refer to the ESRS correspondence tables (Chapter 3.1.5.1.4).

### GOV-5 – Risk management and internal controls over sustainability reporting

The scope and main characteristics of Secil's risk management and internal control processes and systems relating to sustainability reporting include rigorous data input, validation and review measures to ensure the accuracy and reliability of the information reported across the Group. Quantitative data management is carried out through a centralised platform, which records the person responsible for each data entry, and the mandatory upload of supporting documents is required to ensure the traceability and verification of the information. In addition, the platform has been configured so that data validation is performed by individuals other than those responsible for data entry, ensuring dual verification and increasing the reliability of the process. For qualitative data, focal points responsible for each ESRS topic were identified and tasked with providing the necessary information for the non-financial information statement. Furthermore, each chapter of the non-financial information statement undergoes reviews at different levels of the organisation, ensuring a multidimensional analysis and alignment with corporate and regulatory commitments. [ESRS 2.36a]

Within Secil's risk management process, there is an ESG performance risk that includes, among other matters, the robustness and quality of sustainability data. In addition, mitigation measures have been defined, with their degree of implementation being monitored annually by internal management control. [ESRS 2.36b] This ESG performance risk entails mitigation strategies such as the implementation of mitigation measures, including improving the reliability and availability of ESG data collection systems, the periodic disclosure and external verification of sustainability information, and digital technologies supporting ESG information management systems. [ESRS 2.36c]

Following the risk assessment process and the evaluation of internal controls relating to the sustainability reporting process, mitigation measures are listed and responsibility for their implementation is delegated to the relevant areas. The monitoring of the implementation process of these measures is reviewed annually by internal management control. [ESRS 2.36d]

There is also an annual discussion of the risk assessment results within Secil's Board of Directors.

<sup>4</sup> Does not include the members of Semapa's Board of Directors.



### 3.1.1.3. Strategy

#### SBM-1: Strategy, business model and value chain

Information regarding the services provided and products offered, including any changes during the reporting period, namely new/discontinued products and/or services, is presented in Chapter 2.2. [ESRS 2.40a-1] Likewise, the markets served by the Company should be consulted in Chapter 2.3 [ESRS 2.40a-2], in which there are no prohibitions relating to the products or services provided by the Group. [ESRS 2.40a-4]

With regard to significant customer groups, there are four major groups, namely [ESRS 2.40a-1]:

- **Distribution / Retail**, which includes wholesalers, retailers and large-scale distribution chains – resellers of Secil products, with a margin;
- **Construction Industry**, comprising civil construction and civil engineering companies or, under another designation, construction and public works companies;
- **Construction Products Manufacturing Industry**, namely fixed installations including light and heavy precast plants – Precast; and ready-mix concrete production plants/facilities – Ready Mix Concrete;
- **Other Customers** that are more difficult to categorise, such as the mining industry.

The following information is incorporated by reference to other sections of this report: Number of employees by geographical area/country (ESRS 2.40a-iii): Chapter 3.1.3.1 – Characteristics of the company's employees (S1-6).

#### Business model and value chain

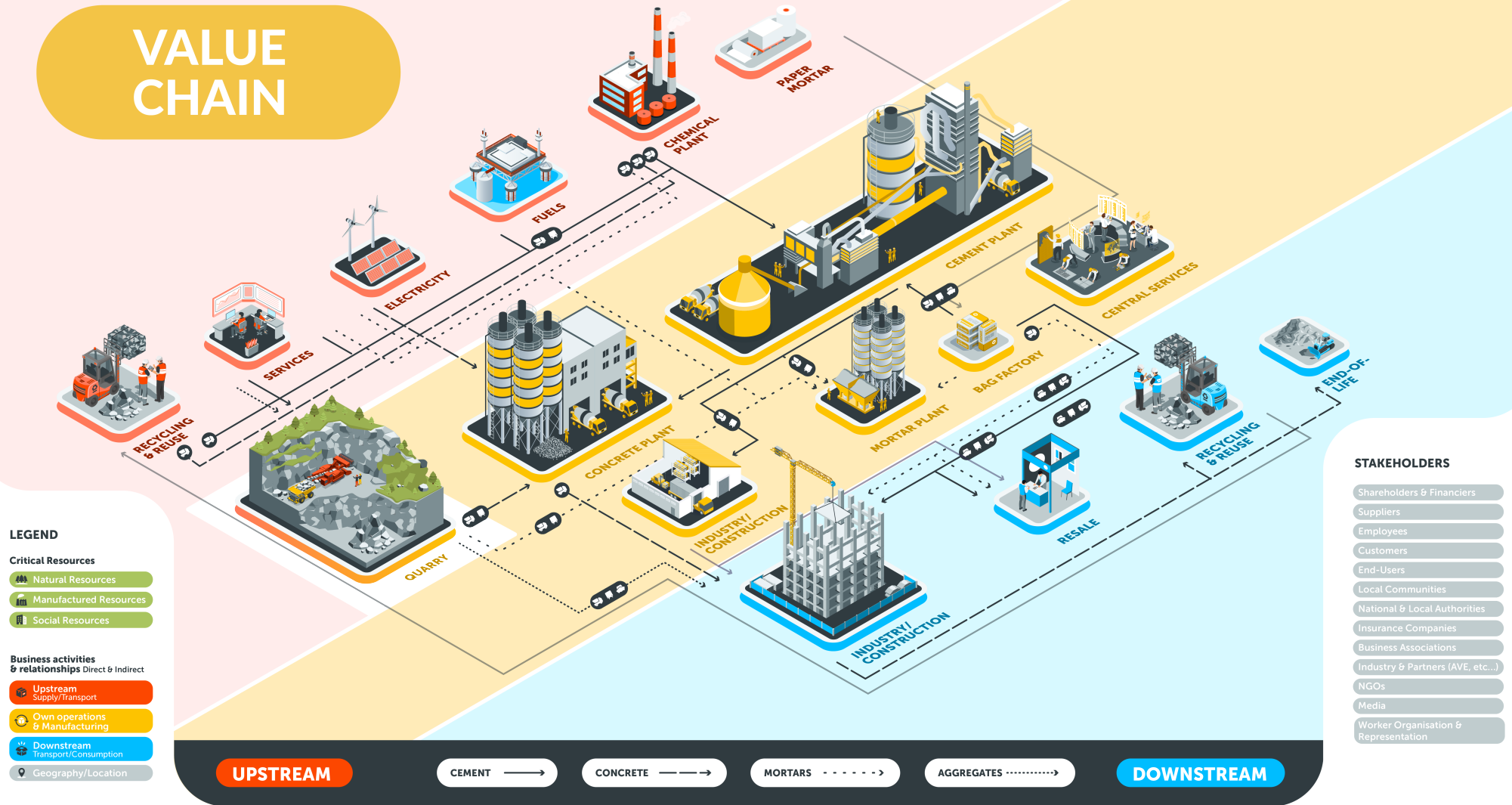
Secil's **business model** is based on the production and commercialisation of essential construction materials, such as cement, concrete, aggregates, mortars and hydraulic lime, complemented by technical support, logistics and innovation services. This integration enables synergies across the different operations, ensuring efficiency and a robust offering of innovative, high-quality solutions for customers. [ESRS 2.42]

In addition, Secil operates in an integrated manner across several geographies, with a presence in eight countries and four continents, reflecting its ability to diversify markets and adapt to different local contexts and needs. The business strategy is based on seven elements: customer, sustainability, innovation, people, operational performance, scale and diversification, and financial performance, supporting long-term objectives such as carbon neutrality by 2050. The combination of corporate governance, integrated production and interconnection between businesses consolidates the creation of sustainable value for shareholders, local communities and other stakeholders – see Chapter 2.3 (“Where we operate”) and Chapter 2.2 (“What we do”). [ESRS 2.42]

The following figure represents Secil's value chain, illustrating upstream activities, own operations and downstream activities, as well as the connection to key suppliers, distribution channels and customers. [ESRS 2.42c]



# VALUE CHAIN



Secil's main **inputs** include raw materials such as limestone and clay, energy, skilled labour, advanced technologies and financial resources. These factors are essential to sustain the company's integrated production process, which ranges from extraction to the commercialisation of products such as cement, concrete, aggregates, mortars and hydraulic lime. In addition, Secil invests in the use of alternative fuels and secondary raw materials, aligning with circular economy practices and reducing dependence on non-renewable natural resources. [ESRS 2.42a]

Secil's approach to sourcing, developing and securing these inputs combines technological innovation, digitalisation and operational optimisation. It relies on a global network of suppliers and partners to ensure the continuous supply of raw materials and energy, while also investing in Research, Development and Innovation (RDI) projects. At the same time, the company promotes continuous training and employee engagement, strengthening the quality of work and the ability to adapt to strategic challenges. [ESRS 2.42a]

Secil's **outputs** include a wide range of products such as cement, concrete, aggregates, mortars and hydraulic lime, all produced to high-quality standards and aligned with the requirements of the global market. In addition, the company provides complementary services such as technical support, laboratory services and advanced logistics solutions. These outputs ensure not only the functionality and durability of construction projects, but also deliver efficiency and innovation. This commitment translates into delivering more than construction materials: it aims to create spaces where customers can build homes and infrastructure that promote comfort, safety and well-being. [ESRS 2.42b]

The **outcomes** generated benefit several stakeholders: [ESRS 2.42b]

- **For customers**, Secil provides materials and services that not only meet their expectations, but also deliver a reliable and innovative construction experience.
- **For investors**, the company represents a solid investment, with robust and sustainable financial results.
- **For employees**, Secil provides a motivating work environment and appropriate conditions, enabling them to contribute to customer satisfaction and the company's success.
- **For communities**, Secil adopts a "do no harm" approach, minimising negative impacts and promoting local initiatives.
- **For regulatory entities**, the company delivers reliable results that reinforce trust and integrity in complying with legal requirements.

## Sustainability-related information

Sustainability is a central element of the Ambition 2025 strategy, with a very clear objective: to grow sustainably towards an EBITDA value above EUR 200 million. [ESRS 2.40g]

As a Group with a strong presence in the cement industrial sector, we aim to become the preferred choice for customers and to offer products with a lower carbon footprint. Therefore, we measure this objective through increased customer satisfaction and improvements in the Net Promoter Score (NPS). In addition, we act to achieve this objective, which is reflected in our sustainability framework – Ambition 2025 | Sustainable Growth – through the following topics: [ESRS 2.40e]

- 1 Customer focus, covered under the Economic pillar;**
- 2 Lower-carbon products, covered under the Environmental pillar, such as carbon neutrality and the circular economy.**



The remaining stakeholders, beyond customers, are engaged through the Social pillar topic of stakeholder engagement, which aims to ensure engagement management with all involved stakeholders. [ESRS 2.40e]

The double materiality assessment process, reformulated in 2024 and finalised and reviewed in 2025, aimed to identify the material Impacts, Risks and Opportunities (IROs) for Secil Group, within the context of Grupo Semapa, already aligned with the European Sustainability Reporting Standards (ESRS).

The following information is incorporated by reference to other sections of the management report:

- Exemption from the disclosure of the information referred to in Article 18(1)(a) of Directive 2013/34/EU (ESRS 2.41): note 2.1 relating to business segments in the Financial Statements.

## Sustainability Framework

### ENVIRONMENTAL



Carbon Neutrality  
Air Emissions  
Circular Economy  
Energy  
Biodiversity  
Water

### SOCIAL



Health & Safety  
Stakeholder Engagement  
Social Responsibility  
Diversity, Equity & Inclusion  
Human & Labor rights

### GOVERNANCE



Corporate Governance  
Organization Strategy  
Ethics & Compliance  
Sustainability Management  
Reporting

### ECONOMIC



Sustainable Economic growth  
Sustainable Finance  
Sustainable Procurement  
Customer centricity



One page Strategy

# AMBITION

Sustainable Growth | 2025

## Sustainable Growth

We want to be recognised as a sustainable company that is committed to achieving carbon neutrality by 2050.

### Protecting the climate and the environment

**1 Carbon Neutrality**  
Achieving carbon neutrality along the cement and concrete value chain by 2025

↓ Cutting CO<sub>2</sub> <sup>(1)(2)</sup> emissions by 30%

**2 Circular Economy**  
Moving towards a circular economy by co-processing alternative fuels and raw materials

↑ Achieving an alternative fuel <sup>(3)</sup> use rate of 49%

### Valuing people and the community

**3 Local Communities**  
Developing strong local synergies, giving back to our neighbours and stakeholders

↑ Doubling the investment in local communities

**4 Health & Safety**  
Achieving a health and safety culture that allows an accident frequency rate below 1.5 and zero fatalities

↓ 75% reduction in accident frequency rate <sup>(1)</sup>

**5 Diversity, Equity & Inclusion**  
Supporting equal opportunities and promoting diversity in management decisions

↑ 20% increase in female participation

## Governance Principles

To respect Human and Workers' Rights with Ethics and Corporate Responsibility, creating value for all Stakeholders.

(1) Targets 2030, baseline 2020; (2) Target approved by SBTi scope 1 & 2 (30.4%); (3) Target 2030



Until 2025, the Group established within its strategic plan the objective of being recognised as a responsible and sustainable company, committed to decarbonisation by 2050. [ESRS 2.40g] In addition, it aims to align its economic performance with the dimensions of sustainable development, namely the environmental, social and governance (ESG) dimensions. In this context, its sustainability strategy includes several structuring elements for its business, referred to below: [ESRS 2.40g]

- Achieve carbon neutrality in the cement and concrete value chain by 2050;
- Contribute to a circular economy by increasing the use of alternative fuels and secondary raw materials;
- Build a health and safety culture that enables the reduction of workplace accidents and the elimination of fatalities;
- Support equal opportunities and promote diversity in management decisions;
- Support local communities;
- Be the preferred solution for its customers;
- Ensure respect for human rights and workers through ethics, integrity and corporate responsibility.

Sustainability management is based on customer focus and close engagement with the various stakeholders, namely communities, institutions and institutional partners, through the adoption of best corporate governance practices and by addressing the challenges that Secil's activities generate for the environment and society. [ESRS 2.40g]

The greatest challenge identified by Secil for the coming years is decarbonisation (Chapter 3.1.2.2). [ESRS 2.40g]

Within its decarbonisation plan (Chapter 3.1.2.2), Secil foresees the launch of lower-carbon products onto the market. This plan establishes Secil's pathway for the decarbonisation of its cement plants, applicable across all geographies. In addition, it foresees an investment of EUR 150 million in decarbonisation projects, impacting the traditional levers, namely: alternative fuels and secondary raw materials, low-carbon clinker, clinker factor reduction and thermal energy efficiency measures. [ESRS 2.40f]

In 2024, a customer survey was conducted regarding the existence of a sustainability strategy at Secil. Of the respondents, 40% stated that they were aware of the existence of this strategy, while 60% indicated that they were not aware of it. [ESRS 2.40f]

As this result was not considered satisfactory, several actions were implemented in 2025 with the aim of strengthening communication and customer engagement regarding our sustainability strategy:

- Organisation of factory visits with customers, during which Secil's strategy and the main sustainability initiatives associated with the business are presented;
- Reinforcement of sustainability communication at exhibition stands and during trade fair events;
- Promotion and disclosure of Secil's Environmental Product Declarations (EPDs), documentation which, for certain projects, is already essential for the eligibility of our products;
- Launch of the BE CONCRETE initiative, promoted by the Marketing team, with the aim of aligning messages, actions and communication spaces, ensuring a structured and consistent communication of the sustainability message to the market.

The results of the 2025 survey demonstrate a slight improvement in customers' awareness of the existence of a sustainability strategy at Secil. Of the respondents, 43% stated that they were aware of the existence of this strategy, while 57% indicated that they were not. [ESRS 2.40f]

## Revenue

In 2025, Secil generated total revenue exceeding EUR 750 million. Revenue is presented in note 2.1 of the Consolidated Financial Statements.

The Group does not generate revenue associated with fossil fuels (coal, oil and gas) [ESRS 2.40d-1], the production of chemicals [ESRS 2.40d-2], controversial weapons [ESRS 2.40d-3], or the cultivation and production of tobacco. [ESRS 2.40d-4]

The following information is incorporated by reference to other sections of the management report:

- Description of the Group's product and/or service markets and markets served (ESRS 2.40a-i/ii) – see Chapter 2.3.

### **SBM-2: Interests and views of stakeholders**

Secil maintains structured engagement with different stakeholder groups, such as employees, customers, local communities, regulatory authorities and investors. The plan aims to establish strategic relationships to increase brand awareness, foster innovation and ensure that the company's objectives are aligned with stakeholders' expectations. The company uses various channels and forms of interaction, such as regular meetings, events, conferences, technical visits and digital communication methods, including the website, LinkedIn and emails, to ensure efficient and continuous communication. [ESRS 2.45a]

Engagement with each stakeholder group is carried out through the internal definition of the person or team responsible for managing the relationship, the engagement objectives, relevant topics, key messages for each group, regular engagement methods, communication channels used, frequency of interactions with each group, feedback collection tools, indicators relating to stakeholder participation or response rates in activities or programmes organised by Secil, key performance indicators used to measure the success of engagement, and specific initiative plans to be developed for each stakeholder group. These performance indicators, recently established, help measure the impact of implemented actions and are used to adjust strategies, prioritise initiatives and develop new programmes that strengthen trust and collaboration with stakeholders. [ESRS 2.45a-3 | ESRS 2.45a-5 | ESRS 2.45b | ESRS 2.45d]

The main stakeholders of Secil Group, and the purposes of its engagement with them, vary according to the stakeholder category, as outlined below: [ESRS 2.45a-4 | ESRS 2.45a-1 | ESRS 2.45a-2]

<b>Stakeholder group</b> [ESRS 2.45a-1]	<b>Purpose of engagement</b> [ESRS 2.45a-4]
<b>Academia:</b> Higher education institutions, educational institutions and Research & Development centres.	<b>Higher education institutions:</b> Establish relationships to increase the company's attractiveness to young talent. <b>Educational institutions:</b> Promote and enhance Secil's activities and products. <b>R&amp;D centres:</b> Mobilise academia to support the development of our Research, Development and Innovation projects.
<b>Shareholders:</b> Semapa.	Communicate with transparency and effectiveness to facilitate the decision-making process.
<b>Sector business associations:</b> National and international (e.g. GCCA).	<b>National:</b> Increase reputation and visibility as a responsible and sustainable company. <b>International (e.g. GCCA):</b> Be recognised as a sustainable and responsible company.
<b>Customers:</b> Distribution, industry, construction, real estate developers and specifiers.	Secil aims to be the preferred cement solutions provider in the communities it serves.
<b>Employees:</b> Direct and indirect employees.	Be the preferred company for the people it seeks to attract, retain and develop.
<b>Employee representative structures</b>	Establish relationships to ensure labour stability.
<b>Media:</b> Local and specialised national media.	<b>Local:</b> Increase reputation and visibility as a responsible and sustainable company. <b>Specialised national:</b> Communicate Secil brands and solutions, defend and promote concrete construction, and increase reputation.
<b>Community:</b> Local entities and NGOs   Professional associations.	Shape ideas by promoting responsible citizenship within the Group's communities.
<b>Financial entities and insurers:</b> Banks and insurance	Act responsibly and ensure compliance with the regulations and directives to which the company is subject, with transparency.
<b>Suppliers, partners and service providers:</b> Suppliers/ service providers and business partners.	<b>Suppliers/service providers:</b> Establish mutually beneficial relationships with suppliers. <b>Business partners:</b> Align strategies and share best practices, particularly in relation to environmental sustainability and innovation.

Secil has a formal **stakeholder engagement policy**, approved by the Executive Committee (Chapter 3.1.4.1), which establishes that stakeholders should be consulted regularly in order to understand their concerns and interests. Regular consultations are brought, whenever necessary, by each stakeholder lead to the Executive Committee. Another engagement moment is planned within future Double Materiality Assessment exercises. This engagement enables Secil Group to understand the interests and views of stakeholders, which impact the company's strategy and business model in different ways. [ESRS 2.45b | ESRS 2.45d]



**1. Stakeholder engagement:** Secil regularly engages with various stakeholder groups, such as academia, as described at the beginning of this section.

**2. Environmental monitoring committees:** Secil has, at its Adrianópolis and Pomerode plants in Brazil, and in Portugal at the Maceira-Liz and Outão plants, a mechanism for the regular consultation of stakeholders from the communities surrounding these industrial units, known as Environmental Monitoring Committees, which meet regularly three or four times a year to analyse the environmental and safety performance of these facilities, as well as to share the expectations and needs of these communities. [ESRS 2.45b | ESRS 2.45d] This forum includes representatives from central and local government, educational institutions, healthcare units, environmental and local development associations, fire brigades and other relevant entities from each of the communities. The meetings are attended by company representatives, ranging from members of Management to technical staff responsible for the departments involved in each topic under discussion. [ESRS 2.45b | ESRS 2.45d]

At the same time, specific matters subject to formal complaints or requests for information, where relevant, are shared with Management in order to frame the response provided to stakeholders. [ESRS 2.45b | ESRS 2.45d]

**3. Meetings between responsible managers and their respective stakeholders:** These meetings address more specific topics and seek stakeholders' views on those matters. [ESRS 2.45b | ESRS 2.45d]

**4. Materiality assessment:** This involved the managers responsible for these stakeholders, in order to represent their perspectives during the materiality assessment process. [ESRS 2.45b | ESRS 2.45d] Progressive involvement of all external stakeholders is planned for future exercises.

It should be noted that, in 2025, there were no changes to the company's strategy or business model. However, a new strategic cycle is being defined, which will be in force from 2026 to 2030. [ESRS 2.45c]

The company recognises the interests, views and rights of people within its own workforce as fundamental elements informing its strategy and business model. This commitment is anchored in Secil's values and Human Rights Policy. The "People" value, in particular, reflects the respect for and appreciation of all employees. [S1.12] In addition, Secil's Code of Conduct establishes clear guidelines to ensure ethical and responsible practices, promoting an inclusive, fair and safe working environment. [S1.12]

The inclusion of direct employees in strategic decision-making processes is ensured through structured dialogue and participation mechanisms, such as:

- Regular employee satisfaction and engagement surveys. These enable the collection of opinions regarding working conditions, organisational culture and well-being;
- Formal and informal internal communication channels, which allow for the continuous exchange of ideas, concerns and suggestions;
- Specific committees and working groups focused on promoting safety, health, equal opportunities and diversity in the workplace.



The contributions collected are analysed and incorporated into management decisions, guiding initiatives such as:

- Continuous improvement of working conditions, with emphasis on health, safety and well-being;
- Development of training and capacity-building programmes, creating career progression opportunities;
- Strengthening policies aimed at balancing professional and personal life;
- Promotion of diversity and equal opportunities, eliminating barriers to inclusion and the full development of each employee;

Additionally, **workers from labour supplier companies** are also covered through the Human Rights Policy and Secil's Code of Conduct, which require compliance with labour and ethical standards aligned with the company's values. [S1.12]

The interests, views and rights of **workers in the value chain**, including respect for their human rights, may be significantly impacted by the company's operations. From a health and safety perspective, contracted workers operating at Secil facilities are exposed to workplace risks, such as machinery, dust or hazardous materials, which may compromise their health and safety if appropriate control measures are not implemented. Insufficient training, lack of access to protective equipment and inadequate communication of safety protocols increase vulnerability to accidents and injuries. To mitigate these risks and safeguard workers' well-being, it is essential to ensure a safe working environment, access to safety resources and respect for human dignity. [S2.9]

With regard to health and safety, the interests, views and rights of workers in the value chain, including contracted workers, directly influence the strategy and business model by ensuring a proactive approach to workplace safety, compliance and stakeholder engagement. [S2.9 | AR5]

The requirement for comprehensive safety induction training for all contracted workers entering the facilities reflects the company's commitment to raising awareness of existing risks, protocols and emergency procedures, thereby promoting a safety culture. In addition, the registration system for the issuance of Personal Protective Equipment (PPE), worker certifications and training records enables continuous monitoring and reinforces accountability, ensuring that all individuals are properly equipped and qualified. [S2.9 | AR5]

These measures ensure respect for workers' rights to a safe environment and contribute to operational efficiency, risk management and the company's reputation as a responsible and sustainable business. Supplier assessment and relationship management processes are also carried out, through which we collaborate jointly to maximise opportunities and mitigate risks. [S2.9 | AR5]

The interests, views and rights of **affected communities** may be materially impacted by Secil, particularly in the context of priority impacts. These impacts may be observed in several areas, such as the creation of local employment and the promotion of fair working conditions, the integration of local suppliers into the value chain and regional economic development (e.g. through investment in infrastructure, purchases from local businesses and social responsibility projects).

By aligning its practices with the material impact "Decent Work and Economic Growth", Secil reinforces respect for community rights, promoting a balanced relationship between business interests and social well-being [S3.7]. In addition, reference should be made to the existence of the Environmental Monitoring Committees, the primary structure for dialogue with community representatives and for gathering information to support the management of Secil's operations (Chapter 3.1.2 and Chapter 3.1.3.3).

Growing concern regarding the well-being of communities (both affected communities and society at large) has required the sector, and consequently Secil, to incorporate more sustainable production solutions into its sustainability management. This is reflected in the urgent need to create products with a lower environmental impact and in the definition of a medium- and long-term roadmap that ensures a carbon-neutral future. [S3.7]

## STRATEGY

## **SBM-3: Material impacts, risks and opportunities and their interaction with the strategy and business model**

### **Impacts, risks and opportunities**

Secil's material impacts are directly connected to its strategy and business model. For example, negative impacts such as greenhouse gas emissions (Scopes 1, 2 and 3) are directly linked to Secil's business model, as cement production generates significant emissions, particularly CO<sub>2</sub> emissions. The company's strategy addresses these impacts through mitigation initiatives, such as increasing the use of alternative fuels, developing low-carbon products and investing in decarbonisation technologies. [ESRS 2.48c-2]

Within the Social pillar, the positive impact related to workforce development and continuous skills assessment contributes to the professional and personal growth of employees. This impact is also connected to the company's strategy and business model, as Secil implements regular training and development programmes aligned with the specific needs of its employees and the requirements of its industrial operations. These initiatives aim not only to improve operational performance, but also to promote individual growth, fostering a motivating and inclusive working environment. [ESRS 2.48c-2]

### **Our contribution to the SDGs (Sustainable Development Goals)**

Secil incorporates the SDGs into its Sustainability strategy and has classified them into three levels of importance: strategic SDGs, relevant SDGs and supporting SDGs.



### STRATEGIC SDGs



#### INDUSTRY, INNOVATION AND INFRASTRUCTURE

Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation..

**Targets: 9.1; 9.2; 9.4; 9.5**



#### RESPONSIBLE CONSUMPTION AND PRODUCTION

Ensure sustainable consumption and production patterns.

**Targets: 12.2; 12.4; 12.5; 12.8**



#### CLIMATE ACTION

Take urgent action to combat climate change and its impacts.

**Targets: 13.3; 13.2; 13.3**

### RELEVANT SDGs



#### GOOD HEALTH AND WELL-BEING

Ensure healthy lives and promote well-being for all at all ages.

**Targets: 3.4; 3.5; 3.6; 3.8; 3.9**



#### DECENT WORK AND ECONOMIC GROWTH

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

**Targets: 8.1; 8.3; 8.4; 8.5; 8.6; 8.8**



#### SUSTAINABLE CITIES AND COMMUNITIES

Make cities and human settlements inclusive, safe, resilient and sustainable.

**Targets: 11.3; 11.4; 11.6**

### SUPPORTING SDGs



#### PARTNERSHIPS FOR THE GOALS

Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development.

**Targets: 17.16; 17.17**



## Secil's main contributions to the achievement of the SDGs



### Environment

Promotion of climate change impact reduction. Commitment to decarbonisation. Optimisation of energy consumption and use of alternative energy sources, including renewables. Promotion of the circular economy and efficient use of natural resources. Enhancement and protection of biodiversity. Development of RDI projects and establishment of partnerships to provide solutions.



### Social

Promotion of close relationships and stakeholder engagement. Support for local communities in the geographies where the company operates. Contribution to the promotion of decent work, employee development and career progression support, as well as health, safety and well-being initiatives. Promotion of diversity, equity, inclusion and non-discrimination in human resources management. Promotion of Human Rights both internally and externally.



### Governance

Definition of clear and monitored objectives for the various commitments integrated into the Strategic Plan – Ambition 2025 – Sustainable Growth. Governance model supported by rules of ethics and conduct, integrity and transparency, and accountability. Promotion of a risk management model based on risk identification, the creation of mitigation measures, and their monitoring and assessment.



### Economic

Promotion of economic growth and the creation of employment and wealth in the geographies where the company operates. Promotion of decent work through the protection of labour rights.

Contribution to innovation and the development of new products and projects, alongside a strong focus on product quality and safety. Promotion of sustainability throughout its value chain and of trusted relationships with customers and suppliers.



The following information is incorporated by reference to other sections of the non-financial information statement, namely to the chapters of the thematic standards, for detailed information on:



- Description of the material impacts resulting from the materiality assessment (ESRS 2.48a)
- Description of the material risks and opportunities resulting from the materiality assessment (ESRS 2.48a)
- Description of the time horizons (ESRS 2.48c iii)
- Specification of the impacts, risks and opportunities covered by the ESRS disclosure requirements (ESRS 2.48h)

The material IROs listed throughout the various chapters of this non-financial information statement also include information relating to the value chain. Where the impact is located within own operations, this means that it arises from Secil's activities; however, where it is located upstream or downstream, it arises from business relationships. This information is described in greater detail in the chapters relating to sustainability topics (Chapter 3.1.1.4). [ESRS 2.48c-2]

### Resilience of the strategy and business model

Sustainability is a central element of the Ambition 2025 strategy, which aims to achieve sustainable growth. Until 2025, the Group established within its strategic plan the objective of being recognised as a responsible and sustainable company, committed not only to decarbonisation by 2050, but also to its environmental, social and governance (ESG) dimensions. [ESRS 2.48f]

### Financial effects

In accordance with Appendix C of ESRS 1, Secil has opted not to report information regarding the anticipated financial effects of impacts, risks and opportunities. [ESRS 2.48e]

Over the coming years, Secil will carry out a quantitative analysis of sustainability-related risks and an assessment of the financial position of its assets and liabilities.

### Changes in material IROs compared with the previous reporting period

In 2025, a review of the double materiality assessment was carried out. As a result of this process, the sub-sub-topic "Prevention and detection, including training", integrated within the sub-topic "Corruption and bribery", began to be considered material for Secil. All other topics and sub-topics maintained their previous classification. [ESRS 2.48g]

### 3.1.1.4. Management of impacts, risks and opportunities

#### IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

Secil is part of a group that falls within the scope of the Non-Financial Reporting Directive (NFRD). Accordingly, Secil opted for the voluntary implementation of the new CSRD Directive – relating to information for the 2024 financial year to be published in 2025. The various stages of the double materiality process carried out, as well as the methodologies applied and the results obtained, are presented below.

The materiality assessment was conducted based on a comprehensive process aimed at identifying, assessing, prioritising and monitoring potential and actual impacts, both positive and negative, on people and the environment, in the short, medium and long term (impact materiality, inside-out perspective), as well as risks and opportunities that may, in turn, have a financial effect on the company (financial materiality, outside-in perspective). The assessment, according to these two perspectives hereinafter referred to as “Double Materiality”, was carried out within the context of each ESRS Standard, covering environmental, social and governance matters. [ESRS 2.53a]

The double materiality assessment followed a methodological approach consisting of four stages. This process structure will be reviewed at least annually (or whenever necessary) to ensure alignment with the most recent practices. [ESRS 2.53a]

1) Understanding	2. Identification	3. Assessment	4. Determination
<b>Understand the business, the value chain and related activities</b>	<b>Identify impacts, risks and opportunities (IROs)</b>	<b>Assess the IROs</b>	<b>Determine the material topics</b>
Analyse internal operations, business model and available data.  Map the value chain. Identify relevant topics.  Stakeholder engagement.	Conduct research and analyses to identify relevant IROs, using sector references, internal documents and stakeholder consultation.  Validate and prioritise the identified IROs for assessment.	Define the threshold applicable to impact and financial materiality.  Assess impact materiality and financial materiality.	Identify the IROs that are above the established threshold.  Validate the final list of IROs and, if necessary, carry out calibration.
<b>Outcome</b>			
Value chain mapping; list of relevant topics resulting from stakeholder consultation.	Preliminary list of IROs.	Preliminary results of the IRO assessment.	Final list of material topics.

#### Contextual information and identification of IROs

The initial stage considered the business and operational processes of the organisation’s own operations, including the geographies in which the Group operates, as well as upstream and downstream business relationships (value chain mapping).

The identification stage, aimed at compiling a preliminary list of impacts, risks and opportunities, involved several sources of information, including general resources, sustainability reports and internal resources of Secil Group, as well as external resources. Based on the research carried out, a list comprising a total of 320 IROs was developed at the ESRS sub-sub-topic level and mapped across Secil’s business model, the geographies in which its activities are carried out, and their location along the value chain. [ESRS 2.53a | ESRS 2.53b i/ii/iii | ESRS 2.53g]

General Resources	Sustainability Reporting	Internal Resources	External Resources
<p>In a stage preceding the identification of impacts, risks and opportunities, regulatory instruments and guidance documents were consulted for the application of the double materiality assessment.</p> <ul style="list-style-type: none"> <li>Delegated Regulation (EU) 2023/2772;</li> <li>EFRAG IG1 Materiality Assessment;</li> <li>EFRAG IG2 Value Chain;</li> <li>EFRAG IG3 List of ESRS Datapoints (explanatory note + excel).</li> </ul>	<p>An IRO database was developed through the review of existing reports. Among these, the following stand out:</p> <ul style="list-style-type: none"> <li>Secil – Sustainability Report 2023.</li> </ul>	<p>Review of internal resources relevant to the identification of IROs and the definition of the assessment methodology.</p> <ul style="list-style-type: none"> <li>Secil materiality assessment 2022 and 2023;</li> <li>Semapa Group – list of identified risks and opportunities;</li> <li>Risk assessment methodology (ERM).</li> </ul>	<p>Consultation of external information sources relevant to Secil’s business segments. Among the applicable sources, the following stand out:</p> <ul style="list-style-type: none"> <li>TNFD. Draft Sector Guidance – Construction Materials;</li> <li>Repository of IROs from the consulting team.</li> </ul>

In addition to the resources listed above, the inputs of the various internal specialists who participated in the different validation and assessment working sessions were considered throughout the four phases of the double materiality assessment.

### Description of the processes to identify and assess environmental IROs

As mentioned above, the Double Materiality Assessment covered all ESRS Standards, with the same methodology and criteria being used to determine and assess the IROs identified under each thematic standard. In addition, specific aspects were considered in the context of certain thematic standards, particularly environmental ones, which are presented below.

The determination of environmental aspects is carried out for Secil’s activities, products and services covered by the scope defined for the Environmental Management System. The cement plants in Portugal have their environmental management systems certified under NP EN ISO 14001:2015 and under the Eco-Management and Audit Scheme (EMAS). In accordance with these two methodologies, environmental aspects and impacts are identified, as well as the risks and opportunities associated with environmental aspects in operations. The EMAS statement publishes all information relating to the environmental aspects with the most significant impact, as well as the policies and measures adopted to minimise negative impacts and enhance positive ones. The plants in Tunisia and Lebanon also hold ISO 14001:2015 environmental certification, which includes the management of environmental aspects. The Brazilian plant has implemented an Environmental Management System, although it is not certified under ISO standards. Secil’s policy aims to ensure compliance with all environmental licence requirements applicable to the facilities, associated with the control and prevention of pollution arising from industrial activity, while taking into consideration best practice measures and the best available techniques/ technologies (BAT).

For the identification of environmental IROs, information resulting from the Identification and Assessment of Environmental Aspects and Impacts was considered, in accordance with Secil Management System procedure 01 PT A 00 01, which is subsequently reflected in the various LAIA matrices – Determination of environmental aspects and their respective risks and opportunities for the Outão, Maceira, Pataias plants, offices and depots, available on the SE-Suite management system support platform.



Secil assessed climate-related physical risks relevant to its activities, across its operations and throughout the upstream and downstream value chain (Chapter 3.1.1.3), in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). Secil is currently in Phase 3 – Financial Impact Assessment and Financial Impact Estimation. [E1.IRO-1 | E1.20b | E1.20c | E1.21]

With regard to Secil's operations, the cement business – particularly our plants – stands out as the area of greatest relevance in terms of **pollution** impact. These facilities have an environmental roadmap that defines a set of actions to be implemented. [E2.AR9]

Secil considered, within its double materiality assessment process, the results of a socio-economic impact study carried out in 2024 at Maceira and Outão, which included the quarry rehabilitation and **biodiversity** component, as well as a population survey relating to the Outão facility addressing the main environmental issues. [E4.17e]

It should be noted that quarrying activities associated with the cement industry and aggregate production have negative impacts on **habitats** and related **fauna and flora species**. The rehabilitation of exploited areas is a legal obligation for cement companies in Europe. In Secil's case, the rehabilitation of these areas is particularly important as they are located within classified areas, such as the Arrábida Natural Park and Natura 2000 Network sites. The restoration of degraded ecosystems is a significant scientific challenge, especially where the level of degradation is high, as is the case with quarries, requiring extensive underlying ecological knowledge. Secil sought at an early stage to develop solutions supported by applied research projects, in partnership with universities and researchers specialised in ecosystem restoration. [E4.19a]

One of the mitigation measures consists of the rehabilitation of exploited areas. As there are bird species listed under Annexes I and II of the Birds Directive, habitats listed under Annex I and species listed under Annexes II and IV of the Habitats Directive, efforts have been made to promote habitat creation within these areas through ecological restoration, thereby mitigating impacts and improving conditions for the occurrence of these species. With regard to Directive 2011/92/EU, where applicable, namely for quarries subject to Environmental Impact Assessment, the mitigation measures established in the Environmental Impact Statement are complied with. [E4.19b]

In Portugal, we also have the EH&S Committee – Environment, Health and Safety Committee, which meets periodically with the participation of employee representatives and company representatives to analyse and discuss relevant environmental matters.

It should also be highlighted that the internal experts who participated in the IRO assessment sessions came from various areas, including sustainability, commercial, legal, internal audit and human resources, among others, in order to ensure that the description and assessment of the IROs were appropriate to the respective topics. Feedback from the Monitoring Committees was also taken into consideration.

## Process for assessing material IROs

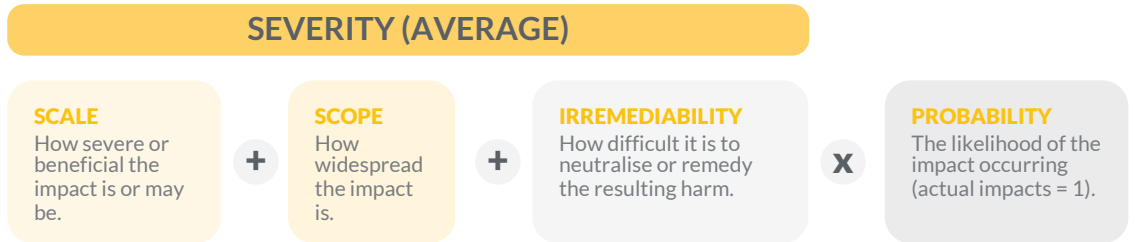
The IRO assessment process was carried out through a total of 29 meetings, involving the participation of 19 internal Secil experts from 11 different areas. During the sessions dedicated to each ESRS Standard, each expert provided their opinion on each IRO, with the final assessment resulting from a consensus among the various participants involved. [ESRS 2.53a | ESRS 2.53b iii]

## Impact materiality

When assessing impact materiality, negative and positive, actual and potential impacts were considered, based on their severity (a combination of scale, scope and irremediable character (applicable only to negative impacts)) and likelihood (which is not considered for the calculation of the materiality of negative impacts on human rights, in which case the severity score prevails over the likelihood score). Using quantitative thresholds for each parameter, the material impacts of Secil Group were identified. [ESRS 2.53a | ESRS 2.53b iv]



### Impact materiality assessment factors



### Methodology of the applied assessment

<b>SCALE</b>	<ul style="list-style-type: none"> <li>5= Very high harm or benefits for people or the environment</li> <li>4= High harm or benefits for people or the environment</li> <li>3= Moderate harm or benefits for people or the environment</li> <li>2= Low harm or benefits for people or the environment</li> <li>1= Very low harm or benefits for people or the environment</li> <li>0= Not applicable</li> </ul>
<b>SCOPE</b>	<ul style="list-style-type: none"> <li>5= National or international impact and/or impact on a large number of people</li> <li>3= Regional impact and/or impact on a moderate number of people</li> <li>1= Local impact and/or impact on a limited number of people</li> <li>0= Not applicable</li> </ul>
<b>IRREMEADIABILITY</b>	<ul style="list-style-type: none"> <li>5= National or international impact and/or impact on a large number of people</li> <li>3= Regional impact and/or impact on a moderate number of people</li> <li>1= Local impact and/or impact on a limited number of people</li> <li>0= Not applicable</li> </ul>
<b>PROBABILITY</b>	<ul style="list-style-type: none"> <li>1= Certain (&lt; 6 months   Occurring)</li> <li>0,80= Highly likely (6 months to 1 year)</li> <li>0,60= Likely (1 to 2 years)</li> <li>0,40= Unlikely (2 to 5 years)</li> <li>0,20= Rare (&gt; 5 years)</li> </ul>
<b>TIME HORIZON</b>	<ul style="list-style-type: none"> <li><b>Short-term:</b> reporting year</li> <li><b>Medium-term:</b> between the reporting year and up to 5 years</li> <li><b>Long-term:</b> more than 5 years</li> </ul>



## Financial materiality

In parallel, a process was established in which the potential links between impacts, dependencies on resources and relationships, and the resulting risks and opportunities were taken into consideration.

When assessing financial materiality, using quantitative thresholds, the likelihood and magnitude of the financial effects of risks and opportunities were evaluated and, consequently, Secil Group's material risks and opportunities were identified. It should be noted that, with regard to the magnitude criterion, the defined scoring scales were based on ranges corresponding to a percentage of EBITDA. [ESRS 2.53c]

## Impact materiality assessment factors

### MAGNITUDE

Magnitude of the potential financial effect.

X

### PROBABILITY

The likelihood of the risk/opportunity occurring.

## Applied assessment methodology

### MAGNITUDE

- 5= Critical - Above 20% of EBITDA
- 4= High - Between 10% and 20% of EBITDA
- 3= Medium - Between 5% and 10% of EBITDA
- 2= Low - Between 1% and 5% of EBITDA
- 1= Very low - Up to 1% of EBITDA
- 0= Not applicable

### PROBABILITY

- 1= Certain (< 6 months | Occurring)
- 0,80= Highly likely (6 months to 1 year)
- 0,60= Likely (1 to 2 years)
- 0,40= Unlikely (2 to 5 years)
- 0,20= Rare (> 5 years)

### TIME HORIZON

- Short-term:** reporting year
- Medium term:** between the reporting year and up to 5 years
- Longo prazo:** more than 5 years



## Review of the double materiality assessment

In 2025, a review of the double materiality assessment was carried out in order to incorporate, in greater depth, the perspective of the different geographies within Secil Group.

As part of this review, the assessment of impacts, risks and opportunities with scores between 2.5 and 3.2 was revisited. Secil’s corporate focal points, responsible for the topics with IROs within the defined range, met with the focal points from the different geographies to jointly review and validate the assigned assessments. In total, 3 meetings were held.

As a result of this process, the sub-sub-topic “Prevention and detection, including training”, integrated within the sub-topic “Corruption and bribery”, began to be considered material for Secil. All other topics and sub-topics maintained their previous classification.

## Conclusion of the double materiality process, including the review

Following the completion of the assessment sessions, a threshold of 3 was defined for Secil, applicable to both impact and financial materiality. The selection of this threshold aimed to follow the same materiality limit established by the internal risk assessments. [ESRS 2.53d]

A sustainability topic is considered “material” when it meets the criteria defined for impact materiality, financial materiality, or both – within the scope of the exercise carried out by Secil Group, all IROs that obtained an overall assessment equal to or greater than 3 were classified as such. Following the determination of the results obtained, a verification was carried out by internal specialists of the impacts, risks and opportunities that achieved an overall score between 2 and 3. [ESRS 2.53d | ESRS 2.53g]

This calibration exercise followed the same calculation formulas described above. Following the review carried out in 2025, the final list of material IROs for Secil comprises 42 impacts (15 positive and 27 negative), 14 risks and opportunities (6 risks and 8 opportunities), with the following distribution:





These results were subsequently approved by Secil's Executive Committee. The material impacts, risks and opportunities will be incorporated into Secil's overall risk management process. [ESRS 2.53d | ESRS 2.53e | ESRS 2.53f]

### **IRO-2 – ESRS disclosure requirements covered by the company's non-financial information statement**

The materiality of the information was determined based on the material IROs resulting from Secil's double materiality assessment. Following the identification of the material thematic standards, materiality was assessed at the level of disclosure requirements and datapoints. The materiality assessment process and the use of thresholds are described in the previous section (IRO-1). [ESRS 2.59]

The disclosure requirements addressed by Secil through this non-financial information statement, as well as the list of datapoints arising from other EU legislation, are identified in Chapter 3.1.5.1 ESRS Correspondence Tables. [ESRS 2.56]

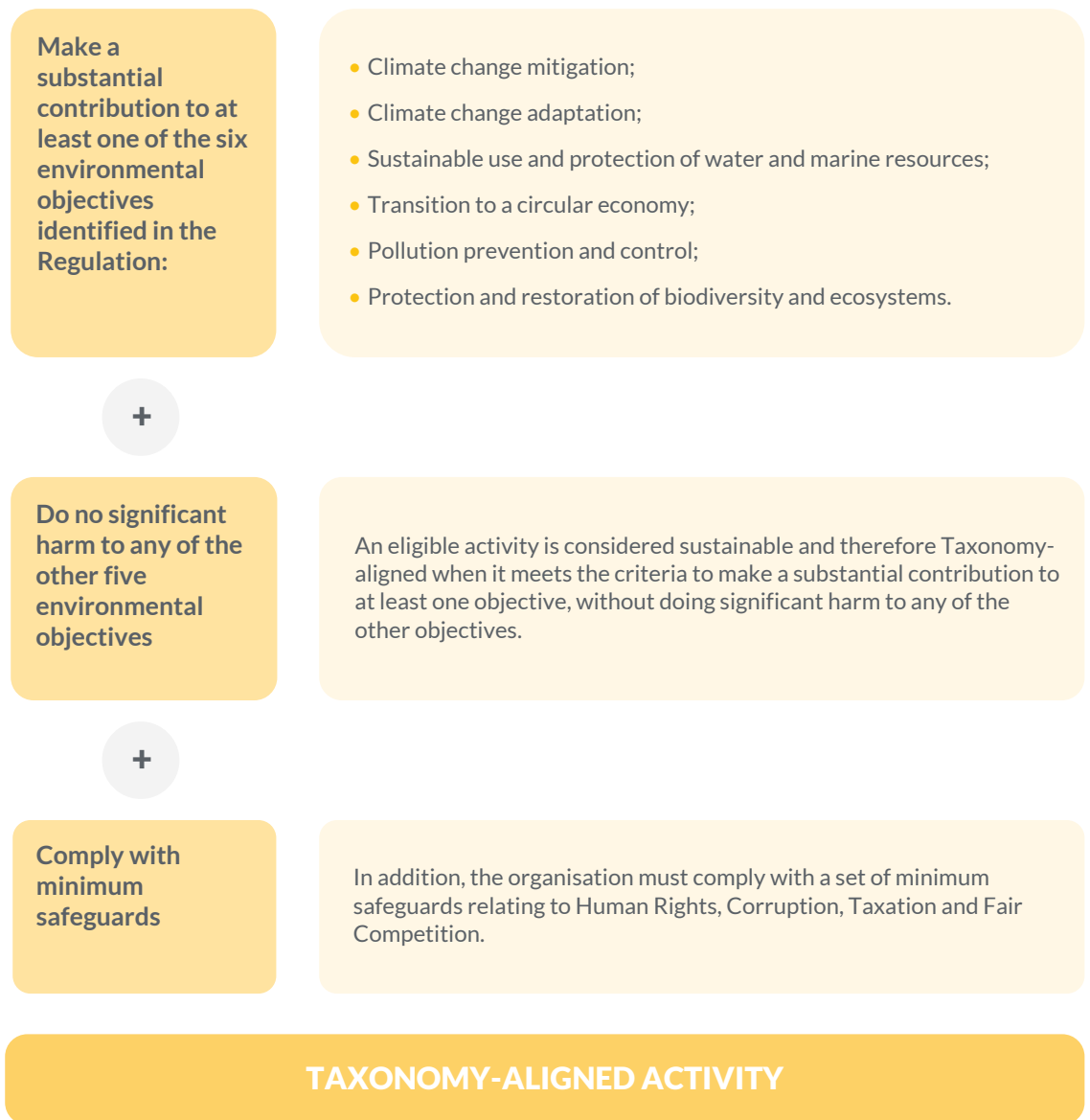


## 3.1.2. Environmental Information

### 3.1.2.1. European Taxonomy

#### 1. Context

The European Union Taxonomy, introduced by Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020, functions as a standardised and mandatory classification system to determine which economic activities are considered "environmentally sustainable" within the European Union. Its objective is to direct capital flows within the EU towards green activities. According to the Taxonomy Regulation, for an economic activity to be considered environmentally sustainable, it must:



The criteria that activities must comply with in order to be considered sustainable are defined by the Delegated Acts. In 2021, non-financial undertakings only reported their Taxonomy-eligible activities relating to the activities listed in the Climate Delegated Act. For these activities, eligibility of the economic activities was reported in terms of Turnover, Capital Expenditure (CapEx) and Operating Expenditure (OpEx).

In the 2022 financial year, in addition to the eligibility assessment, non-financial undertakings were required to assess and disclose the alignment of these activities with the application of technical screening criteria and compliance with minimum safeguards. In the 2023 financial year, the same exercise was carried out; however, the potential eligibility of the new activities introduced by the Environmental Delegated Act and the new activities under the Climate Delegated Act was also assessed. For the 2025, financial year, Secil Group reports its Taxonomy-eligible and Taxonomy-aligned activities relating to the activities listed in the Delegated Acts described above.

In 2025, Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 was published, following the amendments introduced by the Omnibus package to the EU Taxonomy. In accordance with Article 4 of this Regulation, Secil Group chose not to apply the amendments introduced by this Regulation for the 2025 financial year.

## 2. Eligibility analysis

After analysing the activities identified in the Climate Delegate Act, the Complementary Delegate Act and the Environmental Delegate Act, Secil identified only one eligible economic activity:

Currently, only a limited set of economic activities is covered by the Delegated Acts. At this initial stage, the focus is on the most carbon- and energy-intensive industries and on green energy, which is why a relevant share of Secil's activities is not yet included in the list of eligible activities. Accordingly, the production and sale activities related to white cement, ready-mix concrete, aggregates, mortars, precast concrete and hydraulic lime were excluded from the eligible activities.

ACTIVITY	3.7 - Cement production
OBJECTIVE	Climate change mitigation (CCM)
DESCRIPTION	<ul style="list-style-type: none"> <li>• The Secil Group owns seven grey cement plants: two in Portugal, one in Lebanon, one in Tunisia, two in Brazil and one in Angola. Of these seven grey cement plants, two do not produce clinker (one in Brazil and one in Angola).</li> <li>• According to the Group’s analysis, the following were excluded from the eligible activities, as they are not part of the Delegated Acts: production and sale of white cement, ready-mixed concrete, aggregates, mortars, precast concrete and hydraulic lime of the Secil Group (Cement segment).</li> </ul>

### 3. Alignment analysis

For the alignment assessment, Secil evaluated the technical screening criteria for “Substantial Contribution”, “Do No Significant Harm” and “Minimum Safeguards” in order to determine the percentage of alignment of its activities.

With regard to activity 3.7 – Manufacture of cement, this is considered eligible under the EU Taxonomy; however, it is not aligned, as it does not meet the technical screening criterion for substantial contribution to climate change mitigation, namely the threshold of specific GHG emissions below 0.722 tCO<sub>2</sub>e per tonne of grey clinker. Secil has defined a Roadmap with specific actions for all production units, aiming to achieve a level of CO<sub>2</sub> emissions reduction by 2030 that ensures alignment with the objective of limiting global warming to 1.5°C. The 2030 targets were validated by the Science Based Targets initiative (SBTi).

The technological upgrade project at the Outão production unit, the CCL – Clean Cement Line Project – an investment totalling approximately EUR 86 million, completed in 2024 and currently in the optimisation phase of the operational production process, will enable a 20% reduction in CO<sub>2</sub> emissions from the production process. At the Maceira production unit, a new project was launched, ProFuture – CCL Maceira, with a planned total investment of approximately EUR 72 million, aimed at reducing GHG emissions by around 30.3% and reducing overall energy consumption by approximately 20.8%, compared with the reference year (2019).

These projects will position these units as European benchmarks in terms of energy and environmental efficiency.

### **3.1 Substantial Contribution and Do No Significant Harm**

CS/NPS	Criteria (Non-exhaustive)	Application of Secil Group criteria
CS: Climate change mitigation	Specific GHG emissions of less than 0.722 tCO <sub>2</sub> e per ton of grey clinker	The Group considers that there is no technical alignment in each of the cement production units.
NPS: 2. Climate change adaptation	Appendix A (Physical Climate Risk Management)	Secil assessed the climate-related physical risks relevant to its operations in accordance with the TCFD framework. Currently, Secil is in Phase 3 – Financial Impact Assessment and Estimation of Financial Impact.
NPS: 3. Sustainable use and protection of water and marine resources	Appendix B (Sustainable use and protection of water and marine resources)	<ul style="list-style-type: none"> <li>• All manufacturing facilities comply with the applicable national legislation for managing the use and protection of water resources.</li> <li>• Our cement plants in Portugal feature Environmental Management Systems, certified under NP EN 14001:2015. The Lebanon plant has ISO 14001:2015 environmental certification.</li> </ul>
NPS: 4. Transition to a circular economy	N/A	N/A
NPS: 5. Pollution prevention and control	Appendix C (Pollution prevention and control); Emissions within the range of standard values; There are no environmental conflicts; Waste management	<ul style="list-style-type: none"> <li>• In the case of using hazardous waste as alternative fuels, waste reuse fulfils all the requirements in terms of occupational safety, hygiene and health required by the current legislation in force (applicable only in Portugal).</li> <li>• The industrial units monitor their emissions continuously and periodically in accordance with their respective environmental permits. Regarding the</li> </ul>
6. Protection and restoration of biodiversity and ecosystems	Appendix D (Protection and restoration of biodiversity)	<ul style="list-style-type: none"> <li>• All changes to areas affected by extractive activities are subject to an Environmental Impact Assessment (EIA), when applicable, and in accordance with the legislation in force in each country. When an EIA is required, the corresponding national legislation is followed, as well as the necessary compensation measures to protect the environment.</li> <li>• In biodiversity-sensitive areas, SECIL has implemented Biodiversity Management Plans, with the exception of one quarry.</li> </ul>

## Minimum Safeguards

To verify the alignment of eligible activities, it is necessary to comply with the Minimum Safeguards defined by the European Taxonomy Regulation, which are defined as “alignment with the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights”. The Final Report on Minimum Safeguards published by the European Commission’s Platform on Sustainable Finance identifies the four areas that companies must address to ensure compliance: Human Rights, Corruption, Taxation and Fair Competition.

## Human Rights

For Secil, ensuring compliance with the universal principles established by the United Nations on Human Rights is a priority. Secil has implemented the Secil Group Code of Conduct and, to complement it, a Human Rights Policy. It also applies a Supplier Code of Conduct, through which it requires its business partners to commit to respecting human rights. In 2025, Secil continued the assessment of its most critical suppliers against ESG (Social, Environmental and Governance) criteria through the Moody’s platform, which includes Human Rights topics.

In 2025, a review of the double materiality assessment was carried out in order to more deeply incorporate the perspective of the different geographies of Secil Group.

## Corruption, Fair Competition and Taxation

Secil does not tolerate any form of corruption, fraud, money laundering, bribery or extortion, and applies the same requirements to its suppliers, as reflected in its Supplier Code of Conduct. Secil has also implemented an Anti-Corruption Policy and an Anti-Money Laundering and Counter-Terrorist Financing Policy. In the area of Fair Competition, the Competition Law Policy was implemented, through which Secil commits to adopting good competitive practices and complying with the applicable legislation.

In tax matters, the Group has implemented a Tax Policy aimed at ensuring the full compliance of the companies within the Group with their tax obligations, through the development of an organised approach to tax risks.

In 2025, Secil carried out the training actions planned within the scope of the Code of Conduct, Human Rights, Corruption and Fair Competition.

Secil provides an Integrity Channel on its website, managed by an external and independent entity, which allows the reporting of irregularities occurring within the Group and ensures their proper analysis and remediation.

With regard to convictions, Secil confirms that it had no knowledge of any relevant cases or convictions related to Human Rights, Corruption, Taxation or Fair Competition.



## 4. Disclosure of KPIs

Below is a set of key performance indicators associated with environmentally sustainable economic activities that non-financial undertakings are required to disclose in accordance with the Taxonomy Regulation (Article 8) and the Delegated Acts: the proportion of their turnover (Turnover KPI), the proportion of their capital expenditure (CapEx KPI) and the proportion of their operating expenditure (OpEx KPI).

### Accounting Policies and Disclosure of Indicators

As defined by the Taxonomy, the reported values were calculated in accordance with Secil's Consolidated Financial Statements for the financial year ended 31 December 2025, which were prepared in accordance with the International Financial Reporting Standards (IFRS) adopted by the European Union.

The European Taxonomy requires companies to disclose how they avoided double counting when considering eligible economic activities (numerator), namely in the determination of turnover, capital expenditure and operating expenditure. Secil determined the eligible expenditure based on its financial and analytical accounting records and ensured that cost elements were considered only once in the calculation of the indicators.

### Proportion of Turnover Associated with Taxonomy-aligned Economic Activities

Turnover was based on the same accounting policies applicable to revenue in accordance with the International Financial Reporting Standards (IFRS), namely considering sales and services rendered within the scope of Secil's ordinary activities. The total turnover (denominator for the calculation of the ratio of eligible activities) therefore corresponds to the revenue reported in the Consolidated Financial Statements as at 31 December 2025.

As previously mentioned, the Manufacture of cement activity is not aligned with the Taxonomy, as can be seen in Table 1 – Turnover.

### Proportion of CapEx Associated with Taxonomy-aligned Economic Activities

The amount presented as total CapEx in the denominator of the calculation of the ratio of eligible activities corresponds to the sum of acquisitions of tangible assets, intangible assets (excluding CO<sub>2</sub> allowances) and right-of-use assets carried out in 2025, disclosed in Secil's Consolidated Financial Statements (sections 3.3, 3.2 and 3.4, respectively). For the purpose of calculating this ratio, additions to intangible assets related to the acquisition of CO<sub>2</sub> allowances were excluded, insofar as they do not effectively constitute an acquisition of allowances, but rather allowances allocated to Secil, with their classification as intangible assets resulting from the accounting policy adopted by the Group. In 2025, no additions to investment properties were recorded, as can be seen in Table 2 – CapEx.

The CapEx values classified as eligible, whether considered Taxonomy-aligned or non-aligned, correspond to investments in assets or processes associated with the respective activities, namely:

- **Cement:** The ProFuture Maceira project, aimed at eliminating the use of fossil fuels and increasing energy efficiency, thereby significantly reducing Greenhouse Gas (GHG) emissions. The “Solar Plant” Project in Lebanon, which consisted of the installation of a 10 MW photovoltaic solar plant, with the objective of increasing renewable energy generation capacity in operations and reducing CO<sub>2</sub> emissions.
- **Environment:** Investments in new production equipment with lower energy consumption or lower CO<sub>2</sub> emission levels.



## Proportion of OpEx Associated with Taxonomy-aligned Economic Activities

The total OpEx presented in the denominator of the calculation of the ratio of eligible activities corresponds to the following expenses determined based on the Consolidated Financial Statements as at 31 December 2025 (section 2):

- Non-capitalised research and development costs;
- Industrial cleaning expenses;
- Maintenance and repair expenses;
- Non-capitalised short-term lease costs (“Short Term Leases”); and
- Other expenses directly related to the maintenance of tangible assets.

The OpEx values presented in the table (numerator for the calculation of the ratio of eligible activities) correspond to the OpEx allocated to activities classified as eligible (whether Taxonomy-aligned or non-aligned). These values include OpEx such as:



**Cement:** the costs of Secil’s Innovation and Development Centre (CIND), where research and development activities are carried out for new cement products and applications, as well as innovative industrial production processes, with the aim of developing and adopting new technologies within the Group in the areas of production processes and sustainable products, in order to reduce the embedded carbon content of Secil Group solutions. Table 3 – OpEx.

## Standard Templates for Disclosure in Accordance with Delegated Act 2022/1214




In accordance with the Taxonomy Regulation, particularly the Article 8 Delegated Act, non-financial undertakings must also disclose the reporting templates associated with activities related to nuclear energy and fossil gas. Where entities do not carry out any of these activities, they are only required to publish Template 1 from this set of tables, which is the case applicable to Secil.

With regard to the use of fossil gas, Secil Group makes residual use of natural gas as a fuel in non-European geographies, representing less than 0.3% of the thermal energy consumed by the Group. In the 2025 financial year, no investments related to natural gas assets were recorded.



### Model 1: Activities related to nuclear energy and fossil gas

#### Nuclear-energy-related activities

1	 <p>The company carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.</p>	NO
2	 <p>The company carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes, such as hydrogen production, as well as their safety upgrades, using best available technologies.</p>	
3	 <p>The company carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes, such as hydrogen production from nuclear energy, as well as their safety upgrades.</p>	

#### Fossil-gas-related activities




1	 <p>The company carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.</p>	NO
2	 <p>The company carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.</p>	
3	 <p>The company carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.</p>	

Table 1 – Turnover

Financial year 2025				Substantial contribution criteria						NPS Criteria (“do no significant harm”)									
Economic Activities (1)	Code (a) (2)	Turnover (3)	Proportion of turnover, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Aligned proportion of turnover (A.1) or taxonomy-eligible (A.2), year 2023 (18)	Category – enabling activity (19)	Category – 51transitional activity (20)
		euro	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	C	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (taxonomy-aligned)</b>																			
Cement Products	MAC 3.7	18.081.725.22 €	2%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%		
sustainable activities		18.081.725.22 €	2%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	v	Y	0%		
Of which, enabling		–	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	C	
Of which, transitional		18.081.725.22 €	2%	0%						Y	Y	Y	Y	Y	Y	Y	0%		T
<b>A.2. Activities eligible under the taxonomy but not environmentally sustainable (non-taxonomy-aligned activities)</b>																			
Cement Products	MAC 3.7	445.246.409 €	59%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								63%		
environmentally sustainable		445.246.409 €	59%	59%	0%	0%	0%	0%	0%								63%		
taxonomy-eligible		463.328.134 €	62%	62%	0%	0%	0%	0%	0%								63%		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
taxonomy-non-eligible activities		287.974.364 €	38%																
Total (A + B)		751.302.498 €	100%																

Table 2 –CapEx

Financial year 2025				Substantial contribution criteria						NPS Criteria (“do no significant harm”)									Taxonomy-aligned proportion of Capex (A.1) or taxonomy-eligible (A.2), year 2023 (18)	Category – enabling activity (19)	Category – 51transitional activity (20)
Economic Activities (1)	Code (a) (2)	Capex (3)	Proportion of Capex year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)					
		euro	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	C	T		
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																					
<b>A.1. Environmentally sustainable activities (taxonomy-aligned)</b>																					
Produção de Cimento	MAC 3.7	31.756.692,70 €	32%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%				
Capex of environmentally sustainable activities (taxonomy-aligned) (A.1)		31.756.692,70 €	32%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%				
Of which, enabling		—	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	C			
Of which, transitional		31.756.692,70 €	32%	0%						Y	Y	Y	Y	Y	Y	Y	0%		T		
<b>A.2. Activities eligible under the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy)</b>																					

Cement Production	MAC 3.7	46.302.346 €	46%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									76%		
Capex of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned) (A.2)		46.302.346 €	46%	46%	0%	0%	0%	0%	0%									76%		
A. Capex of taxonomy eligible activities (A.1+A.2)		78.059.039 €	77%	77%	0%	0%	0%	0%	0%									76%		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
Capex of taxonomy-noneligible activities (B)		22.670.891 €	23%																	
Total (A + B)		100.729.929 €	100%																	

Table 3 –OpEx

Financial year 2025				Substantial contribution criteria						NPS Criteria (“do no significant harm”)									
Economic Activities (1)	Code (a) (2)	Opex (3)	Proportion of Opex, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned proportion of Opex (A.1) or taxonomy-eligible (A.2), year 2023 (18)	Category – enabling activity (19)	Category – transitional activity (20)
		euro	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	C	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (taxonomy-aligned)</b>																			
Produção de Cimento	MAC 3.7	1.594.372,18 €	2%	0%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	0%		
Opex of environmentally sustainable activities (taxonomy-aligned) (A.1)		1.594.372,18 €	2%	0%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	0%		
Of which, enabling		–	0	0%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	0%	C	
Of which, transitional		1.594.372,18 €	2%	0%						S	S	S	S	S	S	S	0%		T
<b>A.2. Activities eligible under the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy)</b>																			
Cement Production	MAC 3.7	1.594.372,18 €	2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										

Opex of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned) (A.2)	38.703.029 €	51%	51%	0%	0%	0%	0%	0%										
A. Opex of taxonomy-eligible activities (A.1+A.2)	40.297.401 €	53%	53%	0%	0%	0%	0%	0%										
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																		
Opex of taxonomy-non-eligible activities (B)	36.157.945 €	47%																
Total (A + B)	76.455.346 €	100%																

**MAC:** Climate change mitigation

**Y:** Yes, taxonomy-eligible activity and aligned with the taxonomy regarding the relevant environmental objective.

**N:** No, taxonomy-eligible activity but not aligned with the taxonomy regarding the relevant environmental objective.

**N/EL:** Not eligible, activity not eligible for the taxonomy regarding the relevant environmental objective.



## 5. Next steps in the implementation of the EU Taxonomy

As part of Secil's strategy and sustainability objectives, efforts are being made to ensure the continuous alignment with the EU Taxonomy, including the development of the following activities:

- Continued application of the TCFD (Task Force on Climate-related Financial Disclosures) framework to support Secil in the management and disclosure of climate-related risks and opportunities.
- Continued implementation of sustainability-related projects, particularly the Decarbonisation Roadmap. Following the CCL Outão project, the ProFuture Maceira project represents a new milestone in Secil's journey towards the decarbonisation of cement production.
- Monitoring of potential updates to the Taxonomy Regulation by the European Commission, resulting from the Omnibus legislative package.

### 3.1.2.2. ESRS E1 – Climate Change

#### STRATEGY

#### SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with strategy and business model

Descriptive	Impact, Risk or Opportunity	Time horizon	Position in the value chain	Related sub-topic or sub-sub-topic
[ESRS2.48a]	[ESRS2.48a]	[ESRS2.48ciii]	[ESRS2.48a]	
Develop initiatives with our stakeholders to adapt to climate change	Positive impact	-	Downstream	Climate change adaptation
Greenhouse gas emission (scopes 1, 2 and 3)	Negative impact	-	Upstream, own operations and downstream	Climate change mitigation
CO <sub>2</sub> capture and storage	Positive impact	Long-Term	Own operations	Climate change mitigation
Energy consumption from non-renewable sources	Negative impact	-	Upstream and own operations	Energy
Climate change can lead to potential disruption of the supply chain, and the consequent impact on the availability and quality of raw materials can compromise the Group's activities.	Risk	Long-Term	Upstream	Climate change adaptation
Failure to execute climate change adaptation measures can affect the value chain, for example, interrupting the delivery of products and services to customers.	Risk	Long-Term	Downstream	Climate change adaptation
The transition to more sustainable technology can, in the long term, lead to significant improvements in operational efficiency and reduce global operating costs, improve profitability and/or gain additional market share.	Opportunity	Long-Term	Own operations	Climate change mitigation
Replace fossil fuels with renewable fuels (e.g. biomass, solar and hydrogen)	Opportunity	Medium-Term	Own operations	Climate change mitigation
Rising carbon price and reduction in the availability of EU ETS allowances.	Risk	Medium-Term	Own operations	Climate change mitigation

Note: The material impacts identified are actual, and therefore do not have an associated time horizon.

In relation to climate change adaptation, Secil initiated, in 2024, the process of identifying climate-related risks and opportunities in line with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), with the objective of assessing potential physical and transition climate risks and developing appropriate adaptation strategies [E1.SBM-3]. In 2025, the project progressed to Phase 3 (Financial Impact Assessment and Quantification), through the implementation of a pilot project aimed at quantifying the financial impacts of the climate risks identified in the previous phases.



## IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

### E1-1 - Transition plan for climate change mitigation

#### "Secil's Path to Decarbonization" Roadmap

Secil has defined its decarbonisation roadmap – the “Secil's Path to Decarbonisation” – based on the Cembureau 5C<sup>5</sup> methodology [E1.14]. This roadmap guides the transformation of its cement plants towards a low-emissions future, establishing clear targets for 2030 and committing to achieving climate neutrality by 2050 [E1.16b | E1.16h]. The roadmap covers all geographies in which Secil operates and was approved by the Executive Committee [E1.16i].

The targets set for 2030 are aligned with a 1.5°C trajectory and were validated in 2024 by the Science Based Targets initiative (SBTi), reinforcing the ambition and credibility of this commitment [E1.16a]. To deliver on this ambition, the roadmap is based on the implementation of a structured set of actions (Section 3.1.2.2), supported by an internal investment plan until 2050 [E1.16b | E1.16e | E1.16h].

This plan is structured in two phases: an initial phase up to 2030, focused on emissions reduction and the initiation of a progressive industrial transformation process, and a second phase between 2030 and 2050, aimed at the assessment and deployment of new decarbonisation technologies [E1.16b | E1.16c].

In the first phase, the focus is on reducing CO<sub>2</sub> emissions from clinker and cement using traditional levers outlined below [E1.16b]:

#### Production process efficiency

Secil focuses on the modernisation of its facilities by incorporating more efficient and proven technologies, with the capacity to reduce thermal energy consumption and increase the use of alternative fuels<sup>6</sup> with neutral CO<sub>2</sub> content, while also integrating green hydrogen. In this context, the development of the Clean Cement Line (CCL) project marked Secil's first major milestone in its decarbonisation pathway at the SECIL-Outão plant in Portugal and represents a key element of the industrial transformation underway [E1.16j].

In addition, for the period 2030 to 2050, Secil is assessing available and emerging technologies in order to select those with the highest potential for deployment across its plants. Among the solutions under consideration is the utilisation of captured CO<sub>2</sub>, either through the forced carbonation of its materials or for the production of efuels. At the same time, the company is identifying the infrastructure required to ensure the safe use or storage of this CO<sub>2</sub>, including the option of geological storage [E1.16j].

<sup>5</sup> 5Cs- Clinker, Cement, Concrete, Re(Carbonation) and Construction

<sup>6</sup> Alternative fuels (AF) - Any industrial waste resulting from a production process that, due to its physical and chemical characteristics and calorific value, can be used as a fuel, thereby replacing the use of fossil fuels.

## Product portfolio and raw materials adaptation

In parallel, the use of decarbonated raw materials in clinker production is being promoted, as well as alternative raw materials with pozzolanic properties, which enable the reduction of the clinker content in cement. Reducing the clinker factor contributes not only to lowering CO<sub>2</sub> emissions, but also to the valorisation of resources with a lower carbon footprint.

## Energy transition and decarbonisation of energy consumption

Secil assesses the potential for emission reductions associated with electricity consumption, taking into account the specific characteristics of each geography. In this context, the use of electricity from renewable sources is planned in certain facilities, namely through the installation of solar panel systems. Additionally, the operation of a proprietary electricity generation unit is envisaged, based on a fuel mix with a more favourable GHG emissions profile than the external electricity grid. This will contribute to a gradual reduction of emissions related to Secil's electricity consumption.

## Action throughout the value chain

In addition, Secil has committed to reducing gross GHG emissions associated with purchased clinker and cement by 25.3% per tonne of clinker and cement, respectively, by 2030 [E1.16b]. This commitment reinforces the company's integrated approach to decarbonising its value chain, extending its actions beyond direct operations and progressively reducing scope 3 emissions.

By 2040, Secil plans to invest more than €150 million in decarbonisation projects, focusing on the traditional levers described above [E1.16f]. This investment includes increasing the use of alternative fuels and raw materials<sup>7</sup>, the development of low-carbon clinker (Low Carbon Clinker), the reduction of the clinker factor, and the implementation of thermal energy efficiency measures [E1.16c].

Secil is not excluded from the EU Paris-aligned benchmarks, and its economic activities fall within the scope of the European Union Taxonomy Regulation [E1.16g]. According to its internal plan, the company expects to achieve 57% alignment by 2030, reinforcing its transition pathway towards a more sustainable economy [E1.16e].

## E1-2 – Policies related to climate change mitigation and adaptation

Secil adopts policies related to climate change mitigation, namely the **Sustainability Policy** and the **Quality, Environment, Health and Safety Policies**<sup>8</sup>, implemented across the different geographies [E1.24]. These policies aim to reduce emissions in operations through increased efficiency, process optimisation, and the use and promotion of alternative raw materials and fuels [E1.25a | E1.25e].

In the case of the Quality, Environment, Health and Safety Policies, the participation of a broad range of stakeholders in each geography was considered, namely direct and indirect employees, customers, suppliers, business partners, service providers and local communities [ESRS 2.65e].

<sup>7</sup>Alternative raw materials – Raw materials derived from non-primary sources (waste, secondary materials, by-products or co-products).

<sup>8</sup>Quality, Environment, Energy, Health and Safety Policy in Portugal

## Policies

Document	Quality, Environment, Health and Safety Policies*
<b>Key contents and objectives</b> [ESRS 2.65d   ESRS 2.65a   E1.25]	Secil frames the sustainable development of its activities through these Policies, committing to continuously improve the performance of its reference frameworks in order to meet the expectations of all stakeholders in relation to its operations.  Environmental Responsibility and Protection is one of the topics addressed in these Policies, under which Secil commits to: <ul style="list-style-type: none"> <li>● Mitigating the impacts of its operations through the adoption of best available technologies and practices, as well as the appropriate training of its employees; and</li> <li>● Reducing the carbon impact of its activities, namely through the promotion of the use of secondary raw materials and alternative fuels.</li> </ul>
<b>Scope</b> [ESRS 2.65b]	Own operations and value chain. Covers all geographies of the Secil Group.
<b>Highest level responsible for implementation</b> [ESRS 2.65c]	Board of Directors and Sustainability and Management System Coordinator
<b>Third-party standards or initiatives to which the company commits</b> [ESRS 2.65d]	ISO14001; ISO 9001; ISO 18001; ISO 50001; EMAS**
<b>Availability</b> [ESRS 2.65 f]	Intranet and Secil website

\*Quality, Environment, Energy, Health and Safety Policy in Portugal  
 \*\*ISO 50001 and EMAS apply only to the Portugal geography

The following information is incorporated by reference to other sections of the Non-Financial Information Statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Sustainability Policy – Chap. 3.1.4.1.

## ACTIONS AND RESOURCES

### E1-3 - Actions and resources related to climate change policies

#### Actions

Key actions	Status	Scope of action	Time horizon	Outcomes / Expected effects
<b>[ESRS 2.68a   E1.26]</b>	<b>[ESRS 2.68e]</b>	<b>[ESRS 2.68b]</b>	<b>[ESRS 68c]</b>	<b>[ESRS 2.68a   ESRS 2.68e]</b>
Energy optimisation in raw materials transport	Completed	Lebanon	Short-term	Replacement of the pneumatic transport system from the raw vertical mill to the homogenisation silo, responsible for feeding the kiln and cement mills in the storage silos, with a mechanical transport system, which is more efficient and has lower electricity consumption.
Installation of a 10 MW solar photovoltaic plant	Completed	Lebanon	Short-term	Increase renewable energy generation capacity in operations and reduce CO <sub>2</sub> emissions.
Increased use of alternative fuels: Expansion of storage capacity and analysis of alternative fuels	In progress	Brazil	Short-term	Expansion of storage infrastructure through the construction of a new warehouse for alternative fuels, enabling an increase in the fuel substitution rate to 40%. Additionally, a new local laboratory was installed to accelerate the analysis of received loads.
Profuture Project – Secil Maceira-Liz	In progress	Portugal (Maceira)	Medium-term	Increase energy efficiency, eliminate fossil fuel consumption with a consequent reduction in CO <sub>2</sub> emissions in clinker production, through the integration of clean energy use, the development of low-carbon clinker, and the digitalisation of the production process.
Monitoring of results from the Clean Cement Line Project	In progress	Portugal (Outão)	Short-term	Optimisation of the production operational process.
Drying and processing of cementitious materials	Planned	Portugal (Outão and Maceira)	Short-term	Project aimed at equipping plants with adequate infrastructure to process and dry large volumes of cementitious materials, with the objective of reducing clinker incorporation in cement production.

Secil has been consistently developing a set of measures and initiatives aimed at reducing its carbon footprint in its operations and generating a positive impact throughout the value chain. The adoption of these actions is expected to enable the achievement of the established targets (Chap. 3.1.2.2, E1-4) [ESRS 2.68a | E1.28]. The decision to implement each action is preceded by a rigorous assessment of its technical and economic feasibility, as well as the availability of financial resources to ensure its execution. This process also includes the analysis of the local context and the applicable regulatory framework, ensuring a responsible, robust and context-specific approach [AR21].

Both implemented and planned actions contribute to the achievement of Secil's objectives and targets. The targets validated by the SBTi are aligned with a 1.5°C trajectory and reflect international commitments such as the Paris Agreement and the European Green Deal [ESRS 2.68a | E1.29b]. These initiatives are aligned with the main decarbonisation levers and are integrated into the roadmap towards carbon neutrality, ensuring a consistent and progressive approach to the climate transition (Chap. 3.1.2.2, E1-1) [E1.29a].

Environmental investments are generally financed through green instruments, as was the case for the Outão Clean Cement Line (CCL) project and, more recently, the Profuture Project at Maceira, through the issuance of green bonds (€75 million and up to €72 million, respectively) [ESRS 2.69a]. In total, sustainable financing instruments (Green Bonds, Sustainability-Linked Bonds and Sustainability-Linked Loans) accounted for 74% of the total financing lines contracted by the Secil Group at the end of 2025. The Group has several financing instruments linked to key performance indicators (KPIs) and sustainability targets, including the reduction of CO<sub>2</sub> emissions across three geographies in which it operates: Portugal, Brazil and Tunisia.

The project with the highest investment in CapEx and OpEx was the Clean Cement Line (CCL) – Outão, amounting to approximately €86 million [ESRS 2.69b]. The project with the highest planned investment is the Profuture Project – Secil Maceira-Liz, with an estimated total investment of approximately €72 million [ESRS 2.69c].

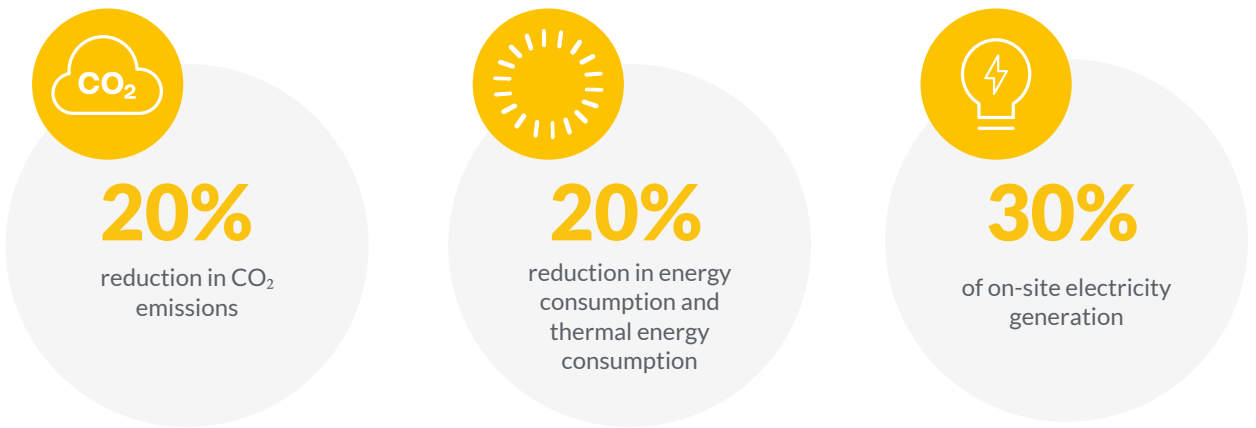



### Clean Cement Line (CCL) Secil Outão

The CCL Project, Secil's first major decarbonisation project, recognised as a Project of National Interest (PIN), was the largest initiative under the Portugal 2020 programme in the field of research and technological development, integrating both mature and innovative technologies. A total of 9 patents were registered throughout the project.

The CCL Project consisted of a technological upgrade of the Outão production unit and is currently in the phase of optimisation of the production operational process.

This project comprises four R&D subprojects aimed at eliminating dependence on fossil fuels, increasing energy efficiency, enabling on-site electricity generation, integrating digitalisation into the process, and reducing CO<sub>2</sub> emissions.





### Subprojects

<p><b>Zero Fossil Fuel</b></p> <ul style="list-style-type: none"> <li>• Precalciner;</li> <li>• Energreen;</li> <li>• Digitalisation.</li> </ul>	<p><b>Low Carbon Clinker</b></p> <p>Grate cooler, Low Carbon Clinker.</p>	<p><b>Combustion Boost</b></p> <p>Pulsed continuous combustion with hydrogen.</p>	<p><b>Sun2dry</b></p> <p><i>Waste Heat Recovery</i> hybrid waste heat recovery with solar thermal concentration and alternative fuels drying.</p>
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## Results

The Outão plant reduced specific emissions by 11% per tonne of clinker compared to the project baseline (Scope 1). The CCL Project – the modernisation of Kiln 9 at the Outão plant – has as its main objective the reduction of Scope 1 emissions. This project was supported by four R&D subprojects aimed at eliminating dependence on fossil fuels, improving energy efficiency, enabling on-site electricity generation, integrating digitalisation into processes, and reducing CO<sub>2</sub> emissions.

The negative deviation from the project's CO<sub>2</sub> emissions target was mainly driven by the performance of the subprojects, particularly the alternative fuels substitution rate and the kiln design. The plant is currently carrying out studies to overcome these challenges and achieve an 80% substitution rate. In 2025, the cumulative rate reached 46.4% (energy).

The Low Carbon Clinker subproject reached 6.3% in 2025, and the plant is working to increase this value to 15%. Efforts are also ongoing to stabilise kiln operation and reduce specific heat consumption.

The plant has also advanced with energy generation through the WHR (Waste Heat Recovery) system, with current production of approximately 4 MWh.

## Profuture (CCL) Secil Maceira-Liz

Following the CCL Outão Project, the ProFuture Maceira Project represents a new milestone in Secil's journey towards the decarbonisation of cement production, reinforcing its commitment to carbon neutrality and to the sustainable transformation of the cement sector. This project is being implemented at the Maceira-Liz plant, in Leiria, and aims to eliminate the use of fossil fuels and increase energy efficiency, significantly reducing greenhouse gas (GHG) emissions.

The project promotes the use of clean energy, the development of low-carbon clinker, and the digitalisation of the production line, incorporating innovative sensing and monitoring systems for optimised real-time control.

Classified as a Project of Potential National Interest (PIN), ProFuture represents a total investment of €69.1 million, of which €62.9 million is co-financed through a non-repayable grant of €25.6 million under the Recovery and Resilience Plan (RRP).



The main technical objectives of the project include:



- Elimination of fossil fuel consumption through the use of up to 90% alternative fuels and 10% green hydrogen;
- Optimisation of energy consumption, with an estimated reduction of 20% compared to the reference year (2019);
- Overall reduction of CO<sub>2</sub> emissions of approximately 30% compared to the reference year (2019).

The project integrates five interdependent technological measures, aligned with the Best Available Techniques (BAT) for the cement sector:

- Installation of a new high-flexibility calciner;
- Redesign of the preheater, improving cyclone efficiency;
- Upgrade of the clinker cooler with waste heat recovery, associated with the production of low-carbon clinker (Secil patent PT108290);
- Installation of a waste heat dryer for alternative fuels;
- Adaptation of the combustion system for green hydrogen.

#### Key development in 2025:

In 2025, the project recorded significant progress, with the following key milestones:

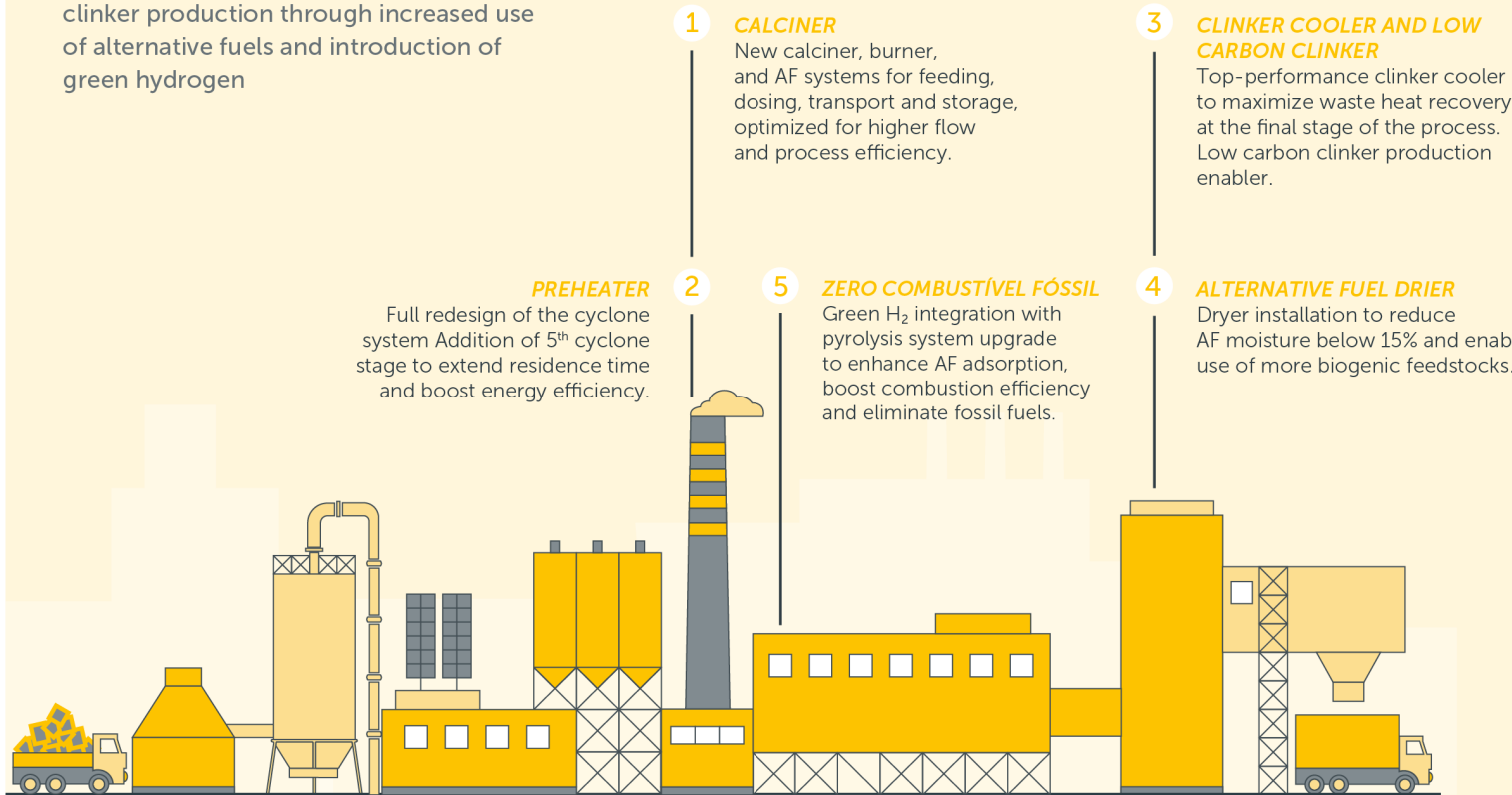
- Signing of the contract with the main supplier on 9 January 2025;
- Engineering phase reaching an execution rate of 82% in December 2025;
- Procurement and equipment manufacturing activities reaching an execution rate of approximately 69.5%;
- Overall project progress reaching 45% by the end of the year.



## SECIL – MACEIRA-LIZ PLANT

### Profuture (CCL Project)

Line 6 conversion towards fossil-free clinker production through increased use of alternative fuels and introduction of green hydrogen



**1 CALCINER**  
New calciner, burner, and AF systems for feeding, dosing, transport and storage, optimized for higher flow and process efficiency.

**3 CLINKER COOLER AND LOW CARBON CLINKER**  
Top-performance clinker cooler to maximize waste heat recovery at the final stage of the process. Low carbon clinker production enabler.

**2 PREHEATER**  
Full redesign of the cyclone system Addition of 5<sup>th</sup> cyclone stage to extend residence time and boost energy efficiency.

**5 ZERO COMBUSTÍVEL FÓSSIL**  
Green H<sub>2</sub> integration with pyrolysis system upgrade to enhance AF adsorption, boost combustion efficiency and eliminate fossil fuels.

**4 ALTERNATIVE FUEL DRIER**  
Dryer installation to reduce AF moisture below 15% and enable use of more biogenic feedstocks.

### Global Benefits



**Zero**

Fossil Fuel (90% Alternative Fuels + 10% Green H<sub>2</sub>)



**30%**

CO<sub>2</sub> Emission Reduction  
30.3% reduction



**20%**

Energy Efficiency  
20.8% energy use reduction

## METRICS AND TARGETS

### E1-4 - Targets related to climate change mitigation and adaptation

Secil's near-term decarbonisation targets have been approved by the Science Based Targets initiative (SBTi) [ESRS 2.80g | E1.34e].

These targets are aligned with the commitments established in Secil's Sustainability Policy and Quality, Environment, Health and Safety Policies, and are implemented through actions focused on emissions reduction, supported by the strategic decarbonisation levers [ESRS 2.80a | E1.34f]. The targets constitute an essential instrument for managing the identified material negative impacts under the climate change mitigation sub-topic ([Chap. 3.1.1.3, SBM-3](#)), providing a structured approach to reducing emissions both in Secil's own operations and across its value chain [E1.33].

Secil's roadmap has been verified and aligned with the scientific criteria of the SBTi, namely with the specific requirements and guidance for the cement sector applicable to near-term targets. Within this framework, the targets defined for 2030, relating to Scope 1 and Scope 2, have been classified as aligned with a 1.5°C trajectory, the most ambitious limit set out in the Paris Agreement [AR26 | ESRS 2.80g | E1.34e].

The table below presents the target defined by Secil related to climate change mitigation.

#### Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	Performance 2024	Performance 2025	Target for 2030
[ESRS 2.80b   E1.32]	[ESRS 2.80d   E1.34c]	[ESRS 2.75   ESRS 2.80b   E1.34a]	[ESRS 2.80j]	[ESRS 2.80j]	[ESRS 2.80b   ESRS 2.80e   E1.34d]
Reduce gross Scope 1 and Scope 2 emissions per tonne of cement by 30.4%.	781 Base year: 2020	Gross Scope 1 and Scope 2 emissions (kg CO <sub>2</sub> /t cement)	693	680	544

Note 1: The target boundary includes emissions and removals in the land use category associated with bioenergy raw materials.

Note 2: The boundary includes the plants in Outão, Maceira, Adrianópolis, Pomerode, Gabès and Sibline.

Note 3: The 2024 and 2025 performance and the 2030 target only consider CO<sub>2</sub> emissions. The baseline includes CO<sub>2</sub> and other GHGs.

Note 4: A market-based approach was considered for Scope 2 values.

Note 5: Secil's roadmap was verified and aligned with the scientific criteria of the SBTi, classifying the 2030 target for Scope 1 and Scope 2 as aligned with a 1.5°C trajectory, the most ambitious limit set out in the Paris Agreement [ESRS 2.80i | AR25b].



Secil is committed to reducing gross Scope 1 and Scope 2 GHG emissions by 30.4% per tonne of cement by 2030, compared to the base year 2020. The company also commits to reducing gross Scope 3 GHG emissions from purchased goods and services by 25.3% per tonne of clinker and cement within the same timeframe<sup>9</sup> [E1.34a | E1.34b | AR23].

In specific terms, Secil aims to achieve emissions of 544 kg CO<sub>2</sub>/t of cement by 2030, compared to 781 kg CO<sub>2</sub>/t of cement in the reference year 2020, for Scope 1 and Scope 2. The 2030 target covers 98.7% of the emissions from the company's own operations (Scope 1 and Scope 2). A reduction of 28% in Scope 1 emissions and 80% in Scope 2 emissions is targeted [E1.34b | AR24]. The boundary of the reduction target does not diverge from that of the emissions reported under E1-6 [E1.34b].

The formalisation of this commitment involved internal stakeholders, including the managers in each geography directly involved in the topic of CO<sub>2</sub> emissions, senior management, and the consultants who supported the target validation process [ESRS 2.80h].

The emission reduction target was defined based on the mitigation potential of each action included in the roadmap and was adapted to each cement operation, taking into account the respective local context and the projects implemented or planned in each geography [ESRS 2.80f | E1.34e]. To define the target, cement production projections associated with estimated sales for 2030 were considered, based on the expected market development in the different regions where Secil operates. This development varies by geography, with stability expected in Europe, moderate growth in Tunisia and Lebanon, and stronger growth in Brazil [E1.34e].

## E1-5 – Energy consumption and energy mix

Energy and energy efficiency are key topics in the cement industry due to their significant impact on operating costs, competitiveness, environmental sustainability – through their effect on GHG emissions and other pollutants – and legal and regulatory compliance. Despite the challenges associated with the implementation of energy efficiency measures, the opportunities for cost reduction, emissions reduction and the promotion of innovation justify the efforts undertaken.

In this context, Secil has been investing in increasing the share of energy from renewable sources, expanding the use of alternative fuels, and improving the energy efficiency of its plants.

With regard to energy consumption (thermal and electricity), in 2025, a total of 5 496 458.3 MWh was consumed, representing an increase of approximately 16% compared to 2024 (4 718 093.5 MWh), mainly due to the increase in clinker and cement production.

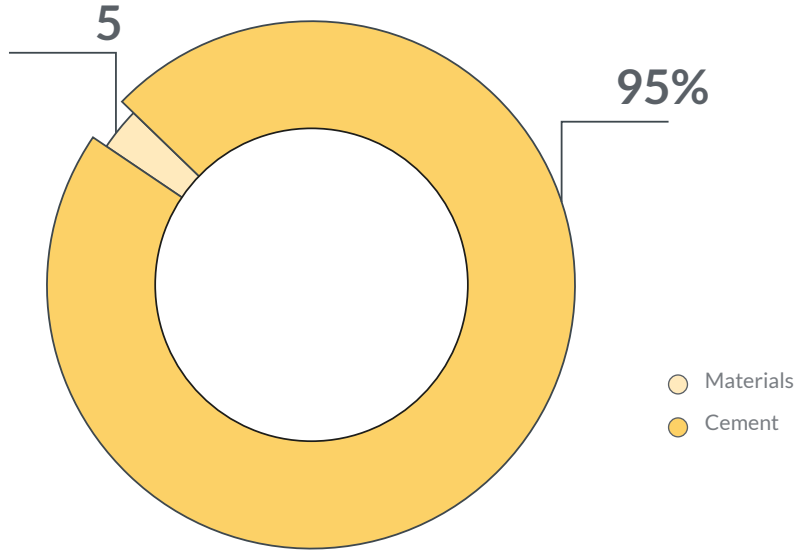
Regarding thermal energy consumption for clinker production in Portugal, projects such as the CCL at Outão enabled a reduction in specific thermal consumption of approximately 5% compared to 2024. Non-renewable energy sources continue to be the main source of energy in Secil's operations. In 2025, the distribution of energy consumption in Secil's operations was composed of 85.4% fossil sources, 14% renewable sources and 0.6% nuclear sources [E1.34f]. It should be noted that, in terms of energy consumption by business area, the cement business accounts for the largest share, representing approximately 95% of total energy consumption.

In terms of energy production, Secil generated non-fuel renewable energy, totalling 3 599.4 MWh in 2025 [E1.39], an increase of 43% compared to 2024 (2 522.3 MWh), as well as 12,882 MWh of non-fuel non-renewable energy through Waste Heat Recovery at Outão. The renewable energy produced represents less than 1% of Secil's total energy consumption. In terms of energy intensity, in 2025 Secil recorded 0.007 MWh/€ of net revenue [E1.41]. The table below presents the energy consumption in operations controlled by Secil.

<sup>9</sup> The target boundary includes emissions and removals in the land use category associated with bioenergy raw materials.



**ENERGY CONSUMPTION**  
(per business area 2025)



**Energy mix**

Energy consumption related to own operations	2025	2024
[E1.37   E1.38]		
Values in MWh		
Fuel consumption from coal and coal products	409 235.8	192 801.6
Fuel consumption from crude oil and petroleum products	3 246 205.7	2 935 174.2
Energy consumption from natural gas	13 801.8	16 636.7
Fuel consumption from other fossil sources	719 205.3	640 424.5
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	306 151.9	260 272.3
<b>Total energy consumption from fossil sources</b>	<b>4 694 600.5</b>	<b>4 045 309.3</b>
<b>Total energy consumption from nuclear sources</b>	<b>33 828.3</b>	<b>25 654.1</b>
Fuel consumption from renewable sources, including biomass	480 011.3	356 436.6
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources	284 418.8	288 171.2
Consumption of self-generated non-fuel renewable energy	3 599.4	2 522.3
<b>Total renewable energy consumption</b>	<b>768 029.5</b>	<b>647 130.1</b>
<b>Total energy consumption</b>	<b>5 496 458.3</b>	<b>4 718 093.5</b>

Note 1: Energy consumption at the Madeira Cimentos, Madeira Agregados and Madeira Betão facilities (Portugal) in December 2024 was estimated based

on the consumption registered in the same period in 2023.

Note 2: Energy consumption from nuclear sources only regards operations in Portugal and Terneuzen (Netherlands).



## E1-6 – Gross Scope 1, 2, 3 and total GHG emissions

Cement production contributes to global greenhouse gas (GHG) emissions, particularly carbon dioxide (CO<sub>2</sub>), mainly resulting from limestone calcination in the manufacturing process and fuel combustion. At the same time, the production process also generates other atmospheric pollutants, with significant impacts on air quality and potential adverse effects on human health. In this context, according to the Global Cement and Concrete Association (GCCA), cement production accounts for approximately 7% of global CO<sub>2</sub> emissions to the atmosphere, highlighting the sector's relevance in the global climate challenge.

In 2025, Secil's total carbon footprint was calculated, covering all business areas, with the main objective of quantifying Scope 1, Scope 2 and Scope 3 GHG emissions (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O and others). The carbon footprint calculation was carried out in accordance with the operational control approach, under which Secil accounts for 100% of the GHG emissions from operations over which it has full authority to introduce and implement operational policies. In operations where it holds a stake but does not exercise operational control, emissions are considered and accounted for under Scope 3.

Scope 1 emissions were the most significant, representing 72% of total emissions, followed by Scope 3 emissions at 26%, with the most significant categories being purchased goods and services (C1), fuel- and energy-related activities (C3), and downstream transportation (C9) [AR39b | AR46d | AR46i]. Within Scope 3, categories 8, 13 and 14 are not applicable to Secil's activities. Category 11 was not included in the calculation due to the high estimation uncertainty; however, the associated emissions are expected to be marginal [AR46i].

It should also be noted that Secil is covered by the European Union Emissions Trading System (EU ETS), namely the cement and lime facilities in Portugal.

Secil's gross Scope 1 emissions in 2025, amounted to 3 661 677-tCO<sub>2</sub> from fossil sources and 127 082 tCO<sub>2</sub> from biogenic sources [E1.44a | E1.50a]. Emissions from fossil sources include 1,154,245 tCO<sub>2</sub> covered by the EU ETS, representing 32% of the total in 2025 [E1.44a | E1.48b | E1.50b].

With regard to Scope 2 emissions, in 2025 Secil emitted a total of 162 204 tCO<sub>2</sub> under the location-based approach and 120 219 tCO<sub>2</sub> under the market-based approach [E1.44b | E1.49 | E1.52]. During the period under analysis, 27 030 tCO<sub>2</sub> were recorded, resulting from the combustion and biodegradation of biomass.

Secil is a member of the GCCA and applies its "Cement CO<sub>2</sub> and Energy Protocol", developed specifically for the cement sector, to calculate its Scope 1 and Scope 2 emissions. These calculations are validated annually by an external and independent entity [AR39b | ESRS 2.77b | ESRS 2.77a].

The emission factors used to calculate Scope 1 emissions are based on the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 3 – Industrial Processes and Product Use, ensuring alignment with international best practices [AR39b | AR43b].

For Scope 2 emissions, both approaches were applied: the location-based approach, using emission factors from the International Energy Agency (IEA), and the market-based approach, using emission factors provided by the respective electricity supplier [AR45d]. Whenever these factors were not available, namely in Lobito, location-based emission factors were used as an alternative to calculate market-based emissions [AR39b].

For Scope 3, the calculation methodology is based on the application of emission factors and the company's activity data, enabling a consistent and comprehensive estimation of emissions across the value chain [AR39b | AR46a].

The GHGs considered are those listed in the Kyoto Protocol, including carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF<sub>6</sub>) [AR39b | AR39c]. To quantify the emissions of each GHG, the respective Global Warming Potential (GWP) is applied, enabling the conversion of values into carbon dioxide equivalent (CO<sub>2</sub>e), the unit that consolidates and expresses total GHG emissions in a comparable manner. The calculation methodology used considers the GWP values defined in the IPCC Fifth Assessment Report (AR5), in line with the recommendations of the Greenhouse Gas (GHG) Protocol. The use of AR5 GWP values also ensures alignment with the national benchmark published by the Portuguese Environment Agency (APA) (National Inventory Report - NIR) [AR39b].

In terms of emissions intensity, in 2025 Secil recorded 0.007 tCO<sub>2</sub>/€<sup>10</sup> of net revenue based on the location-based approach and 0.007 tCO<sub>2</sub>/€ based on the market-based approach [E1.53 | E1.54].

<sup>10</sup> The net revenue value used for the calculation can be found in Note 2.1 of the annex to the consolidated financial statements.



	Retrospective				Milestones and target years		
	2020	2024	2025	% (N/ N-1)	2030	2050	Annual % target / Base year
	(Base year)	(N-1)	(N)				
Emissions (tCO <sub>2</sub> )							
<b>Scope 1</b>							
Gross scope 1 emissions - fossil (tCO <sub>2</sub> )	3 642 864.0	3 299 340	3 661 67	111.0 %	*	-	-
Scope 1 emissions from regulated emission trading schemes (%)	38 %	42 %	32 %	-	-	-	-
<b>Scope 2</b>							
Gross location-based scope 2 emissions (tCO <sub>2</sub> )	163 490.7	147 337.3	162 203.	110.1 %	-	-	-
Gross market-based scope 2 emissions (tCO <sub>2</sub> )	185 371.8	136 041.2	120 219.	88.4 %	*	-	-
<b>Scope 3</b>							
Category 1 - Purchased goods and services (tCO <sub>2</sub> )	559 203.9	827 973.0	494 239.	59.7 %	-	-	-
Category 2 - Capital goods (tCO <sub>2</sub> )	10 804.5	21 747.9	22 615.3	104.0 %	-	-	-
Category 3 - Fuel and energy-related activities (tCO <sub>2</sub> )	408 417.0	410 135.6	440 834.	107.5 %	-	-	-
Category 4 - Upstream transportation and distribution (tCO <sub>2</sub> )	62 050.5	62 002.0	69 336.4	111.8 %	-	-	-
Category 5 - Waste generated in operations (tCO <sub>2</sub> )	1 476.6	546.2	355.7	65.1 %	-	-	-
Category 6 - Business travels (tCO <sub>2</sub> )	199.5	1 392.3	2 654.0	190.6 %	-	-	-
Category 7 - Employee commuting (tCO <sub>2</sub> )	5 729.8	4 520.8	3 621.4	80.1 %	-	-	-
Category 9 - Downstream transportation and distribution (tCO <sub>2</sub> )	196 762.6	180 929.4	181 880.	100.5 %	-	-	-
Category 10 - Processing of sold products (tCO <sub>2</sub> )	27 618.6	17 901.7	21 350.2	119.3 %	-	-	-
Category 12 - End-of-life treatment of sold products (tCO <sub>2</sub> )	19 272.6	13 256.2	12 412.8	93.6 %	-	-	-
Category 15 - Financial investments (tCO <sub>2</sub> )	10 593.1	17 423.8	20 495.4	117.6 %	-	-	-
Total gross scope 3 emissions (tCO <sub>2</sub> )	<b>1 302 129.8</b>	<b>1 557 828</b>	<b>1 269 79</b>	<b>81.5 %</b>	*	-	-
Total emissions (location-based)	<b>5 108 484.5</b>	<b>5 004 506</b>	<b>5 093 67</b>	<b>101.8 %</b>	-	-	-
Total emissions (market-based)	<b>5 130 365.6</b>	<b>4 993 210</b>	<b>5 051 69</b>	<b>101.2 %</b>	*	-	-

Note 1: \* The targets set by Secil, and in accordance with validation by SBTi, were established in specific terms (kg CO<sub>2</sub>/t cement), rather than absolute values.

Note 2: To calculate scope 2 emissions according to the market-based approach, in the Lobito facilities location-based emission factors were used, as specific emission factors provided by the respective electricity suppliers are unavailable.

Note 3: The sum of total CO<sub>2</sub> emissions does not include scopes 1 and 2 emissions from biogenic sources.

Note 4: There were no significant changes in the definition of what constitutes the reporting company and its value chain [E1.47].

## E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

In accordance with Appendix C of ESRS 1, Secil has opted not to report information on the anticipated financial effects of climate-related impacts, risks and opportunities in this reporting year.

### 3.1.2.3. ESRS E2 – Pollution

#### SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with the strategy and business model

Description	Impact, Risk or Opportunity	Time horizon	Location in the value chain	Related sub-topic or sub-sub-topic [ESRS 2.48a]
[ESRS2.48a]	[ESRS2.48a]	[ESRS2.48ciii]	[ESRS2.48a]	
Release of atmospheric pollutant emissions (SOx, NOx, Particulates, etc.)	Negative impact	-	Own operations	Air pollution

Note: The material impacts identified are actual impacts and therefore do not have an associated time horizon.

At Secil, atmospheric emissions result from the raw materials used and from the mixture of fossil and alternative fuels used in the production process, and are classified as point source and fugitive emissions. The main point sources of emissions are associated with clinker kilns, coolers, and coal and cement mills. Fugitive emissions refer to fine dust particles, resulting mainly from movement during the transport, storage and handling operations of raw materials, solid fuels, clinker and cement.

#### MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

##### E2-1 – Policies related to pollution

Secil adopts two policies related to pollution: the Sustainability Policy (Chapter 3.1.4.1, G1) and the Quality, Environment, Health and Safety Policies implemented across the various geographies (Chapter 3.1.2.1) [E2.14 | ESRS 2.65a], framed within an integrated approach to sustainability and environmental responsibility [E2.15].

These policies guide a standard of responsible conduct, contributing to the harmonisation between the exploitation of natural resources and the maintenance and development of the ecosystems in which we operate. In this context, the company is committed to mitigating environmental impacts through the adoption of the best available technologies and practices, complemented by continuous and rigorous training for our employees.

In addition, the company promotes biodiversity in the territories under its management and the reduction of the carbon impact of its activities, namely through encouraging the use of secondary raw materials and alternative fuels.

The **Quality, Environment, Health and Safety Policies** also establish the regular disclosure of information on environmental performance, reinforcing transparency and enabling the continuous monitoring and assessment of progress achieved. [E2.15a]

The prevention of incidents and emergency situations is ensured through the Environmental Management System, which covers the identification, prevention and response to environmental emergencies and incidents. In Portugal, the effectiveness of the plants' response is tested annually through emergency drills based on risk scenarios identified in the Self-Protection Measures (SPM) and foreseen in the Internal Emergency Plan. [E2.15c]

## ACTIONS AND RESOURCES

### E2-2 – Actions and resources related to pollution

#### Actions

Main actions	Status	Scope of the action	Time horizon	Expected results/effects
[ESRS 2.68a   E2.16]	[ESRS 2.68e]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68e   ESRS 2.68a]
Periodic maintenance of machinery and equipment and preventive replacement of filter bags	Planned and completed	Portugal	Ongoing	Control measure to minimise the degradation of the quality of the receiving environment (water/soil/air)
Cleaning of retention basins and hydrocarbon separators and impermeable paving	Planned and completed	Portugal	Ongoing	Control measure to minimise the degradation of the quality of the receiving environment (water/soil)
Hydrated Lime Injection System	In progress	Portugal (Outão)	Short-term	Minimise the degradation of the quality of the receiving environment (water/soil/air). Compliance with the daily Emission Limit Values (ELVs) in accordance with the respective licence
Mist Cannon – Fugitive emissions	Completed	Portugal (Pataias)	Short-term	Minimise the degradation of the quality of the receiving environment (water/soil/air)
Acquisition of a watering truck for Escarpão	Completed	Portugal (aggregates)	Short-term	Reduction of fugitive emissions
Creation of a dust extraction system in Portimão	Completed	Portugal (aggregates)	Short-term	Reduction of point source emissions
Implementation of dust extraction systems	Planned and completed	Portugal, Brazil, Lebanon and Tunisia	Ongoing	Minimise the degradation of the quality of the receiving environment (water/soil/air)
Continuous monitoring of gas and particle emissions (point sources)	Planned and completed	Portugal, Brazil, Lebanon and Tunisia	Ongoing	Minimise the degradation of the quality of the receiving environment (water/soil/air). Compliance with the daily Emission Limit Values (ELVs) in accordance with the respective licence
Discontinuous measurement (heavy metals, dioxins and furans)	Planned and completed	Portugal, Brazil, Lebanon and Tunisia	Ongoing	Minimise the degradation of the quality of the receiving environment (water/soil/air). Compliance with the daily Emission Limit Values (ELVs) in accordance with the respective licence
Air Quality Monitoring Network	Planned and completed	Portugal, Secil-Outão	Ongoing	Minimise the degradation of the quality of the receiving environment (water/soil/air). Assess the potential influence of factory emissions on the ambient air quality in the surrounding area
Covered hangar for gypsum and clinker storage	Planned	Own operations – Portugal, Maceira	Medium-term	Minimise fugitive emissions



Within the context of pollution, the following actions stand out: implementation of dust extraction systems, automated control systems, continuous monitoring of gas and particle emissions, and the Air Quality Monitoring Network. [E2.18]

As part of its Environmental Management System, Secil has implemented over recent decades a set of actions aimed at controlling and reducing atmospheric emissions, namely NO<sub>x</sub>, SO<sub>2</sub> and particulate emissions, taking into account good practices as well as the best currently available techniques/ technologies.

With regard to fugitive emissions, various dust extraction equipment has been installed throughout the entire production chain, namely bag filters, which enable the collection of particles and their reintroduction into the production process, thereby promoting the reuse of materials. In addition, with the objective of contributing to the minimisation of emissions, the plants are equipped with industrial vacuum cleaners, mechanical sweepers, mist cannons and watering tankers for spraying water on the roads used by quarry fleets.

Regarding point source emissions (stacks) of gases and particles, the plants are equipped with gas analysers and opacimeters that enable the continuous monitoring of the various pollutants originating from kilns, coolers and coal and cement mills.

In Portugal, Secil-Outão also operates an Air Quality Monitoring Network (AQMN), through which pollutants such as PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, O<sub>3</sub> and CO are continuously monitored, enabling the assessment of the potential influence of factory emissions on the ambient air quality of the surrounding area.

At the level of financial resources, Secil has financing lines significantly exceeding its requirements, ensuring the coverage of all planned investments, as well as any new initiatives, without financial constraints. As such, the implementation of our environmental and social action plans does not depend on securing additional specific financing. However, a significant portion of our financing lines is directly linked to key sustainability indicators (environmental and social KPIs), reinforcing our commitment to integrating ESG criteria into the company's financial structure.

Investments made in continuous/spot measurement systems, as well as in the AQMN (Air Quality Monitoring Network), are reflected under the "External Supplies and Services" line item in Secil's Income Statement and, in terms of cash flows, are reflected in operating activities – payments to suppliers. [ESRS 2.69b]

### E2-3 – Targets related to pollution

Secil has not established specific quantitative targets for the reduction of atmospheric emissions, focusing instead on strict compliance with the Emission Limit Values (ELVs) applicable to each installation. At the same time, we ensure the continuous monitoring of the main pollutants, namely nitrogen oxides (NO<sub>x</sub>), sulphur dioxide (SO<sub>2</sub>) and particulate matter (PM), in line with legal requirements and industry best practices. This approach enables us to ensure real-time operational control and maintain the environmental compliance of our industrial operations.

The company ensures the full implementation of continuous monitoring plans and spot emission campaigns, as required by environmental licences and by the key performance indicators (KPIs) defined in the guidelines of the Global Cement and Concrete Association (GCCA). However, the definition and implementation of atmospheric emission reduction targets are planned for the next strategic cycle, 2026–2030. [ESRS 2.72 | ESRS 2.81a/b]

Despite the absence of formally adopted targets, the company monitors the effectiveness of its pollution-related policies and actions. To this end, all plants operate under an Environmental Management System (EMS) that includes specific licences for emissions monitoring and control, ensuring that industrial processes comply with applicable legal and environmental requirements. [ESRS 2.81]

## E2-4 – Air, water and soil pollution

As the release of atmospheric pollutant emissions (SO<sub>x</sub>, NO<sub>x</sub>, Particulates, etc.) was identified as a material impact, the values recorded for 2025 are presented below:

Pollutants	2025	2024
	Atmospheric emissions - absolute values (kg/year)	
PM	105 559.08	82 503.99
NO <sub>x</sub>	7 268 078.86	5 315 922.47
SO <sub>2</sub>	1 656 643.70	1 519 611.30
Hg	26.91	31.33
HM1	32.57	30.36
HM2	923.24	888.72
VOC/THC	91 959.65	75 824.00
PCDD/F	0.00006	0.00003

Note 1: PM, NO<sub>x</sub> and SO<sub>2</sub> are continuously monitored. Hg, HM1, HM2, VOC/THC, PCDD/F are measured periodically in accordance with the respective environmental licences.

Note 2: The reported PM, NO<sub>x</sub> and SO<sub>2</sub> data include only the Cement Business Area in the following geographies: Portugal (Maceira, Outão and Pataias Branco), Brazil (Adrianópolis), Lebanon (Sibline) and Tunisia (Gabès). The data reported from periodic measurements cover only Portugal and Brazil. [E2.31]

### 3.1.2.4. ESRs E3 – Water and marine resources

#### Strategy

#### SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with strategy and business model

Description	Impact, Risk or Opportunity	Time horizon	Position in the value chain	Related sub-topic or sub-sub-topic
[ESRS2.48a]	[ESRS2.48a]	[ESRS2.48cii]	[ESRS2.48a]	
Raw materials suppliers in the value chain account for significant water consumption, which can have negative impacts on the ecosystems and local communities.	Negative impact	-	Upstream	Water consumption
The company accounts for significant water consumption, which can have negative impacts on the ecosystems and local communities.	Negative impact	-	Own operations	Water consumption
Water withdrawal in areas facing water scarcity and/or stress (intensive use of shared resource).	Negative impact	-	Own operations	Water withdrawal
Water withdrawal (groundwater, surface, municipal, etc.) impacts on soil stability, ecosystem stability and restoration of river flows.	Negative impact	-	Own operations	Water withdrawal
Water scarcity	Risk	Medium-Term	Own operations	Water withdrawal

Note: The material impacts identified are actual and therefore do not have an associated time horizon.



The Group's manufacturing facilities comply with the national legislation applicable to the management and protection of water resources in the geographies where they are located and have an Environmental Management System implemented. Portugal and Lebanon have an Environmental Management System certified under the NP EN ISO 14001:2015 standard. Portugal is also certified by EMAS (Eco-Management and Audit Scheme). Within the scope of the Environmental Management System, environmental aspects and impacts are identified, as well as risks and opportunities associated with water resources [ESRS 2.48 b].

Additionally, in 2024, Secil Group launched the process of identifying climate risks and opportunities in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), with water stress being one of the risks identified through this analysis (see Chapter E1). This exercise was completed in 2025 and culminated in the development, publication and approval of the Water Policy (see section E3-1) [ESRS 2.48a | ESRS 2.48b | ESRS 2.53].

Within the scope of this assessment for the cement business, under the current scenario, an analysis of projections from the Aqueduct tool indicates the existence of Secil operations in areas of high susceptibility to water stress, namely the Maceira-Liz and Cibra-Pataias plants in Portugal, and the Gabès plant in Tunisia. Operations in areas of very high susceptibility to water stress were also identified, namely the Outão plant in Portugal and the Sibline plant in Lebanon [ESRS 2.48 b | ESRS 2.48 a].

Raw materials suppliers in the value chain, as well as the Group's own operations, account for significant water consumption, which may cause adverse impacts on ecosystems and local communities [ESRS 2.48 ci].

At Secil, water is used in the production of cement, concrete and aggregates, in the cleaning of plants, equipment and circulation routes, in reducing diffuse particle emissions, and in the irrigation of green spaces and rehabilitated quarry areas [ESRS 2.48 civ | ESRS 2.48 cii].

Water withdrawal in areas facing water scarcity or water stress represents an increased risk, given the intensive use of a shared and limited resource [ESRS 2.48 cii | ESRS 2.48 civ]. Additionally, water withdrawal from different sources (groundwater, surface water or public water supply) may impact soil stability, compromise ecosystem balance and affect the natural replenishment of river flows, increasing pressure on available water resources [ESRS 2.48 ci].

## Managing impacts, risks and opportunities

### E3-1 – E3-1 – Policies related to water and marine resources

Secil has developed and formalised a set of policies that frame water management, including the Sustainability Policy and the Quality, Environment, Health and Safety Policies, implemented across the different geographies. Within the scope of these policies, an Environmental Management System has been implemented in all geographies where Secil operates, ensuring a consistent and integrated approach to this resource.

The **Sustainability Policy** and the **Quality, Environment, Health and Safety Policies**<sup>11</sup> address sustainable development and promote responsible practices that contribute to the preservation of natural resources, including water, fostering its efficient use. Secil follows strict standards, such as ISO 45001, EMAS, ISO 9001, ISO 50001 and the GCCA guidelines, which ensure responsible environmental management by guaranteeing the monitoring and optimisation of water use [E3.11 | E3.12ai | ESRS 2.65 a].

<sup>11</sup> Quality, Environment, Energy, Health and Safety Policy in Portugal

In 2025, the **Water Policy** was developed and published with the aim of managing, conserving and using water resources responsibly throughout the organisation [E3.11 | ESRS 2.65 a]. This policy establishes the following commitments:

- Implement a quality control process to ensure the accuracy and reliability of water-related data [E3.12 aiii].
- Ensure that all wastewater is properly treated before discharge, in order to protect water resources and ecosystems [E3.12 aiii | E3.12 aii].
- Implement water-efficient technologies and promote water reuse and recycling in order to reduce freshwater consumption [E3.12 aii | E3.12 ai].
- Assess water risk areas and develop site-specific water management plans for facilities where risks are higher [E3.12 c].
- Continue the ongoing reduction of freshwater use across all operations [E3.12 ai].

This policy is aligned with SDG 6 (Clean Water and Sanitation), which aims to ensure the availability and sustainable management of water for all by 2030, and with the Paris Agreement, which, although related to climate change, directly impacts water resources due to rising global temperatures causing droughts and floods, requiring adaptation and mitigation policies [ESRS 2.65d].

The table below presents the key aspects of the policy adopted by the company for the management, conservation and responsible use of water resources.

## Policies

Document	Water Policy
<b>Key contents and objectives</b> [ESRS 2.65d]	It is aligned with global best practices, reinforcing the Group's commitment to water resources and sustainability for future generations. The policy defines Secil's responsibilities and targets regarding water resources.
<b>Scope</b> [ESRS 2.65b]	Own operations. Covers all Secil business units and geographies.
<b>Most senior level responsible for implementation</b> [ESRS 2.65c]	Sustainability Department
<b>Third-party standards or initiatives to which the company is committed</b> [ESRS 2.65d]	ISO 14001 – Environmental Management System ISO 9001 – Quality Management System EMAS GCCA – Global Cement and Concrete Association Cembureau Roadmap
<b>Availability</b> [ESRS 2.65f]	Secil Group website

Note: Despite the Water Policy having been developed in 2025, its final approval took place in January 2026.

The following information is incorporated by reference to other sections of the non-financial information statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Sustainability Policy – Chap. 3.1.4.1, G1
- Quality, Environment, Energy, Health and Safety Policies – Chap. 3.1.2.2, E1

## ACTIONS AND RESOURCES

### E3-2 – Actions and resources related to water and marine resources

#### Actions

Main actions	Status	Scope of the action	Time horizon	Results / Expected effects
[ESRS 2.68a   E3.15]	[ESRS 2.68e]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68e   ESRS 2.68a]
Water management plan	In progress	Portugal (Maceira)	Short-term	Modification of the marl quarry pumping system.
Wastewater treatment	Planned	Portugal (Outão e Maceira)	Short-term	Installation of a hydrocarbon separator in the basement near the tyre storage area at Outão. Installation of a hydrocarbon separator in the Scrap Yard at Maceira.
Reduction of water consumption through increased recycled/reused water	In progress	Tunisia (Gabès) and Lebanon (Beirut)	Medium-term	A 63% reduction in water consumption per tonne of cement has been achieved in Tunisia since 2020, and a 25% reduction in water withdrawal has been achieved in Lebanon since 2019.
Water reuse	Planned	Brazil (Adrianópolis e Pomerode).	Medium-term	Increase water reuse at the Pomerode unit by ensuring periodic maintenance of the reuse system. At the same time, assess the possibility of implementing a similar system at the Adrianópolis unit, based on the results obtained in Pomerode.
Update of the water network layout	Completed	Portugal (Maceira)	Medium-term	Update of the water network layout, covering the consumption network, industrial network, discharge points and consumption points.
Reduction of water consumption through separate industrial and rainwater networks	Planned	Portugal (Outão e Maceira).	Medium-term	Implementation of separate industrial and rainwater networks.
Assessment of the rainwater reuse potential	Planned	Portugal (Outão e Maceira)	Medium-term	Enhance the reuse of rainwater for cooling systems and irrigation.
Modification of the water supply network	Planned	Portugal (Outão e Maceira)	Medium-term	Connection of the quarry and harbour to the public water supply network at Outão. Connection of the technical/administrative buildings to the public water supply network at Maceira.
Water consumption – optimisation of water control equipment	Planned	Portugal (Outão)	Medium-term	Gradual replacement of meters with telemetry-enabled meters. Review/preparation of separate water network layouts.



An environmental Roadmap was developed for the Ambition 2025 cycle, structuring, by geography, the actions to be implemented regarding the use of water resources. In this context, 9 actions were defined, as specified in the table [E3.17 | E3.18b/c]. Of this set, eight cover operations located in areas characterised by high or very high susceptibility to water stress [E3.19].

The objective of this Roadmap is to promote efficient water management, based on the identification and control of water flows throughout the entire cycle, from withdrawal and use to discharge points. This approach not only enables the optimisation of water consumption, but also ensures the quality of discharged water by guaranteeing the proper treatment of effluents and strict compliance with the applicable legal requirements for each facility [E3.17 | E3.18b/c].

Secil's contribution focuses on the management, conservation and sustainable use of water resources through the minimisation of water consumption, ensuring the safe treatment of domestic and industrial wastewater, increasing water reuse at facilities, and encouraging both internal and external employees towards the conscious use of water [E3.17 | E3.18b/c].

With regard to water management, in addition to the projects previously mentioned, meters were installed at several facilities with the objective of improving the monitoring and efficiency of water consumption. Examples of these initiatives include the installation of water treatment systems in Portugal in the Aggregates business and the completion of meter installation at the facilities of the Concrete business in Portugal [ESRS 2.68e | ESRS 2.68 a].

## METRICS AND TARGETS

### E3-3 – Targets related to water and marine resources

Although a global water target has not yet been defined, some facilities have already established specific targets for reducing consumption and have incorporated reuse practices. Secil systematically monitors the effectiveness of its policies and actions through the Environmental Roadmap 2025, which defines actions related to water management in each geography where it operates [ESRS 2.81bi]. In parallel, the progress achieved is monitored through the following KPIs, using 2020 as the reference year [ESRS 2.81b ii]:

- Groundwater withdrawal (metric monitored in Lebanon);
- Water withdrawal (metric monitored at the Adrianópolis plant in Brazil);
- Water consumption (metric monitored in Tunisia).

### E3-4 – Water consumption

Water management at Secil is based on the identification of the different water flows (withdrawal, use and discharge) with the objective of controlling the quantity of water consumed and ensuring the quality of the water returned to the environment, while simultaneously guaranteeing the proper treatment of effluents and compliance with the legal requirements established in the permits of each facility.

The first two tables present the quantitative results of the assessment of water consumption flows (difference between water withdrawal and discharge) across Secil's different business areas. The first table presents the total water consumption, in cubic metres (m<sup>3</sup>), of Secil's operations, while the second presents the water consumption associated with water stress areas identified using the Aqueduct Tool, namely: the Outão, Maceira and Cibra-Pataias plants in Portugal, the Gabès plant in Tunisia, and the Sibline plant in Lebanon [E5.28a | E5.28b].

The third table presents the water intensity associated with Secil's operations, referring to total water consumption, in m<sup>3</sup>, per million euros of net revenue [E5.29].

	2025	2024
	<b>Water consumption (m<sup>3</sup>)</b>	
Cement	1 200 217.62	1 200 892.00
Concrete	345 199.69	336 194.10
Mortars/lime	9 176.60	5 335.35
Aggregates	32 387.75	21 753.56
Other materials	2 363.70	2 851.28
<b>Total</b>	<b>1 589 345.36</b>	<b>1 567 026.29</b>

Note: The data relating to water consumption result from calculating the difference between water withdrawn and water discharged. Water withdrawal in the cement and materials facilities is essentially obtained by direct measurement (1% corresponds to estimates). [E3.AR29] Estimations for the volume of water discharged depend on the discharge site and can be based on different approaches: information on precipitation, estimated volume of water used in a certain procedure, prior direct measurements, whenever there is historic data or monitoring systems have been installed. [E3.28e]

	2025	2024
	<b>Water consumption in areas of water-stress (m<sup>3</sup>)</b>	
Cement	961 577.24	984 640.98
Concrete	36 669.79	24 939.20
Other materials	979.70	734.28
<b>Total</b>	<b>999 226.73</b>	<b>1 010 314.46</b>

Note: The identification of facilities in water stress areas was carried out using the Aqueduct tool, revealing that in Portugal, the Outão plant is located in an area of very high susceptibility to water stress, while the Maceira-Liz and Cibra-Pataias plants are situated in areas of high susceptibility. The Gabès plant in Tunisia is located in an area of high susceptibility to water stress, and the Sibline plant in Lebanon is located in an area of very high susceptibility to water stress.

	2025	2024
Water intensity (m <sup>3</sup> /M€)	2 115.45	2 232.75

### E3-5 – Anticipated financial effects from material physical and transition risks and potential opportunities related to water and marine resources

In accordance with Appendix C of ESRS 1, Secil has opted not to report information on the anticipated financial effects of impacts, risks and opportunities related to water and marine resources in this reporting year.

### 3.1.2.5. ESRS E4 – Biodiversity and ecosystems

#### STRATEGY

#### **SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with strategy and business model**

Description	Impact, Risk or Opportunity	Time horizon	Position in value chain	Related sub-topic or sub-sub-topic
[ESRS2.48a]	[ESRS2.48a]	[ESRS2.48ciii]	[ESRS2.48a]	
The Group's activities generate GHG emissions that indirectly negatively affect biodiversity and ecosystems.	Negative impact	-	Own operations	Climate change
Quarrying activities cause significant land-use changes (e.g. physical changes to soil and landscape, hydrology, loss of ecosystems and biodiversity).	Negative impact	-	Upstream and own operations	Land-use change, freshwater-use change and sea-use change
The activities of suppliers of materials and services in the value chain may cause biodiversity loss.	Negative impact	-	Upstream	Population size of species
The company's operations and activities in and/or near biodiversity-sensitive areas lead to the deterioration of natural habitats and the disturbance of species.	Negative impact	-	Own operations	Population size of species
The activities of suppliers of materials and services may result in severe soil degradation, which in turn may generate significant negative impacts on local biodiversity.	Negative impact	-	Upstream	Soil degradation
Quarrying activities impact soil degradation through soil removal (which may influence the destruction of soil structure, erosion and changes in local hydrology and topography).	Negative impact	-	Own operations	Soil degradation
The company's exploitation and/or poor management of natural resources may lead to negative impacts on ecosystem services.	Negative impact	-	Own operations	Impacts and dependencies on ecosystem services
The development of partnerships with academia and/or other entities in the development of scientific studies may contribute to the promotion and conservation of biodiversity and restoration methodologies.	Positive impact	-	Own operations	Direct impact drivers of biodiversity loss

Note: The material impacts identified are actual and therefore do not have an associated time horizon.



Secil recognises the importance of preserving biodiversity and ecosystems in the regions where it operates. As an extractive industry, the company understands the environmental and social impacts arising from its operations, particularly on ecosystem balance and the diversity of plant and animal life, which are fundamental elements for human health and well-being [ESRS 2.48 ci].

Quarrying activities have recognised impacts on the landscape, particularly in terms of changes to landforms, soil removal and vegetation cover [ESRS 2.48 ci | E4.16b]. These effects translate into threats to local biodiversity, particularly in areas considered sensitive in biodiversity terms, namely through habitat loss and fragmentation, as well as the direct mortality and disturbance of species [E4.16b | E4.16c | ESRS 2.48 c].

For this reason, Secil has been working to minimise impacts on biodiversity and accelerate the natural colonisation process of its quarries. This objective has been achieved through programmes that promote the rehabilitation of the structure and functioning of floristic and faunal communities, as well as original ecosystems [ESRS 2.48 b].

In some cases, Secil's activities take place in ecologically sensitive areas. All quarrying areas in the cement and aggregates businesses are subject to differentiated attention, especially those located in conservation areas [ESRS 2.48 cii]. Currently, the company owns six quarries located in the following protected areas [E4.16a]:

- Sesimbra ( Arrábida Natural Park and Rede Natura 2000);
- Outão property ( Arrábida Natural Park and Rede Natura 2000);
- Madeira (Madeira Natural Park, partially);
- Adrianópolis (Mata Atlântica Reserve).

## MANAGING IMPACTS, RISKS AND OPPORTUNITIES

### E4-2 – Policies related to biodiversity and ecosystems

Biodiversity management is integrated into Secil's mission, ensuring the sustainability and resilience of its operations in the face of socio-environmental challenges. With the objective of minimising negative impacts and accelerating the natural regeneration of quarries, ecosystem rehabilitation programmes have been implemented, and policies focused on biodiversity and ecosystem conservation have been adopted, namely the Biodiversity Policy, the Quality, Environment, Health and Safety Policies<sup>12</sup> implemented across the different geographies, and the Sustainability Policy [E4.23 b | E4.24a | AR16 b/c].

Through these policies, the company aims to reverse biodiversity loss and promote the sustainable use of natural resources, in full alignment with the following initiatives: the United Nations Decade on Ecosystem Restoration (2021–2030), the European Green Deal launched in 2019, with the EU Biodiversity Strategy for 2030 as one of its central pillars, the EU Nature Restoration Law, and the Kunming-Montreal Global Biodiversity Framework [ESRS 2.65 d].

The table below presents the key aspects of the policy adopted by the company for biodiversity and ecosystem conservation.

<sup>12</sup>Quality, Environment, Energy, Health and Safety Policy in Portugal

## Policies

<b>Document</b>	<b>Biodiversity Policy</b>
<b>Key contents and objectives</b> [ESRS 2.65d]	It is aligned with global best practices, reinforcing the Group's commitment to biodiversity and sustainability for future generations. The policy defines Secil's responsibilities and targets regarding biodiversity.
<b>Scope</b> [ESRS 2.65d]	Own operations. Covers all Secil business units and geographies.
<b>Most senior level responsible for implementation</b> [ESRS 2.65d]	Sustainability Department
<b>Third-party standards or initiatives to which the company is committed</b> [ESRS 2.65d]	ISO 14001 – Environmental Management System ISO 9001 – Quality Management System EMAS GCCA – Global Cement and Concrete Association (Biodiversity Policy) Cembureau Biodiversity Roadmap
<b>Availability</b> [ESRS 2.65f]	Secil website

The Biodiversity Policy establishes that the net impact on biodiversity must be assessed across the entire Secil Group, with particular attention to sites of high conservation value [E4.24a]. This framework enables a comprehensive understanding of the impacts generated, establishing the basis for the implementation of measures that promote positive outcomes for nature [E4.23c | E4.23e | AR16c]. In this context, Secil's approach to biodiversity is based on informed and contextualised management of impacts at local level, including manufacturing facilities, quarries and surrounding areas. This approach prioritises Secil's own operations and considers the specific ecological characteristics of each area [E4.23e].

The Quality, Environment, Health and Safety Policies and the Sustainability Policy complement the Biodiversity Policy. This framework aims to ensure the mitigation of negative impacts on the environment, including biodiversity and ecosystems, not only in Secil's own operations but also throughout its entire value chain, promoting an integrated and consistent approach to environmental management [E4.23d | AR16c | E4.23c].

The following information is incorporated by reference to other sections of the non-financial information statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Sustainability Policy – Chap. 3.1.4.1, G1
- Quality, Environment, Energy, Health and Safety Policies – Chap. 3.1.2.2, E1

## ACTIONS AND RESOURCES

### E4-3 – Actions and resources related to biodiversity and ecosystems

#### Actions

Main actions	Status	Scope of the action	Time horizon	Results / Expected effects
[ESRS 2.68a   E4.25]	[ESRS 2.68e]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
Quarry rehabilitation	Planned and completed	All geographies	Long-term	Implementation of quarry rehabilitation plans (cement and aggregates), rehabilitation of areas affected by quarrying activities, and promotion of scientific knowledge production and innovation in the field of active biodiversity conservation.
Flora monitoring	Planned and completed	Portugal (Outão)	Medium-term	Compliance with the flora monitoring protocol.
Fauna monitoring	Planned and completed	Portugal (Outão e Sesimbra)	Medium-term	Compliance with the fauna monitoring protocol.
Internal biodiversity guide	Completed	All geographies	Medium-term	Development and implementation of internal guidelines on restoration/rehabilitation and biodiversity management to promote the development of standard tools applicable across the Secil Group.

Secil's objective is to adopt practices that minimise the impacts on biodiversity arising from the exploitation of its quarries, while simultaneously promoting the acceleration of the natural colonisation process of these areas. This objective has been achieved through restoration programmes that promote the rehabilitation of the structure and functioning of floristic and faunal communities, as well as original ecosystems. Accordingly, these initiatives fall within the third level of mitigation (Restoration/ Rehabilitation) [E4.28a].

These initiatives contribute to mitigating disturbances arising from quarrying activities, creating favourable habitats for fauna and flora, supporting the recovery of threatened species, reducing soil erosion, and promoting ecosystems that are more resilient to climate change. Additionally, in some locations, Secil monitors fauna and flora populations and identifies, manages and implements surveillance and control actions for invasive species [E4.28a | ESRS 2.68a].

Restoration practices have been implemented through the application of Nature-based Solutions<sup>13</sup>, exploring the complementarity between local knowledge of natural systems and the floristic species that compose them, together with the use of natural engineering techniques. This approach enables the mitigation of negative environmental impacts, promotes the recovery of degraded ecosystems, and fosters the sustainable use of these areas, strengthening their ecological resilience [E4.28 c | E4.28 a].

<sup>13</sup> Nature-based Solutions – Solutions inspired and supported by nature that are cost-effective, simultaneously provide environmental, social and economic benefits, and contribute to strengthening resilience. These solutions introduce more nature and more diverse natural features and processes into cities, landscapes and marine areas through locally adapted, resource-efficient and systemic interventions.



Secil has promoted the production of 17 native floristic species in its nurseries, which are subsequently used in the rehabilitation processes of the Outão quarry and other Group quarries. The success of this practice is based on the high level of technical knowledge of its teams in the propagation of native plants occurring in adjacent natural habitats. This process includes cutting and seed germination methods, involving the collection of seeds from ripe fruits and their post-processing through appropriate techniques to break dormancy and promote seedling development. Quarry rehabilitation is carried out in accordance with best practices in natural engineering, using different complementary techniques [E4.28c | ESRS 2.68a]:

1. Direct planting of native species to restore intervened areas and promote biodiversity;
2. Application of hydroseeding<sup>14</sup> techniques to stabilise slopes and prevent erosion;
3. Creation of ecological corridors that promote connectivity between natural habitats and restored areas; and
4. Promotion of breeding sites (e.g. ponds) and refuges for fauna in restored areas.

The implementation of these initiatives is also supported by Universities, Associations and Regulatory Entities present across the different geographies. In the specific case of the development of quarry rehabilitation plans in Brazil, the process also involved the participation of internal employees and the support of specialised consultancy services [ESRS 2.68b].

Secil has contracted financing facilities (read Chapter 3.2.3. on sustainable financing) in an amount significantly higher than its needs in order to guarantee the planned investments (and others that may arise) without financial constraints, not depending on the contracting of specific facilities for the implementation of environmental or social action plans. Approximately 74% of the financing facilities available to the Group are sustainable financing facilities. In Portugal, these facilities represent 73% of the total contracted facilities, with 235 million euros in sustainable financing (SLB and SLL), and the remainder in bond loans associated with the CCL and Profuture projects amounting to 75 million and up to 72 million euros, respectively. Brazil and Tunisia also have sustainable financing facilities, totalling 531 million euros across the Group at the end of 2025. These amounts can be found in Note 8.1.3. Liquidity risk of the financial statements [ESRS 2.69a | ESRS 2.69c].

The current financial resources allocated to these actions are represented in the income statement as personnel expenses and external supplies and services. In terms of cash flows, these correspond to outflows related to personnel expenses and payments to suppliers [ESRS 2.69b].

## METRICS AND TARGETS

### E4-4 – Targets related to biodiversity and ecosystems

Secil has established two measurable targets related to the material matters of Biodiversity and Ecosystems, with the objective of monitoring and assessing the progress achieved. These targets, although not science-based, were established with the involvement of internal stakeholders and apply to the Group's own operations across all geographies where it operates [ESRS 2.80h | ESRS 2.80g | E4.32d].

As previously mentioned, these targets are aligned with the main international and European frameworks relevant in this context, namely [ESRS 2.80f | E4.32b]:

- the United Nations Decade on Ecosystem Restoration (2021–2030);
- the European Green Deal launched in 2019, with the EU Biodiversity Strategy for 2030 and the EU Nature Restoration Law as central pillars; and
- the Kunming-Montreal Global Biodiversity Framework.

<sup>14</sup> Hydroseeding is a technique that projects a liquid mixture of seeds and substrates onto the soil in order to promote revegetation and control erosion.

## Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
<b>[ESRS 2.80b   E4.29]</b>	<b>[ESRS 2.80d]</b>	<b>[ESRS2.75   ESRS2.80b]</b>	<b>[ESRS 2.80j]</b>	<b>[ESRS 2.80j]</b>	<b>[ESRS 2.80b]   [ESRS 2.80e]</b>
Target 1: All active quarries with rehabilitation plans	77% Base year: 2020	% of quarries with rehabilitation plans	90%	100%	100%
Target 2: All high biodiversity value areas with Biodiversity Management Plans	40% Base year: 2020	% of high biodiversity value areas with Biodiversity Management Plans	83%	88%	100%

Note: The calculation method for the targets/metrics remained unchanged compared to the previous year [ESRS 2.80i | E4.32d]. The targets only consider active quarries and cover the geographies of Portugal, Brazil, Tunisia and Lebanon.

The targets presented are directly related to the company's Biodiversity Policy. The targets operationalise this policy through concrete and measurable actions, such as [ESRS 2.80a | E4.31]:

1. The development of internal guidelines for biodiversity restoration, rehabilitation and management applicable across the entire Secil Group;
2. The promotion of strategic partnerships with local communities, NGOs and the academic sector, in line with the principle of collaborative action;
3. The requirement that all quarries have an active rehabilitation plan and biodiversity management plans whenever the sites present high ecological value; and
4. The promotion of scientific knowledge production and innovation, reinforcing the company's role in active biodiversity conservation.

Target 1 aims to ensure that all the company's active quarries have a properly defined and implemented rehabilitation plan [E4.32c | E4.32d]. This target is essentially framed within level 3 of the mitigation hierarchy (Restoration/Rehabilitation), as it monitors the progress of actions focused on restoring ecosystems affected by quarrying activities [E4.32f]. In 2025, all active quarries had 100% rehabilitation plans implemented, contributing to the restoration and rehabilitation of habitats in order to promote ecosystem recovery and biodiversity enhancement [E4.29].

Target 2 aims to ensure that **all quarries located in classified areas and high biodiversity value areas** under the company's responsibility have biodiversity management plans, promoting the protection and enhancement of ecosystems [E4.32c]. This target is essentially framed within level 2 of the mitigation hierarchy (Minimisation), as the objective is to mitigate impacts in areas where the company is already operating [E4.32f]. In 2025, 88% of quarries had biodiversity plans implemented; only in Madeira, which is partially protected, was a BMP (Biodiversity Management Plan) not implemented [ESRS 2.79c | E4.29]. This metric is particularly relevant in the protected areas where the company operates, reinforcing its commitment to nature conservation [E4.32d].

Secil follows the GCCA guide Sustainability Guidelines for Quarry Rehabilitation and Biodiversity Management in defining the targets presented above [ESRS 2.80f].

## E4-5 – Impact metrics related to biodiversity and ecosystem change

Number (sites)	8	6
Area (hectares) 499	1 300	500

Some of the areas where Secil operates are located in ecologically sensitive areas. Secil has 1 300 hectares of property within the national protected areas network in Portugal (Arrábida Natural Park and Natura 2000 Network, partially in the Madeira Natural Park) and in Brazil, within an Atlantic Forest reserve [E4.35].

The calculation of the metrics presented is based on the KPIs defined by the GCCA Sustainability Guidelines for Quarry Rehabilitation and Biodiversity Management, which constitute key performance indicators used for the monitoring and assessment of rehabilitation and biodiversity management practices [ESRS 2.77a/b].

### 3.1.2.6. ESRS E5 – Resource use and circular economy

#### STRATEGY

#### SBM-3 (ESRS 2) –Material impacts, risks and opportunities and their interaction with strategy and business model

Description	Impact, Risk or Opportunity	Time horizon	Position in the value chain	Related sub-topic or sub-sub-topic
<b>[ESRS2.48a]</b>	<b>[ESRS2.48a]</b>	<b>[ESRS2.48ciii]</b>	<b>[ESRS2.48a]</b>	
Extraction/use of raw materials from non-renewable resources.	Negative impact	-	Upstream and own operations	Resource inflows, including resource use
Recovery of waste/by-products.	Positive impact	-	Own operations	Resource inflows, including resource use
Development of techniques, processes, procedures and products in order to enable balance in resource availability and avoid resource scarcity in the short/medium and long term.	Positive impact	-	Own operations	Resource inflows, including resource use
Promotion of activities and partnerships in the field of circular economy in by-products and waste, including circular bioeconomy and R&D projects.	Opportunity	Short-term – Reporting year	Upstream	Waste

Note: The material impacts identified that do not have an associated time horizon, are actual.



Secil carried out a double materiality assessment in order to identify and assess the impacts, risks and opportunities associated with its activities, products and services, including those related to the circular economy [E5.11].

The type and quantity of materials used in the Secil Group's operations reflect its dependence on natural resources and the impacts these have on their availability [ESRS 2.48ci]. As part of the cement industry, Secil records high consumption of non-renewable raw materials, namely limestone and marl [ESRS 2.48cii | ESRS 2.48civ].

It should be noted that cement and concrete have a long life cycle and, unlike a large number of construction materials, both present the unique characteristic of being fully recyclable at the end of their life cycle. Through the processing of construction and demolition waste, following separation and crushing treatment, these materials can be reintroduced into the cement and concrete production chain [ESRS 2.48civ]. The incorporation of recycled raw materials from demolition waste from buildings and infrastructure presents high potential, enabling the reduction of virgin raw material consumption and the environmental impacts associated with their extraction and the disposal of waste in landfill [ESRS 2.48ci | ESRS 2.48cii].

In addition, the Secil Group has prioritised the replacement of fossil fuels with alternative fuels in its industrial processes, as part of its commitment to reducing its environmental footprint (see section Actions and Resources) [ESRS 2.48civ]. Practices implemented include the use of end-of-life tyres and refuse-derived fuel (RDF) in Portugal and Brazil [ESRS 2.48ci | ESRS 2.48cii].

In Portugal, a project currently at an early stage, with several ongoing analysis and development actions, is focused on the circularity of construction and demolition waste, aiming to reuse recycled aggregates as a substitute for natural aggregates.

## MANAGING IMPACTS, RISKS AND OPPORTUNITIES

### E5-1 – Policies related to resource use and circular economy

Secil adopts a set of policies related to resource use and circular economy, namely the **Sustainability Policy** and the **Quality, Environment, Health and Safety Policies**<sup>15</sup> implemented across the different geographies [E5.14 | ESRS 2.65a]. These policies promote circularity upstream through the incorporation of alternative raw materials<sup>16</sup> and the use of alternative fuels, and downstream through the efficient management of the waste generated [E5.15a/b | AR9a/b | E5.16]. Within this framework, waste collection and storage are carried out separately, through specific waste streams and in dedicated areas within Secil's facilities. Whenever possible, waste recovery solutions are prioritised, in accordance with the principles of the waste hierarchy, reinforcing a responsible and integrated approach to waste management [AR9b].

Secil's Sustainability Policy is framed within the third level of the waste hierarchy (recycling) through the use of alternative raw materials, promoting circularity and reducing the consumption of natural resources [AR9a].

The Quality, Environment, Health and Safety Policies are framed within the fourth level of the waste hierarchy, corresponding to other recovery operations, namely through the co-processing of alternative fuels, while simultaneously ensuring energy efficiency and waste recovery [AR9a].

<sup>15</sup> Quality, Environment, Energy, Health and Safety Policy in Portugal

<sup>16</sup> Alternative Raw Materials – Raw materials originating from non-primary materials (waste, secondary materials, by-products or co-products).

The following information is incorporated by reference to other sections of the non-financial information statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Sustainability Policy – Chap. 3.1.4.1, G1
- Quality, Environment, Energy, Health and Safety Policies – Chap. 3.1.2.2, E1

## E5-2 – Actions and resources related to resource use and circular economy

### Actions

The table below presents a summary of the main initiatives, together with the status of each project.

Main actions	Status	Scope of the action	Time horizon	Results/Expected effects
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
Calcined clays project	Planned	Portugal (Outão e Maceira)	Medium-term	Reduction of clinker and other natural raw material consumption. Production of a clay + boiler ash blend (35% + 65%) in Pataias for use in the Maceira and Outão plants.
Acquisition of a mobile crusher for crushing alternative raw materials	Planned	Portugal (Outão e Maceira)	Medium-term	Increase in the incorporation of alternative raw materials.
Cementitious project	Planned	Portugal (Outão e Maceira)	Short-term	Drying and processing of cementitious materials, aimed at equipping the plants with suitable infrastructure to process and dry large volumes of cementitious materials. Reduction of the clinker percentage in cement production through increased incorporation of alternative raw materials.
Clean Cement Line Project – Monitoring of results and optimisation of the operational production process	Completed	Portugal (Outão)	Medium-term	Eliminate fossil fuel consumption, achieve a 20% reduction in thermal energy, ensure that 30% of the electricity consumed is produced internally through heat recovery, and increase the co-processing rate of alternative fuels to values above 70%.
Profuture Maceira Project	Planned	Portugal (Maceira)	Medium-term	Eliminate fossil fuel consumption (90% alternative fuels + 10% green H <sub>2</sub> ), promoting waste recovery, and reduce total energy consumption by approximately 20.8%.
Increase in the consumption of alternative fuels in Lebanon and Tunisia	Planned	Lebanon (Sibline) and Tunisia (Gabès)	Medium-term	Achieve a 40% alternative fuel rate.

The contribution to the circular economy is achieved through two complementary vectors. On the one hand, the projects promote a more efficient use of resources, namely through the reduction of dependence on non-renewable fuels and natural raw materials, and through the more efficient use of energy (thermal and electrical) [E5.20a | E5.20b]. On the other hand, they reinforce more efficient waste management through the incorporation of waste into production (for example: construction and demolition waste), consolidating an integrated and circular approach to the production process [E5.20e | E5.20f].

Secil has consistently developed a set of measures and initiatives in the context of resource use and circular economy, mainly within the scope of two major projects in Portugal: the Clean Cement Line project at Outão and the Profuture, Clean Cement Line project at Maceira (Chap. 3.1.2.2) [ESRS 2.68a | E5.19].

The implementation of the CCL project at the Outão plant has, as one of its main objectives, increasing the co-processing rate of alternative fuels to values above 70%, promoting waste recovery and contributing to the reduction of fossil fuel use [E5.20c | E5.20a]. In addition, the project includes the optimisation of energy consumption through the incorporation of circular practices, namely the recovery of residual heat generated at the end of the production process through a WHR (Waste Heat Recovery) system, which contributes to the reduction of energy from primary sources (see Chapter E1) [E5.20d | E5.20f].

Similarly, through the Profuture, Clean Cement Line project at Maceira, the objective is to achieve the “zero fossils” milestone (90% alternative fuels + 10% green hydrogen), improving energy efficiency (reduction of energy consumption by approximately 20.8% compared to the reference year (2019)) and contributing to decarbonisation (reduction of GHG emissions by approximately 30.3%) (see Chapter E1).

At the Adrianópolis unit in Brazil, investments were made to expand storage capacity, creating the necessary conditions to increase the consumption of alternative fuels during 2024. In 2025, efforts remained focused on identifying new suppliers and increasing the quality of alternative fuels, in order to ensure that the intended incorporation rate is achieved. In parallel, at the Gabès and Sibline units, located respectively in Tunisia and Lebanon, medium-term investments are planned with the objective of preparing the plants for greater incorporation of this type of fuel [E5.20b | E5.20d].

In Sibline and Gabès, with the implementation of the Capex Projects – Use of Alternative Fuels, the objective is to achieve a 40% alternative fuel utilisation rate; and in Gabès, to start using alternative fuels in addition to olive waste [E5.20b | E5.20d].

The actions adopted, presented in the table above, have resulted in several benefits, both globally and for Secil. With the implementation of the Clean Cement Line Outão Project, currently in the optimisation phase, it will be possible to achieve the “zero fossils” target and reduce thermal energy consumption by approximately 20%, as well as increase electricity production for self-consumption by approximately 30%.

## METRICS AND TARGETS

### E5-3 – Targets related to resource use and circular economy

Secil has defined two measurable targets to be achieved by 2030, which, although not mandatory under the applicable legislation, are outcome-oriented, time-bound and aligned with the material sustainability matters established to monitor the progress achieved [E5.27]. These targets, presented in the table below, remained unchanged compared to the previous reporting year [ESRS 2.80i].

#### Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2030 Target
[ESRS 2.80b   E5.21]	[ESRS 2.80d]	[ESRS2.75   ESRS2.80b]	[ESRS 2.80j]	[ESRS 2.80j]	[ESRS 2.80b ESRS 2.80e]
Target 1: Increase the percentage of alternative fuels to 49%	26,2% Base year: 2020	Percentage of alternative fuels (%)	25.4%	25.9%	49% alternative fuels and 5% sustainable biomass
Target 2: Reduce the clinker factor to 65% (in Portugal) and 74% (Other geographies)	80,2% (Portugal) 79,3% (Other geographies) Base year: 2020	Clinker incorporation percentage (%)	79,04 % (Portugal)	79,4% (Portugal)	65% (Portugal)
			78,9% (Other geographies)	79,6% (Other geographies)	74% (Other geographies)

Note 1: The performance results were presented with the same boundary as Secil's decarbonisation roadmap (cement plants: Maceira, Outão, Sibline, Gabès, Adrianópolis and Pomerode).

Note 2: No changes were made to the target values, year, calculation methodology, assumptions, sources or limitations [ESRS 2.80i | ESRS2.13], and no errors relating to previous periods were identified [ESRS2.14].

The measurable targets established are not science-based and were defined as: alternative fuels (Target 1) and clinker factor (Target 2) [ESRS 2.80g]. These targets cover own operations in Portugal, Brazil, Lebanon and Tunisia [ESRS 2.80c].

Secil is developing innovation projects, with emphasis on the use of new cementitious materials, such as calcined clays, in addition to grinding optimisations that increase reactivity and improve energy efficiency and productivity [ESRS 2.79a]. The targets were developed based on the company's strategic cycles and objectives and are related to the context in which the plants operate, such as the market availability of alternative fuels. Sector benchmarks (GCCA, Cembureau) and the adoption of best practices guided the definition and monitoring of the targets [ESRS 2.80f].

Both targets contribute to a circular economy and the reduction of negative environmental impacts:

**Target 1**, focused on replacing fossil fuels with alternative fuels (e.g. refuse-derived fuels, end-of-life tyres and biomass), promotes circularity by reducing the need for landfill waste disposal and thereby supporting the third level of the waste hierarchy (recycling) [E5.24b | E5.24e | E5.25].

**Target 2**, focused on reducing the clinker factor through the partial replacement of clinker with decarbonated alternative raw materials with cementitious properties, such as calcined clays, is framed within the first level of the waste hierarchy (prevention), by reducing the need for virgin raw materials, lowering thermal and electrical energy consumption, and promoting more efficient resource use [E5.24b | E5.24c | E5.25]. It should be noted that part of these alternative raw materials corresponds to reused waste, such as silico-aluminous waste; therefore, the target also contributes secondarily to the third level of the waste hierarchy (recycling) by reintegrating these materials into the production process [E5.24b | E5.24c | E5.25].

In the current reporting year, Secil's performance is monitored in a structured manner by the Sustainability Committee, which quarterly analyses the progress of targets against the actual accumulated values. The Group's environmental targets are defined in the Medium-Term Plans of each business unit and subsequently integrated into the annual budget. Within the daily, weekly and monthly management cycles of the business units, the targets are monitored, enabling the timely adoption of corrective actions whenever deviations are identified [ESRS 2.80j].

The targets presented are aligned with the Sustainability Policy and are supported by the development plans of the business units, namely the Plant Development Plan and the Capex Plan. The Sustainability Policy establishes the objectives and guides the prioritisation of Secil's actions, identifying the environmental dimension, including resource use and circular economy, as one of its priority areas [ESRS 2.80a].

### E5-4 – Resource inflows

For Secil, the circular economy plays a crucial role in the cement industry due to its potential positive impacts on waste reduction and the efficient use of resources. The integration of industrial waste and alternative materials as substitutes for traditional raw materials contributes to reducing dependence on finite natural resources and strengthening material circularity. At the same time, this approach promotes greater competitiveness by enabling the reduction of operational costs, mitigating risks associated with raw material availability, and responding to the growing demand for more sustainable products.

The consumption of these resources may differ depending on the geography and the period under analysis, influenced both by the level of activity and by the characteristics and scale of the projects under development. The table below details the main resource inflows resulting from the cement industry activities carried out by Secil [E5.30].

Operations	Resource inflows
[E5.30]	[E5.30]
<b>Produtos</b> (incluindo acondicionamento)	<b>Aggregates:</b> Lubricating oils, explosives <b>Cement:</b> Grinding aids, paper bags, plastic, plastic film and explosives. <b>Mortars:</b> Cement, paper bags. <b>Concrete:</b> Cement, concrete admixtures.
<b>Materials</b> (particularly with regard to critical raw materials and rare earths)	<b>Aggregates:</b> Limestone or granite. <b>Cement:</b> Limestone, marl, clay, sand, gypsum, iron oxide. <b>Mortars:</b> Sand, crushed stone. <b>Concrete:</b> Sand, crushed stone.
<b>Water and assets</b>	<b>Aggregates:</b> Water. <b>Cement:</b> Water. <b>Mortars:</b> Water. <b>Concrete:</b> Water.

The two tables below present the quantitative results of the assessment of resource inflows involved in Secil's operations. The first table presents the total weight of products and technical and biological materials, in metric tonnes (t), whereby biological materials were considered not applicable for the company [E5.31a | E5.31b]. The second table presents the total weight of components, products and materials, broken down by type of composition (secondary materials and primary materials) [E5.31c].

	Unidade Unit	2025	2024
<b>Technical and biological products and materials used in own operations [E5.31a]</b>			
Weight of the products used	t	921 386	1 217 436
Weight of the technical materials used	t	18 897 622	16 461 304

Weight of the biological materials used	t	—	—
Overall weight of the technical and biological products and materials used	t	19 819 009	17 678 740

Note: The "weight of products used" corresponds to the sum of cement products and construction materials products, while the "weight of technical materials used" results from the sum of cement materials and construction materials. It should be noted that fuels were not considered in calculating the weight of technical and biological products and materials used in our own operations.

	2025				2024			
	Unidade	Materials alternativos	Primários	Total	Materials alternativos	Primários	Total	Total
<b>Secondary components, products and materials [E5.31c]</b>	<b>Unit</b>	<b>Alternative materials</b>	<b>Primary</b>	<b>Total</b>	<b>Alternative materials</b>	<b>Primary</b>	<b>Total</b>	<b>Total</b>
Aggregates	t	—	5 861 893	5 861 893	—	5 467 395.12	5 467 395.12	
Cement	t	1 417 270	7 393 137	8 810 407	806 699.37	6 747 562.39	7 554 261.76	
Concrete	t	4 485	4 763 422	4 767 907	2 900.19	4 291 941.09	4 294 841.28	
Mortars / Hydraulic lime	t	1 048	345 475	346 523	1 492.00	322 669.02	324 161.02	
Other construction materials	t	—	32 279	32 279	—	38 081.21	38 081.21	
<b>Total</b>	<b>t</b>	<b>1 422 803</b>	<b>18 396 206</b>	<b>19 819 009</b>	<b>811 091.56</b>	<b>16 867 648.8</b>	<b>17 678 740.3</b>	

### E5-5 - Resource outflows

Aware of its impacts and of the potential of the sector in which it operates, Secil has been adopting corporate strategies focused on circularity, reuse and recycling of materials, promoting a more efficient use of resources and the generation of economic value. The table below, relating to resource outflows, presents the total waste generated, broken down by type, by treatment flow for recovery operations, in metric tonnes (t), and by business area (aggregates, cement, concrete, mortars/hydraulic lime and other construction materials) [E5.37a | E5.37b].



Recovery operations [E5.37a   E5.37b   E5.37c]	2025			2024		
	Hazardous [E5.39]	Non- hazardous	Total waste generated [E5.37a]	Hazardous [E5.39]	Non- hazardous	Total waste generated [E5.37a]
<b>Aggregates</b>						
Preparation for reuse	–	–	–	–	–	–
Recycling	35.51	177.72	213.23	37.68	6 704.40	6 742.08
Other	1.079	2.024	3.10	2.06	10.68	12.74
<b>Cement</b>						
Preparation for reuse	194.92	–	194.92	85.91	3.45	89.36
Recycling	15.14	3 161.14	3 176.28	10.44	9 607.63	9 618.07
Other	164.6508	2 466.28025	2 630.93	161.31	2 179.94	2 341.25
<b>Concrete</b>						
Preparation for reuse	1.64	–	1.64	1.25	–	1.25
Recycling	5.40	68 079.22	68 084.62	2.30	54 610.41	54 612.71
Other	22.33	6 798.456	6 820.79	24.61	8 806.55	8 831.16
<b>Mortars / Hydraulic lime</b>						
Preparation for reuse	0	–	–	–	–	–
Recycling	–	625.57	625.57	–	540.98	540.98
Other	5.16	0	5.16	2.57	–	2.57
<b>Other construction materials</b>						
Preparation for reuse	0	0	–	–	–	–
Recycling	–	–	–	–	–	–
Other	–	–	–	–	–	–
<b>Total waste recovered</b>	<b>445.83</b>	<b>81 310.41</b>	<b>81 756.25</b>	<b>328.13</b>	<b>82 464.04</b>	<b>82 792.17</b>

Note: For the totals presented in the tables above relating to resource outflows, including the total of hazardous and non-hazardous waste, the following assumptions were made for recovery operations: other recovery operations (outside and inside our facilities), preparation for reuse (outside and inside our facilities), and recycling (outside and inside our facilities).

On the other hand, the table below presents only the total waste generated, broken down into hazardous and non-hazardous waste, from all recovery and disposal operations.

Operations [E5.37a   E5.37b   E5.37c]	2025			2024		
	Hazardous [E5.39]	Non- hazardous	Total waste generated [E5.37a]	Hazardous [E5.39]	Non- hazardous	Total waste generated [E5.37a]
Aggregates	36.589	181.474	218.06	60.76	6 716.08	6 776.84
Cement	545.4778	5 955.98	6 501.46	383.58	12 035.21	12 418.79
Concrete	33.39557	74 891.45	74 924.84	48.67	64 383.93	64 432.60
Mortars / Hydraulic lime	6.65	625.57	632.22	2.72	540.98	543.70
Other construction materials	–	–	–	–	–	–
<b>Total</b>	<b>622.11</b>	<b>81 654.47</b>	<b>82 276.59</b>	<b>495.73</b>	<b>83 676.20</b>	<b>84 171.93</b>



The methodology used for the calculation is based on direct measurements carried out using duly calibrated equipment existing at the industrial complexes, with the information recorded on an electronic platform in the case of Portugal and Brazil and, in the case of the other geographies, through records maintained by the entities. For the totals presented in the tables above, relating to resource outflows, including the total hazardous and non-hazardous waste, the following assumptions were considered for recovery operations: other recovery operations (off-site and on-site), preparation for reuse (off-site and on-site) and recycling (off-site and on-site) [E5.40 | ESRs 2.77a].

### **E5-6 – Anticipated financial effects from material physical and transition risks and potential opportunities related to resource use and circular economy**

In accordance with Appendix C of ESRs 1, Secil has opted not to report information on the anticipated financial effects of impacts, risks and opportunities related to resource use and circular economy in this reporting year.



### 3.1.3. Informação social

### 3.1.3.1. ESRs S1 – Own Workforce

#### As nossas pessoas

In 2025, the Human Resources (HR) area continued its journey towards the objective of the strategic cycle Ambition 2025 – Sustainable Growth, to be the employer of choice for the people it seeks to attract, develop and retain in order to grow and operate with excellence. Reflecting this path, the company was recognised by Human magazine as one of the 30 best companies to work for in Portugal.

#### STRATEGY

#### SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with strategy and business model

Description	Impact, Risk or Opportunity	Time horizon	Position in value chain	Related sub-topic or sub-sub-topic
[ESRS2.48a]	[ESRS2.48a; S1.14d]	[ESRS2.48ciiii]	[ESRS2.48a]	
<b>Health, safety and well-being</b>				
Shift work impacts quality of life and physical and mental health.	Negative impact	-	Own operations	Working time
Work-life balance contributes to employees' health and well-being.	Positive impact	-	Own operations	Work-life balance
Occupational accidents or occupational diseases lead to fatalities, injuries or other health conditions.	Negative impact	-	Own operations	Health and safety
Failure to comply with occupational health and safety rules and procedures negatively affects workers' health and safety.	Negative impact	-	Own operations	Health and safety
<b>Talent retention and organisational engagement</b>				
The promotion of social dialogue between management and workers' representatives facilitates greater worker involvement regarding common interests, which may impact workers' conditions.	Positive impact	-	Own operations	Social dialogue
The promotion of social dialogue between management and workers' representatives facilitates greater worker involvement regarding common interests, which may impact workers' conditions.	Positive impact	-	Own operations	Freedom of association, existence of works councils and workers' information, consultation and participation rights
The payment of attractive salaries (monetary benefits) and the granting of non-monetary benefits promotes employee satisfaction.	Positive impact	-	Own operations	Adequate wages
The payment of attractive salaries (monetary benefits) and the granting of non-monetary benefits promotes employee satisfaction, enhancing retention and productivity.	Opportunity	Short-term – Reporting year	Own operations	Adequate wages

Description	Impact, Risk or Opportunity	Time horizon	Position in value chain	Related sub-topic or sub-sub-topic
<b>[ESRS2.48a]</b>	<b>[ESRS2.48a; S1.14d]</b>	<b>[ESRS2.48ciii]</b>	<b>[ESRS2.48a]</b>	
Greater bargaining power for workers covered by collective bargaining agreements.	Positive impact	-	Own operations	Collective bargaining, including the rate of workers covered by collective agreements
Promoting open communication between employers, employees and their representatives results in fairer and safer working environments, increased worker satisfaction and greater productivity.	Opportunity	Medium-term – Between the reporting year and up to 5 years	Own operations	Social dialogue
Collective bargaining, combined with workers' satisfaction with salaries and benefits, may prevent strikes, business disruption and result in financial gains.	Opportunity	Short-term – Reporting year	Own operations	Collective bargaining, including the rate of workers covered by collective agreements
<b>Promotion of Equity and Diversity</b>				
We ensure equal pay for equal work in the geographies where we operate.	Positive impact	-	Own operations	Gender equality and equal pay for work of equal value
Lack of gender representation and age diversity creates less inclusive and equitable environments, reducing innovation and the sense of belonging.	Negative impact	-	Own operations	Diversity
<b>Continuous Development and Empowerment</b>				
Workforce empowerment and continuous skills assessment contribute to employees' professional and personal growth.	Positive impact	-	Own operations	Training and skills development
The promotion of training actions that enhance employee development may increase motivation and productivity.	Opportunity	Short-term – Reporting year	Own operations	Training and skills development
Training and skills development in sector-specific matters enhance talent attraction and retention and differentiate the company within its sector.	Opportunity	Short-term – Reporting year	Own operation	Training and skills development

Note: The material impacts identified are actual and therefore do not have an associated time horizon..

The material risks and opportunities identified cover the workforce of Secil's own operations [S1.16], and the material impacts identified within the topic of own workforce do not result from transition plans aimed at reducing negative environmental impacts [S1.14e | S1.14f | S1.15].

Secil recognises that its strategy and business model have a direct impact on employees, as the decisions taken and practices adopted promote or affect the conditions provided to its workforce. Therefore, social dialogue is prioritised as part of Secil's commitment to employee well-being, aligning management practices, among others, with the needs and concerns of the workforce. Regular meetings with trade unions and workers' representatives to negotiate working conditions and benefits reinforce organisational cohesion and are one of the ways in which Secil materialises this commitment.



Secil is focused on increasing employee satisfaction and motivation through the adoption of well-being promoting policies that foster flexibility, such as the Flexwork Policy, as well as support for employees at different stages of life. Secil provides benefit programmes, such as health insurance and medical support services that go beyond occupational medicine, as well as parental support. These reflect the care it has for its people.

Additionally, Secil is committed to improving the qualifications of its direct employees through investment in continuous training and professional development programmes. Secil's strategic vision of providing a fair and inclusive working environment, while ensuring pay equity, is reflected in the annual remuneration management process and the periodic review of salary structures, in order to eliminate internal inequities of any nature. The Group, being aware that its business model, by its nature, favours the concentration of employees in technical areas historically dominated by men, thereby limiting diversity, established partnerships with technical schools as a way of attracting female employees. Additionally, it reviewed recruitment policies to include more female candidates and promoted awareness-raising actions aimed at fostering inclusion [S1.13a | S1.13b].

Secil is aware that its sector has inherent risks and that the industrial nature of its operations implies increased occupational risks. The Group seeks to mitigate these in several ways, namely through the Health and Safety Policy, based on the ambition of "Zero Harm, for employees, contractors and communities", safety training programmes and rigorous monitoring of working conditions, which significantly reduce these risks. In addition, each accident is thoroughly analysed in order to identify causes and prevent recurrence.

In addition, training programmes such as "Leading with Safety" empower employees and leaders to prioritise safety and implement continuous improvements, aiming to limit possible deviations in compliance with safety rules and procedures, which could result in incidents such as accidents or avoidable risk situations. For this reason, continuous training on these matters, together with rigorous monitoring, aims to strengthen the safety culture and ensure compliance with the rules.

Some areas of Secil require continuous operations, which are ensured through shift work and impact the quality of life of its people. This is a systemic or widespread impact, as shift work is common in the cement industry. The Secil Group seeks to mitigate these impacts not only through social dialogue regarding working hours adjustments, shift rotation and regular breaks, but also by encouraging practices that promote health and well-being.

The company's workforce is composed of different types of direct employees who may be materially impacted by the organisation's operations, namely salaried employees with a direct contractual relationship with the company, covering administrative, technical, operational and management functions. Self-employed workers, namely independent service providers who collaborate directly with the company in specialised areas or specific projects, and workers supplied by third-party companies, namely temporary workers or workers provided by employment agencies, generally allocated to short- or medium-term operational or administrative functions, are covered as workers in the value chain and will be addressed in that context (Chap. 3.1.3.2) [S1.14a].

Secil's strategy and business model have an impact on its own workforce. Most of the material opportunities and impacts related to the workforce are integrated into the Social (S) pillar of the sustainability framework (Chap. 3.1.1.3), a pillar that reflects Secil's commitment to ensuring safe working conditions, promoting employee well-being, ensuring inclusive practices and strengthening relationships with stakeholders [SBM-3 | S1.13a | S1.13b].

All direct employees within the company's own workforce who may be materially affected by the company's operations or value chain are included within the scope of the disclosures, in line with the comprehensive and inclusive approach adopted in the management and monitoring of workforce-related impacts, ensuring that both salaried employees and self-employed workers, as well as workers contracted through labour supply companies (as defined by NACE code N78), are covered by the materiality assessments and corresponding disclosures [SBM-3 | S1.14 | S1.14b | S1.14c].



Secil understands that certain groups of employees may be more vulnerable to specific risks due to their personal characteristics, working context or the nature of their activities, and therefore adopts measures to mitigate negative impacts and ensure the safety and well-being of all [S1.15]. However, it also considers that, since forced labour and child labour are regulated nationally in each geography where it operates, it does not have operations with a significant risk of forced labour [S1.14e | S1.14f | S1.14g | S1.15].

### **S1-2 – Processes for engaging with own workforce and workers' representatives about impacts**

Secil values the perspectives of its employees and actively integrates their contributions into decisions and activities aimed at managing actual material impacts on its workforce. This commitment is demonstrated through various practices and policies that promote two-way communication and employee involvement in decision-making processes [S1.12].

#### **Internal Communication as a Strategic Tool**

Internal communication at Secil is considered an essential enabler for the execution of the business strategy. Recognising the geographical and cultural diversity of its teams, the company implements close and participatory communication, where employees play a leading role. This is achieved through:

- a) **Climate Surveys (eNPS):** every two years, a climate survey is carried out to gather feedback from our people regarding the perceived organisational climate, followed by the development of action plans together with the teams. In the intervening years, a Pulse survey is conducted, consisting of a shorter survey carried out with a sample of the workforce, serving as a pulse check on employee satisfaction in the years when organisational climate surveys are not conducted.
- b) **InfoLeader:** A newsletter aimed at leaders, providing first-hand information to prepare them for communication with their teams.
- c) **Information Screens and Global (bilingual) and Local Newsletters:** Use of various channels to ensure that information reaches all employees, regardless of their location or function.
- d) **Town Hall Meetings:** Quarterly live broadcasts where safety results, business performance and strategic updates are presented, promoting transparency and alignment.

These initiatives ensure that employees are informed and have the opportunity to share their views, contributing to company decisions.



## Local Communities as Partners

Secil is committed to creating value for the communities where it operates, including its own workforce, through:

- e) Job Creation and Local Hiring: Promotion of employment opportunities that value local talent and contribute to community development.
- f) Community Engagement: Initiatives that encourage the active participation of its own employees in community projects, reinforcing the sense of belonging and social responsibility.

## Integration of Employees' Perspectives

There are other practices that promote two-way communication, in addition to those already mentioned, namely regarding the integration of employees' perspectives, including those in vulnerable situations, namely:

- g) Internal Communication and Active Participation: Secil promotes internal communication, recognising the geographical and cultural diversity of its teams. The company uses multiple channels to ensure that all employees, regardless of their location or role, have access to information and opportunities for participation. This includes newsletters, information screens, face-to-face meetings and training sessions. These initiatives allow employees to share their opinions and concerns, contributing to company decisions.
- h) HR proximity: Informative sessions and open forums for employee questions, held monthly at the company's operational sites in Portugal [S1.28].

The points described above reflect the Secil Group's commitment to considering the perspectives of its employees in its decisions and activities, promoting an inclusive and responsible working environment [S1.27 | S1.27c]. Dialogue with employees may take place either through workers' representatives, via workers' committees, or directly with employees themselves, as occurs in the climate survey process [S1.27a | S1.27c]. In terms of frequency, meetings with workers' committees take place monthly [S1.27b], while dialogue with national workers' representative organisations occurs annually, or whenever it is necessary to establish a specific agreement related to a particular topic. On the other hand, climate surveys are conducted every two years and, in the intervening years, a Pulse survey is carried out, consisting of a shorter survey conducted with a sample of the workforce, serving as a pulse check on employee satisfaction in years when organisational climate surveys are not conducted [S1.27b].

Mechanisms have been implemented to assess the effectiveness of engagement with employees, ensuring that workforce perspectives are considered in the company's decisions and activities, such as the action plans resulting from organisational climate surveys, monitoring of the eNPS (employee Net Promoter Score) target, and the Systematic Stakeholder Dialogue Process. Within the scope of the commitments for 2020–2030, Secil established the target of implementing a systematised dialogue process with the various stakeholder groups, including employees. This commitment aims to ensure that employees' opinions and concerns are regularly gathered and considered in business decisions. In addition, there is continuous assessment and improvement of social dialogue, resulting from the recognition of the importance of continuously monitoring and improving the effectiveness of this dialogue. This reflects Secil's commitment to alignment with international best practices, which recommend regular assessments of the impact of social dialogue institutions on socioeconomic decisions, as a reflection of a proactive approach to the assessment and continuous improvement of the effectiveness of dialogue with employees [S1.27e | S1.28].

Secil adopts a proactive approach to understanding the perspectives of its employees, including those who may be particularly vulnerable or marginalised. It implements various measures to ensure that the voices of all employees are heard and considered in its decisions and activities. In addition to the practices mentioned above, there is also a Human Resources Business Partner (HRBP) function, which ensures close proximity to leaders and their respective teams, enabling the understanding, assessment and support of employees' different perspectives [S1.28].

### **S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns**

Secil adopts a proactive approach to remediating negative impacts that may affect its own workforce, ensuring that its employees have structured processes in place to mitigate and remedy adverse impacts.

Secil structures its approach to mitigating and remediating adverse impacts through preventive and corrective measures, in accordance with its Human Rights Policy and international best practices [S1.27d | S1.32a].

Secil recognises the importance of ensuring that its employees are aware of and confident in the available channels for expressing concerns or needs, adopting practices that promote effective internal communication and employee protection. As such, it adopts practices that reinforce this commitment, such as the Secil Group Integrity Channel Policy. The Integrity Channel is a confidential platform accessible to all employees, through which they may report situations of non-compliance, harassment, discrimination, human rights violations, and breaches of the company's principles and commitments, with investigation and possible corrective action being ensured. This Channel is governed by the Integrity Channel Policy (Chap. 3.1.4.1), which includes whistleblower protection measures, namely the guarantee of anonymity when requested by the whistleblower, confidentiality in the handling of reports, and protection against retaliatory acts [S1.32b | S1.32e | S1.33].

This channel reinforces the company's commitment to ensuring effective mechanisms for communicating concerns. Secil also encourages direct dialogue with leadership and HR [AR30 | S1.32d | S1.32c | S1.32e | S1.33].

Whenever it is identified that the company has caused or contributed to a material negative impact, corrective actions are assessed in order to prevent recurrence and ensure remediation of damages. Measures may include adjustments to labour policies, reinforcement of safety practices, fair compensation or revision of internal procedures. In addition, we have established monitoring and continuous improvement processes that make it possible to assess the effectiveness of the measures implemented, ensuring that they result in real and effective change for employees. These processes include internal audits, collection of employee feedback and regular reviews of labour policies [S1.32a].

Secil developed measures and actions aimed at addressing the material impacts identified in its own workforce. These may be grouped into the categories below:

- 1) Health, Safety and Well-being;
- 2) Talent Development.

## I. Health, safety and well-being

### MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES – HEALTH, SAFETY AND WELL-BEING

#### S1-1 – Policies related to own workforce

At Secil, there is a set of policies related to its own workforce that are transversal to the Group’s activities and intended to structure its approach. These include the Human Rights Policy, the Code of Conduct, the Sustainability Policy, the Stakeholder Engagement Policy and the Health and Safety Policy, which is applied across the Secil Group in all geographies where it operates [ESRS 2.65b].

In the definition of the Health and Safety policies, both internal and external stakeholders were involved, namely regulatory entities, workers’ representatives or trade unions, legal advisers and health and safety consultants [ESRS 2.65e].

#### Policies

Document	Health and Safety Policy
<b>[S1-19 and ESRS 2.65a]</b>	
<b>Key contents and objectives</b> [ESRS2.65a]	The Health and Safety Policy is based on 5 pillars: Leadership, Operational Safety, Management Systems, Communication and Training. It aims for the highest level of awareness, promoting the continuous improvement of its processes through the implementation of an effective management system and strong leadership. In its commitment to zero harm for employees, contractors and communities, all employees are trained to perform their work in the safest possible manner, with each individual being accountable for adopting safe behaviour in all activities.
<b>Scope</b> [ESRS2.65b]	Covers the entire value chain, impacting members of governing bodies, committee members, Secil employees and representatives. Covers all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Group CEO and the respective Geography CEOs (Country CEOs).
<b>Availability</b> [ESRS2.65f]	Communicated to all employees, contractors and subcontractors, managers and supervisors, customers, suppliers, trade unions, local communities and through publication on the website.

The above-mentioned policy is part of Secil’s strategy for the prevention of occupational accidents [ESRS 2.23], and addresses the Health and Safety Standard ISO 45001 [ESRS 2.65d] and the IROs identified in this context, namely quality of life and physical and mental health in shift work, occupational accidents or occupational diseases leading to fatalities, injuries or other illnesses, and non-compliance with occupational health and safety rules and procedures.

This Health and Safety Policy clearly reflects the Secil Group’s commitment to achieving zero harm for its employees, contractors and communities.

In line with this commitment, adaptations were made to the physical environment in order to ensure the health and safety of employees, customers and other visitors with disabilities. An example of this is the modernisation of its facilities, namely sanitary facilities, and other adaptations, including the installation of accessible resources, wider doors to allow wheelchair access, support bars near toilets and sinks for greater safety, lower sinks and mirrors to ensure usability for individuals in wheelchairs, and non-slip flooring to reduce the risk of falls for people with reduced mobility. Motion sensor taps and soap dispensers were also installed to eliminate the need for manual operation, ensuring hygiene and convenience. These adaptations are carried out in accordance with the organisation’s broader commitment to promoting an inclusive and safe environment for all people [AR17d].

The following information is incorporated by reference to other sections of the non-financial statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Human Rights Policy – Chap. 3.1.4.1, G1
- Code of Conduct – Chap. 3.1.4.1, G1
- Sustainability Policy – Chap. 3.1.4.1, G1
- Stakeholder Engagement Policy – Chap. 3.1.4.1, G1.

## ACTIONS AND RESOURCES – Health, safety and well-being

### S1-4 – Taking action on material impacts on own workforce and approaches to mitigate material risks and pursue material opportunities related to own workforce, and the effectiveness of those actions

The implementation of a set of actions in the area of health and safety aims to address the material impacts identified, namely avoiding non-compliance with occupational health and safety rules and procedures and preventing occupational accidents or occupational diseases, in order to achieve the objectives and targets of the Health and Safety Policy, promoting a structured, responsible and proactive safety culture.

Among the main topics of the Human Resources strategic agenda in the area of health, safety and well-being, those related to the Safety Framework and continuous training and development stand out.

#### Actions

	Main actions	Status	Scope of the action	Time horizon	Results / Expected effects
	[ESRS 2.68a]	[ESRS 2.68e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
<b>Safety framework</b>					
1	Global external assessment of the Safety Framework	Completed	All geographies	Short-term	Results of the Group's external assessment: between 3 and 4.
2	External assessment of two priority elements of the Safety Framework.	Adopted	All geographies	Ongoing	Results are presented in the health and safety targets and metrics table.
<b>Health and Safety Continuous Training and Development</b>					
3	LOV Training Programme – Visible Operational Leadership:  Conduct Visible Operational Leadership training in Safety for all leaders	Completed	All geographies	Short-term	Acquisition of new knowledge. Empowerment of leaders to promote open communication, enabling them to promptly address incidents and support affected people. Improved ability to investigate root causes and effectively implement corrective actions, minimising the likelihood of similar events.
4	Technical training for the safety team	Adopted	All safety teams across the geographies	Ongoing	Completion of the 2025 technical and behavioural training. Continuous training to improve skills related to safety topics.
<b>Safety Roadmap</b>					
5	Safety Roadmap. Update and monitor the implementation of the Strategic Safety Plan	Adopted	All geographies	Ongoing	Organised plans and respective monitoring in each geography.

Within this Health and Safety topic, we highlight the actions taken, planned or underway to mitigate or remediate material negative impacts on the own workforce [S1.38a]:

#### Action 1 and 2 – External Assessment of the Safety Framework and Monitoring of its KPIs



- The Safety Framework is intended to serve as the internal reference point for assessing the safety culture, starting from the current state and defining the objectives for excellence in safety practices.
- It is composed of 37 elements, which are safety topics such as working at heights, safety dialogues, hazard identification and risk assessment, and training. All these elements have a corporate procedure to be followed, namely the rules to be implemented and the expected outcomes to be achieved. Each element includes a set of questions categorised into three phases: Development, Implementation, and Sustainability and Results. These phases help assess the progress of each element in terms of its implementation and effectiveness. As the questions are answered, each element receives an achievement percentage, which is then classified into one of five categories: 1 - Not Implemented, 2 - Basic, 3 - Good, 4 - Excellent and 5 - Sustainable. This structured approach enables Secil to clearly assess the level of safety maturity across different areas and identify opportunities for improvement, ensuring continuous progress towards safety excellence [S1.46 | ESR2.80f | 2.77a].
- In 2024, a self-assessment of all the elements of the Framework was carried out, and in 2025 this assessment was conducted by an external consultant. The priority elements considered in 2024 were LOTOTO (Lock Out, Tag Out and Try Out) and another element chosen by each geography. In 2025, the two priority elements were the Visible Operational Leadership in Safety programme and the implementation of the Work Equipment Inspection procedure.

#### Action 3 and 4 – Continuous Training and Development

- **Action 3:** Conduct training on “LOV – Visible Operational Leadership in Safety” for all leaders, equipping them with the skills required to model and reinforce safe behaviours;
- **Action 4:** Provide specialised technical safety training for the safety team, enhancing their ability to effectively address operational risks.

#### Action 5 – Safety Roadmap. Strategic Plan and Annual Monitoring

- Since 2017, Secil has implemented a Safety Roadmap across all geographies where it operates. This global tool unifies the Group’s occupational health and safety strategy, with common and specific actions for each location. The Roadmap aims to ensure that health and safety matters are prioritised and implemented systematically, improving communication and the dissemination of these topics.
- The Safety Roadmap is a strategic safety plan. It is currently in its second cycle, 2021–2025: definition of the safety plan with annual detail, monitored monthly for each geography to ensure consistent progress and alignment with safety objectives. Safety and management follow-up takes place in quarterly global meetings for updates, sharing of best practices and resolution of major challenges, fostering the exchange of learnings between geographies. There are also monthly meetings between the safety managers of all geographies to monitor implementation, share knowledge, updates and best practices [2.68d].
- The established Safety Roadmap is regularly updated based on real-time feedback and the results achieved. It enables the monitoring of progress and consistency in alignment with policy objectives and the continuous reduction of priority risks [ESRS 2.68e].

These 5 actions, together, demonstrate the commitment to promoting a proactive, collaborative and excellence-oriented safety culture throughout the organisation [S1.38a], aimed at addressing safety risks, improving the safety culture and enhancing both technical and behavioural practices at all levels [S1.38b].

The actions aim to prevent, cooperate with or support people harmed by the actual material negative impacts resulting from the Secil Group’s activities, identified through the double materiality process. Collectively, they resulted in strengthened trust, improved incident response and a more resilient safety culture [2.68d].

The improvements in safety behaviours and risk mitigation efforts within the components identified in the “Safety Framework” are measurable through the defined KPIs. Leaders and employees at all levels have actively participated in the implemented initiatives and training sessions, reporting greater confidence and reinforcement of safer practices, which has resulted in greater engagement with safety and the provision of constructive feedback in daily operations [ESRS 2.68e].

In order to identify the necessary and appropriate actions in response to actual or potential negative impacts on its workforce, Secil uses a structured set of processes. In identifying actions aimed at these actual or potential negative impacts, proactive assessments, collaborative engagement and continuous improvement mechanisms are combined.

In the case of health and safety, the main processes include:

- 1) Risk Assessments and Incident Analysis: Regular risk assessments are carried out to identify hazards and potential risks to the workforce;
- 2) Collaboration between Departments and Units: These allow the exchange of ideas, identification of weaknesses and development of targeted solutions. Employees at all levels are encouraged to share their insights on what is working well in safety practices, the challenges they face and the improvements they would like to see implemented;
- 3) Employee Feedback and Suggestion Channels;
- 4) Root Cause Analysis: When incidents or near misses occur;
- 5) Training and Awareness Programmes: Based on the gaps or negative impacts identified.

The safety team enhanced its technical capabilities, enabling faster identification of root causes and more effective implementation of corrective measures, reducing incident resolution time. In 2024, collaboration with the external consultant brought new perspectives and highlighted areas for specific improvements. Initial feedback suggests increased team participation and alignment with safety initiatives, as well as the strengthening of response processes to material impacts [ESRS 2.68e].

Budgeting across the geographies is carried out through the annual submission of financial budget proposals by the safety departments and corporate team for their planned initiatives. These are analysed and approved by management following a process of discussion and assessment. We contracted general sustainable financing facilities linked to sustainability KPIs, two of which are LTIR (Lost Time Injury Frequency Rate) and the percentage of women in the total workforce. This information is detailed in the “sustainability linked-financing” document available on the website [2.69a | 2.69b].

In addition to internal processes, Secil seeks to continuously improve its health and safety practices through participation in industry associations, such as the GCCA (Global Cement and Concrete Association); involvement in safety committees, through which it gains valuable insights into best practices; and the use of external safety specialists and consultants. These partnerships contribute to incorporating proven strategies and methodologies, ensuring alignment with industry standards and developments in safety regulation.

All these measures taken, underway or planned aim to address the actual material impacts on the Secil Group workforce, as already detailed [2.38b].

## METRICS AND TARGETS – Health, safety and well-being

### S1-5 – Targets related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities

Secil is committed to the responsible management of health, safety and well-being topics, which is materialised through two objectives and targets defined within this context [ESRS 2.80c].

Secil’s Safety system incorporates safety practices that not only protect the workforce, but also align with broader environmental, social and economic objectives. Through its comprehensive framework—including leadership, training, operational safety, management systems, and communication and reporting—the system ensures that Secil’s safety initiatives are both sustainable and adaptable to local conditions. In this way, a safety culture is promoted that encourages the proactive identification and mitigation of risks. Additionally, this system supports long-term health and well-being (aligning with SDG 3: Good Health and Well-being) and promotes responsible operational practices that minimise environmental impact and resource waste (SDG 12: Responsible Consumption and Production). Furthermore, the focus on continuous improvement, transparency in communication and learning across sites ensures that local challenges are addressed while driving progress towards sustainability at organisational and community levels.

#### Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
[ESRS 2.80b]	[ESRS 2.80d]	[ESRS 2.75] ESRS 2.80b]	[ESRS2.80J]	[ESRS2.80J]	[ESRS 2.80b   ESRS 2.80e]
Reduce the accident frequency rate	<b>Baseline value:</b> 7,5 <b>Base year:</b> 2020	Accident frequency rate	6.8	6.3	3.8
Implementation of 2 priority elements of the Safety Framework per year	<b>Baseline value:</b> N/A <b>Base year:</b> 2024	% implementation of the 2 Safety Framework elements	Tunisia= 64% Brazil=97% Lebanon=68% Portugal=61% <sup>17</sup>	Tunisia=52,2% Brazil=61,32% Lebanon=62,08% Portugal=51,42%	Achieve at least 65% implementation of the two elements in all geographies.

The targets defined for the own operations of the entire Secil Group involved internal stakeholders and have not been changed since the period in which they were established. In the case of the stakeholder engagement plan, the impact is reflected across the entire value chain [ESRS 2.80c | 2.80g | 2.80h | 2.80 | S1.46].

These defined targets aim to monitor the material impacts related to Health and Safety.

In the case of the **accident frequency rate (FR)**, it is a reactive indicator, but one that clearly reflects Secil’s focus on ensuring improvements arising from the implemented initiatives and targeted training programmes, as well as the support of external consultants, which have materialised in its successive reduction over the last three years [S1.46 | ESRS 2.80f | ESRS 2.77a].

<sup>17</sup> These values are the result of the self-assessment of the implementation of the two priority framework elements in 2024. The elements considered in 2024 were LOTOTO (Lock Out, Tag Out and Try Out) and another element selected by each geography.



The targets defined for Health and Safety take into account the broader context of sustainable development and the local situation in which the company's impacts occur. In the case of the target to reduce the accident Frequency Rate (FR), it supports sustainable development by prioritising safer workplaces, reducing accident-related disruptions and aligning with the local context of promoting well-being and economic stability in the communities impacted by the company [S1.46 | ERS2.80f].

Although this is a common metric used to measure the frequency of workplace incidents or accidents in relation to the amount of work performed, it has limitations, as it does not take into account the severity of incidents, nor does it capture near misses, which may provide important information on safety. In addition, variations in reporting practices, underreporting and the inability to provide context or reflect all worker risks may compromise accuracy and comparability between organisations.

It is frequently expressed as the number of incidents (such as injuries or accidents) per million hours worked and helps assess an organisation's safety performance and monitor trends over time [ESRS 2.75 | ERS2.77a].

In the case of the **Safety Framework**, the two elements implemented in 2025 were the **Visible Operational Leadership in Safety Programme** and the implementation of the Work Equipment Inspection procedure. Both contribute to the implementation of the Health and Safety Policy and to achieving "Zero Harm" for own employees, contractors and communities [S1.46 | ERS2.80a].

The % implementation of the 2 Safety Framework elements allows the assessment of the maturity of the implementation of the safety element or topic. No interim targets were developed, resulting from a management decision based on the metric baseline [S1.46 | ERS2.80e | 2.80f].

The implementation of the **Work Equipment Inspection** procedure consists of four safety procedures aimed at ensuring that concrete assets, steel structures, equipment and machinery, as well as walkable platforms, are subject to a first-level inspection to verify that they are in safe operating condition. After each inspection, a formal report is issued identifying any critical areas requiring immediate corrective action. These first-level inspections are also integrated into the preventive safety programmes of each industrial unit.

The **Visible Operational Leadership in Safety Programme** consists of a full-day training initiative aimed at leaders, with the objective of reinforcing their responsibility for team safety and their role in promoting and leading safety practices. Upon successful completion of the programme, leaders are certified and become formally accountable for the safety performance of their respective teams.

The methodology for integrating the Equipment Inspection and Safety Leadership Programmes into safety KPIs is based on verifying compliance with the defined requirements for each element. This includes indicators such as the percentage of inspected equipment and assets and the number of trained leaders. However, this approach presents limitations, including the risk of prioritising quantitative metrics over qualitative outcomes, variability in task complexity and difficulties in consistently assessing effectiveness and the degree of implementation [ERS2.77a | ERS2.77c].

Within the scope of these Safety Framework elements, maturity assessments are jointly conducted by an external safety consultant and the Group Safety Manager, in collaboration with the operational teams. The external consultant and the Group Safety Manager guide, monitor and review the assessment results in order to ensure alignment. Based on these discussions, recommendations are developed for each geography with the aim of identifying gaps and establishing a five-year roadmap to meet the framework requirements. The results are also presented to Secil's Executive Committee for analysis and approval [S1.47 | S1.46 | ERS2.80f].

## Performance against targets

Performance against safety targets is monitored through a structured approach, involving monthly meetings with the geographies for follow-up, weekly meetings to address specific issues, annual site visits conducted by the Group Safety Manager, monthly meetings to share results with Group management, including the geography CEOs, and quarterly meetings for Group management and safety teams to share updates, learnings and improvements. As this target is a commonly used KPI in this area, it is externally validated and audited [ERS2.77b].

## S1-14 – Health and safety metrics

An Occupational Health and Safety Management System (OHSMS) is implemented in accordance with ISO 45001 across all geographies. Although Brazil does not hold the certification, it implements the OHSMS in accordance with ISO 45001. The system covers 100% of the Group's employees and businesses.

[S1.88a]

	<b>Percentage of employees covered by a health and safety management system</b>	<b>2025</b>	<b>2024</b>
S1-14-001	Workforce	100 %	100 %
S1-14-002	Employees	100 %	100 %
S1-14-003	Non-employees	100 %	100 %

[S1.88c]

	<b>Number of recordable work-related accidents</b>	<b>2025</b>	<b>2024</b>
S1-14-017	Workforce	58	62
S1-14-018	Employees	33	39
S1-14-019	Non-employees	25	23

During the reporting period, no fatalities were recorded in Secil's operations.

[S1.88b]

[S1.88c]

	<b>Number of days lost to work-related injuries and fatalities due to work-related accidents, work-related ill-health and fatalities from illness</b>	<b>2025</b>	<b>2024</b>
S1-14-018	Employees	1 899	1 990
S1-14-019	Non-employees	922	880

The number of days lost due to work-related injuries and fatalities resulting from work-related accidents does not include work-related ill health in the case of employees and non-employees.

[S1.88c]

	<b>Work-related accidents (per 1.000.000 hours)</b>	<b>2025</b>	<b>2024</b>
S1-14-018	Employees	6.00	7.96
S1-14-019	Non-employees	6.80	5.52
	Workforce	6.30	6.84



## II. Talent Development

### MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES – Talent Development

#### S1-1 – Policies related to own workforce

This topic is framed by the **Human Rights Policy**, the **Code of Conduct**, the **Sustainability Policy** and the **Stakeholder Engagement Policy** (detailed in Chap. 3.1.4.1), as well as the **Flexwork Policy**.

The **Code of Conduct** frames and guides the behaviour of all Secil employees, establishing high standards of business ethics and personal integrity in the performance of their activities. The **Sustainability Policy** reflects the commitment to talent, equal opportunities and employee diversity, promoting merit and fair and equitable remuneration. The **Stakeholder Engagement Policy** aims to demonstrate recognition of and commitment to various stakeholders, namely employees.

Through the **Human Rights Policy**, Secil establishes a strong and clear commitment to Human Rights, aligned with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises [S1.20 | S1.21]. Through these guiding principles, which direct Secil's actions in compliance with applicable laws and regulations, respect for Human Rights and labour rights is ensured across all Group operations. These principles include Freedom of Association and Collective Bargaining, elimination of discrimination, prevention of harassment, promotion of equal opportunities and the valuing of diversity and inclusion, which are fundamental principles for ensuring a respectful, safe and inclusive working environment for all employees. Secil adopts a zero-tolerance approach towards any form of discrimination, whether based on ethnic or racial origin, colour, sex, sexual orientation, gender identity, disability, age, political beliefs, nationality, social origin or any other factor [S1.24b], and is committed to ensuring equal opportunities for all employees [S1.24a]. This policy explicitly addresses the issues of human trafficking, forced or compulsory labour and child labour, ensuring that such practices are not tolerated in any part of its value chain [S1.22].

In addition to the definition of the Human Rights Policy, there are specific mechanisms to ensure that discrimination is prevented [S1.24d], detected and corrected. In this regard, regular training on workplace harassment is provided and awareness-raising actions are carried out on the relevant topics. Furthermore, Secil is committed to continuously monitoring the impact of its diversity, inclusion and anti-discrimination practices, ensuring that its principles are respected.

The detection of cases where discrimination occurs is ensured through the availability of the **Integrity Channel** (Integrity Channel Policy detailed in Chapter 3.1.4.1). Their remediation is ensured through the serious and impartial investigation of all reports, guaranteeing protection for the victim and the application of corrective and remediation measures whenever necessary [S1.24d].

Secil has undertaken specific commitments related to inclusion and adopts positive action measures regarding people from groups particularly exposed to vulnerability risks within its own workforce. In addition to those already mentioned, it is worth highlighting the subscription to the Portuguese version of the CEO Guide to Human Rights of the World Business Council for Sustainable Development (WBCSD), through which it commits to promoting human rights issues in its operations and value chains. This commitment goes beyond risk management and legal compliance, seeking positive transformations in people’s lives and ensuring a safe, equitable and respectful working environment across all its operations. Secil has therefore assumed additional specific commitments regarding respect for Human Rights and Labour Rights at Group level, ensuring compliance with applicable legislation and regulations in the conduct of its activities. It also ensures freedom of association and collective bargaining, recognising the importance of constructive dialogue among all parties; diversity and equal opportunities, promoting an inclusive work environment free from discrimination and ensuring equal opportunities for all employees, regardless of personal or social characteristics; and a safe and healthy working environment, both physically and psychologically, providing continuous training and access to social protection schemes. Secil rejects all forms of child labour and forced labour, fully complying with International Labour Organization (ILO) conventions, and ensures respect for the communities where it operates by adopting measures to minimise negative impacts and promote their sustainable development [S1.24c].

## Policies

Document	Flexwork Policy
<b>[S1-19 and ESRs 2.65a]</b>	
<b>Key contents and objectives</b> [ESRS2.65a]	Aims to promote work-life balance, inspired by the organisational well-being and happiness standard.
<b>Scope</b> [ESRS2.65b]	Covers employees in Portugal.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Human Resources Department
<b>Availability</b> [ESRS2.65f]	Communicated to employees by email.

The **Flexwork Policy**, applicable only in Portugal, reinforces the commitment to more balanced, modern and people-centred working models. This policy establishes a clear and consistent framework for flexible working practices, promoting better time management, greater autonomy and a healthier work-life balance. By institutionalising this approach, Secil reinforces its ambition to build a resilient and attractive working environment, prepared for future challenges, where well-being and productivity coexist in a sustainable way.

The following information is incorporated by reference to other sections of the non-financial statement.

- Provisions contained in the Supplier Code of Conduct (AR13): Chap. 3.1.3.2
- resentation of the Code of Conduct, Human Rights Policy and Sustainability Policy (MDR-P, ESRs 2, §65 a/b/c/d/f): Chap. 3.1.4.1

## ACTIONS AND RESOURCES – Talent Development

### S1-4 – Taking action on material impacts on own workforce and approaches to mitigate material risks and pursue material opportunities related to own workforce, and the effectiveness of those actions

Secil aims to provide working conditions that foster a sense of belonging and commitment, bring management and the workforce closer together through dialogue, and promote attractive conditions that enhance employee satisfaction, particularly in terms of work-life balance [S1.38a | S1.38b].

The measures presented below aim to provide or enable solutions in relation to actual material impacts [S1.38b].

#### Actions

	Main actions	Status	Scope of the action	Time horizon	Results / Expected effects
No.	[ESRS 2.68a]	[ESRS 2.68e e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
<b>Talent Retention and Organisational Engagement</b>					
6	“Stay interviews” with high-potential employees (HiPo employees), conducted by the HRBP – Human Resources Business Partner team	Adopted	All geographies	Ongoing	Enable the collection of strategic feedback from high-potential employees, ensuring adjustments to internal practices to increase retention. Allow alignment of retention strategies and strengthen the company-employee relationship (Global).
7	Talent Acquisition: Establishment of a dedicated Talent Acquisition area, focused on a more strategic and business-oriented approach	Completed	All geographies	Short-term	Establishment of the dedicated area.
8	Implementation of a new recruitment process	Completed	All geographies	Short-term	Implementation of a more robust and consistent recruitment process, with structured criteria and assessment, ensuring greater rigour in the selection of the best profiles.
9	Organisational Climate: Conducting an organisational climate survey to measure employee satisfaction and identify opportunities for improvement, involving the entire workforce	Adopted	All geographies	Ongoing	2 288 employees surveyed; 2 105 responses; 92% participation rate.
10	Granting of short- and long-term bonuses: Short- and long-term bonuses promote employee motivation and loyalty, reducing voluntary turnover	Adopted	Portugal	Ongoing	Provision of short- and long-term bonuses. Alignment of individual performance with Secil’s strategic objectives.



No.	Main actions	Status	Scope of the action	Time horizon	Results / Expected effects
	[ESRS 2.68a]	[ESRS 2.68 e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
11	Employee Assistance Programme (EAP): Provision of specialised, confidential and fully free support to all employees and their immediate family members, offering psychological, social, legal and financial support 24 hours a day, 7 days a week, ensuring a rapid, human and tailored response to each situation.	Completed	Portugal	Short-term	Programme made available. Promotion of employee well-being and talent retention.
12	New way of work: Programme covering the implementation of Lean processes, agile methodology and training programmes aimed at promoting alignment and strengthening leadership.	In progress	Tunisia	Medium-term	More optimised processes and strengthened leadership.
13	HR Software: implementation of software that allows employees to access a set of services autonomously, more accurately and in real time.	Completed	Lebanon	Medium-term	Software implemented.
14	Secil Talks: Publication of the 2025 podcast season. Launched in 2024 on the external platforms YouTube and Spotify. Focuses on valuing employees' professional journeys.	Completed	Portugal	Short-term	Publication of 14 episodes in 2025.
<b>Promotion of Equity and Diversity</b>					
15	Review of the benefits package: Following the global Reward Management project, which assessed internal equity and external competitiveness of remuneration across the Group.	Completed	All geographies	Short-term	Increased internal equity, reduction of pay gaps.
16	Creation of the governance model for recruitment, ensuring alignment with equivalent positioning within the respective band.	Completed	Portugal	Short-term	Governance model created. Increased internal equity, reduction of pay gaps.
17	Creation of a compensation & benefits community to share indicators related to equity and salary competitiveness.	Adopted	All geographies	Ongoing	Increased internal equity, reduction of pay gaps.
18	Referral programme: higher rewards for those who refer women candidates.	Adopted	Brazil	Ongoing	Increase in the percentage of female employees in Brazil.
19	Employer branding campaigns (advertisements, social media posts, etc.) to ensure representativeness.	Adopted	Portugal	Ongoing	Increase in the percentage of female employees in Portugal.

**Continuous Development and Empowerment / Training and Development**

No.	Main actions	Status	Scope of the action	Time horizon	Results / Expected effects
	[ESRS 2.68a]	[ESRS 2.68 e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
20	Secil Academy – Partnership with online learning platforms to provide employees with autonomy to choose different courses available anytime and anywhere.	Adopted	Portugal	Ongoing	The following platforms were made available: Learning Hubz, available to all employees; Udemy, available to employees who need to accelerate development.
21	Secil Academy – SuperLead leadership and management programme for middle managers, new leaders and successors.	Adopted	Portugal	Ongoing	Strengthening of leadership and management skills.
22	Secil Academy – Cement Technical School: Certification of central control room operators.	Adopted	Portugal and Tunisia	Ongoing	Certification of central control room operators.
23	Grow and Glow Camp: Training programme to leverage learning, collaboration and growth mindset across all functions.	Completed	Tunisia	Short-term	Three programmes were carried out in 2025, involving 97% of employees in Tunisia..
24	Training on the Role of the Leader	Completed	Brazil	Short-term	Training delivered to employees assuming leadership positions and to new leader employees.

The table above presents a set of measures and initiatives adopted with the main objective of generating positive impacts for the own workforce, complementing the actions aimed at preventing or remediating negative impacts. Particular emphasis is placed on initiatives focused on promoting well-being, professional development and employee engagement with the organisation [S1.38c], as well as actions aimed at strengthening equity and diversity.

As **local highlights**, the following stand out:

- **Action 11 – In Portugal**, the implementation of the Employee Assistance Programme (EAP). Employee well-being is also a strategic priority and an essential pillar of Secil’s culture and, in this regard, the EAP reflects this commitment by providing specialised, confidential and fully free support to all employees and their immediate family members. The programme offers psychological, social, legal and financial support 24 hours a day, 7 days a week, ensuring a rapid, human and tailored response to each situation.
- **Action 23 – In Tunisia**, the Grow & Glow Camp involved 97% of employees in the geography, through more than 7 thousand hours of training. The development programme aimed to promote learning, collaboration and a growth mindset for all Secil Tunisia employees, both leadership and operational staff. The programme content included communication skills, self-management, conflict management, feedback, coaching and individual development plans. The expected impact of the programme was to enhance individual capabilities, strengthen the sense of ownership and continuous improvement, and promote a collaborative culture that drives sustainable growth.
- **Action 15 – In Brazil**, the benefits package was reviewed following the global reward management project, which assessed internal equity and external competitiveness of remuneration across the Group. The most impactful improvement was the implementation of a private pension plan, promoting employees’ long-term financial security. Additionally, meal, transport and maternity leave benefits were improved, and new support programmes focused on well-being and development were introduced, such as TotalPass (physical activity), Educa+Supremo (education) and fuel allowance.
- **Action 13 – In Lebanon**, an HR Software system is being implemented that enables employees to access a range of services autonomously, in real time and with greater accuracy.

The focus on creating a culture of equity and inclusion, promoting equal opportunities among employees and within the communities where it operates, motivated the overarching objective of providing equal opportunities and promoting diversity in management decisions across the Secil Group, aligning with international best practices and strengthening corporate reputation [S1.38b].

The representation of women at Secil, identified as a negative impact in terms of diversity, is a topic addressed within the social pillar of the Sustainability Policy (Chap. 3.1.4.1) and is continuously monitored [S1.46 | ERS2.80a].

In terms of pay equity and benefits, Secil aims to reduce gender gaps and ensure equitable conditions for all, preventing inequalities and reinforcing fairness in the workplace [S1.38b]. By investing in employer branding campaigns (Action 19), it aims to increase the inclusion of women in technical sectors, promoting diversity [S1.38b].

The investment made in education and training prepares employees for future challenges, increasing the company's competitiveness. Additionally, the emphasis on innovation and belonging ensures that Secil remains competitive and sustainable [2.68a | 2.68b | 2.68c].

With regard to monitoring and assessing the effectiveness of actions and initiatives aimed at its own workforce, Secil adopts a systematic approach. The Organisational Climate Survey (Action 9), conducted biennially, was also carried out in 2025 and covered the entire Secil workforce. The results from the various thematic working groups across the geographies where Secil operates are consolidated and analysed, with the objective of creating action plans for the identified improvement opportunities, as well as implementing them. In the interim years, when the full survey is not conducted, the Pulse survey was implemented, consisting of shorter questionnaires distributed to 20% of the Secil population to ensure continuity in monitoring key issues.

These forms of monitoring and evaluation of the effectiveness of actions and initiatives are in addition to those already detailed previously in this report, such as Continuous Feedback (Stay Interviews – Action 6); Internal Communication Channels; Performance Indicators; Voluntary/Involuntary Turnover Rate; assessment of fluctuations in retention rates following specific actions (bonuses, recognition of ideas, etc.); Equity Indicators; Satisfaction and Engagement Surveys; Evaluation of the Impact of Partnerships; Audits and Internal Reviews to ensure that implemented actions are aligned with the company's strategic objectives and values; and Recognition and Continuous Adjustments to actions based on collected feedback and acknowledgement of positive results from initiatives [AR38 | AR39 | AR42 | S1.38d].

Following the material opportunities identified, Secil adopted several actions aimed at attracting and retaining talent, strengthening motivation and improving the employee experience [S1.40b].

For the remaining identified impacts, the internal and collaborative methods and practices that enable their identification and prevent them from becoming significant issues have already been mentioned. [S1.39]

A comprehensive approach is adopted to ensure that internal practices neither cause nor contribute to material negative impacts on the Secil Group's own workforce. These cover areas such as public procurement, sales and data use. This commitment is reflected in policies and procedures, particularly the Sustainability Policy, the Supplier Code of Conduct and the Sustainability Commitments 2020–2030, aligned with the guidelines of the Global Cement and Concrete Association (GCCA), reflecting the company's responsibility to mitigate the impacts of its operations on the environment and the communities where it operates.

With regard to the use of data relating to its employees, customers and partners, Secil acts in compliance with the General Data Protection Regulation (GDPR). [S1.41]

The processes for managing material risks related to employees within the own workforce are integrated into Secil's existing risk management processes, namely the Secil risk management process (Chap. 4.4). [AR47]



### Secil Global HR Handbook

The Secil Global Human Resources Handbook, launched in 2025, documents the fundamental principles, policies, processes and tools adopted within Human Resources management across the organisation, ensuring consistent, coherent and globally aligned people management.

This handbook is intended to serve as a reference for Human Resources management, defining the main objectives and concepts of people management policies, as well as the respective processes, standards and tools.

Prepared rigorously, the handbook consolidates Secil's Human Resources principles, policies and processes, providing clear guidance in areas such as talent management, performance assessment, employee engagement, and compensation and benefits policies. It also reflects Secil's shared mission to support the development and well-being of its people, while ensuring consistency in the practices adopted across all geographies where Secil operates.

## METRICS AND TARGETS – Talent Development

### S1-5 – Targets related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities

The targets defined for the own operations of the entire Secil Group involved internal stakeholders and have not been changed since the period in which they were established. In the case of the stakeholder engagement plan, the impact is reflected across the entire value chain. [ESRS2.80c | 2.80g | 2.80h | 2.80i | S1.46]

## Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
[ESRS 2.77c   ESRS 2.80b]	[ESRS 2.80c   ESRS 2.80d]	[ESRS 2.75; ESRS 2.80b]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.80b   ESRS 2.80e   S2.39]
Employee turnover	Baseline value: 12,80% Base year: 2020	Voluntary/ involuntary employee turnover (%)	12.2 %	11.2 %	9.2 %
Employee Satisfaction (eNPS)	Baseline value: 35 Base year: 2021	eNPS	34 <sup>18</sup>	40 <sup>19</sup>	Between 36 and 40
Percentage of Women	Baseline value: 12% Base year: 2020 Baseline value: 12% Ano Base: 2020	% women	13.5 %	13.5 %	14.5 %
Training & Development	Baseline value: 650 Base year: 2020	Training & Development (€/FTE)	498.44€/FTE	502.77€/FTE	700€/FTE

In the case of **employee turnover**, the focus was on reducing voluntary/involuntary employee turnover (%), monitored quarterly. In this way, the aim is to ensure that Secil fosters attractive and stable working environments, promoting well-being and job security, as well as **employee satisfaction**. This value is monitored through eNPS, which also reflects employee engagement. The objective is to achieve a high score, reflecting the promotion of positive and inclusive working environments, as this impacts productivity and Secil's reputation as an employer. It also makes it possible to assess employee satisfaction at various levels. [S1.46 | ESRS2.80f | S1.47]

The **percentage of women**, monitored quarterly, promotes equal opportunities for women and men. Increasing the percentage of women in Secil's workforce contributes to diversity, equity and inclusion, reflecting the commitment to fair and inclusive labour practices.

**Training and development** indicators (€/FTE) enable topics related to this area to be monitored. [S1.46 | ESRS2.80e | 2.80f] The quarterly monitoring of this metric contributes to skills development, the promotion of employability, innovation and Secil's sustainable competitiveness. [S1.46 | ESRS2.80f | S1.47]

<sup>18</sup> The 2024 eNPS was obtained through a Pulse survey, conducted with a sample of the population.

<sup>19</sup> The 2025 eNPS was the result of a Pulse survey, conducted with a sample of the population. In 2025, the Pulse survey recorded a participation rate of 44% of the population.

## S1-6 – Characteristics of the company's employees

The figures presented are determined without the use of estimates, based on payroll processing systems and cross-checked with the values compiled by the Reporting areas. [AR60 | S1.50d | S1.50f]

S1.50a -Total number of employees, by gender

<b>Total number of employees, breakdown by gender</b>		<b>2025</b>	<b>2024</b>
<b>Number of employees</b>			
S1-6-002	Male	2 499	2 226
S1-6-003	Female	391	347
S1-6-001	Total employees*	2 890	<b>2 573</b>

\*Note: This value includes Secil's governing bodies.

<b>Total number of employees, by type of contract, breakdown by gender</b>		<b>2025</b>	<b>2024</b>
<b>Number of employees</b>			
S1-6-003, S1-6-002, S1-6-004, S1-6-005, S1-6-001	Male	2499	2226
	Female	391	347
	<b>Total*</b>	<b>2890</b>	<b>2573</b>
<b>Number of permanent employees</b>			
1-6-014, S1-6-013, S1-6-015, S1-6-016, S1-6-012	Male	2329	1982
	Female	372	316
	<b>Total</b>	<b>2701</b>	<b>2298</b>
<b>Number of temporary employees</b>			
S1-6-021, S1-6-020, S1-6-022, S1-6-023, S1-6-019	Male	142	215
	Female	17	31
	<b>Total</b>	<b>159</b>	<b>246</b>
<b>Number of non-guaranteed hours employees</b>			
S1-6-028, S1-6-027, S1-6-029, S1-6-030, S1-6-026	Male	28	29
	Female	2	0
	<b>Total</b>	<b>30</b>	<b>29</b>
<b>Number of full-time employees</b>			
S1-6-035, S1-6-034, S1-6-036, S1-6-037, S1-6-033	Male	2475	2225
	Female	388	347
	<b>Total</b>	<b>2863</b>	<b>2572</b>
<b>Number of part-time employees</b>			
S1-6-042, S1-6-041, S1-6-043, S1-6-044, S1-6-040	Male	24	1
	Female	3	0
	<b>Total</b>	<b>27</b>	<b>1</b>

This information is included in the financial statements, in the Personnel Expenses section.

S1-6-001 - S1-6-009 | Total number of employees, by gender and country.

<b>Total number of employees, breakdown by country/ region</b>		<b>2025</b>	<b>2024</b>
<b>Number of employees</b>			
S1-6-006	Angola	81	88
	Brazil	568	566
	Cape Verde	29	29
	Lebanon	426	435
	Netherlands	3	3
S1-6-007	Portugal	1 225	1 166
S1-6-008	Spain	19	17
S1-6-009	Tunisia	539	269
S1-6-001	<b>Total*</b>	<b>2 890</b>	<b>2 573</b>

\*Note: This value includes Secil's governing bodies.

<b>Total number of employees, by type of contract, breakdown by region</b>		<b>2025</b>	<b>2024</b>
<b>Number of permanent employees</b>			
S1-6-017, S1-6-018, S1-6-012	Angola	81	77
	Brazil	568	566
	Cabo Verde	26	29
	Lebanon	401	390
	Netherlands	3	3
	Portugal	1066	959
	Spain	19	17
	Tunisia	537	257
	<b>Total*</b>	<b>2701</b>	<b>2298</b>
<b>Number of temporary employees</b>			
S1-6-024, S1-6-025, S1-6-019	Angola	0	10
	Brazil	0	0
	Cabo Verde	3	0
	Lebanon	0	23
	Netherlands	0	0
	Portugal	154	201
	Spain	0	0
	Tunisia	2	12
	<b>Total*</b>	<b>159</b>	<b>246</b>

<b>Total number of employees, by type of contract, breakdown by region</b>		<b>2025</b>	<b>2024</b>
S1-6-031, S1-6-032, S1-6-026	<b>Number of non-guaranteed hours employees</b>		
	Angola	0	1
	Brazil	0	0
	Cabo Verde	0	0
	Lebanon	25	22
	Netherlands	0	0
	Portugal	5	6
	Spain	0	0
	Tunisia	0	0
	<b>Total*</b>	<b>30</b>	<b>29</b>
S1-6-038, S1-6-039, S1-6-033	<b>Number of full-time employees</b>		
	Angola	81	88
	Brazil	568	566
	Cabo Verde	29	29
	Lebanon	401	435
	Netherlands	3	3
	Portugal	1225	1165
	Spain	19	17
	Tunisia	537	269
	<b>Total*</b>	<b>2863</b>	<b>2572</b>
S1-6-045, S1-6-046, S1-6-040	<b>Number of part-time employees</b>		
	Angola	0	0
	Brazil	0	0
	Cabo Verde	0	0
	Lebanon	25	0
	Netherlands	0	0
	Portugal	0	1
	Spain	0	0
	Tunisia	2	0
	<b>Total*</b>	<b>27</b>	<b>1</b>

\*Note: This value includes Secil's governing bodies.

The figures presented in the tables, as reported by each country in which Secil operates, are derived from payroll processing systems and cross-checked against the data compiled by the Reporting teams. [S1.50d]

**[S1.50c]**

<b>Employee turnover rate</b>		<b>2025</b>	<b>2024</b>
S1-6-047	Number of employees who left the company	325	314
	Number of employees at the end of the reporting period	2 890	2 573
S1-6-048	Employee turnover (%)	11.2 %	12.2 %

Note: This value includes Secil's governing bodies.

The denominator for turnover was based on the total number of employees. New hires are not considered in this denominator, as the description above refers only to turnover related to departures. [AR59]

## S1-7 – Characteristics of the company’s non-employees

[S1.55a]

<b>Number of non-employees</b>		<b>2025</b>	<b>2024</b>
<b>Non-employees</b>			
S1-7-001	Angola	44	42
S1-7-002	Brazil	185	181
S1-7-003	Cape Verde	15	12
S1-7-004	Lebanon	48	68
S1-7-005	Netherlands	3	2
S1-7-006	Portugal	1 242	1 085
S1-7-007	Spain	9	45
S1-7-008	Tunisia	60	442
	<b>Total</b>	<b>1 606</b>	<b>1 877</b>

Note: Interns and non-employee workers are being considered.

The number of non-employees is reported in headcount and refers to the end of the reporting period. No values were estimated. [S1.55b-1 | S1.55b-2 | S1.57]

## S1-8 – Collective bargaining coverage and social dialogue

<b>Collective bargaining agreements</b>		<b>2025</b>	<b>2024</b>
<b>Coverage of Collective bargaining agreements (%)</b>			
S1-8-002	In the EEA	83.4 %	82.6 %
S1-8-003	Portugal	83.2 %	82.4 %
S1-8-007	Outside the EEA	92.9 %	91.6 %
S1-8-008			
	Tunisia	99.8 %	99.6 %
	Angola	98.8 %	98.9 %
	Cape Verde	– %	– %
	Brazil	99.1 %	99.3 %
	Lebanon	81.0 %	81.4 %
S1-8-001	<b>Total</b>	<b>88.8 %</b>	<b>87.5 %</b>

Only countries with a significant number of employees were considered, defined as a minimum of 50 employees representing at least 10% of the total number of employees. Employees in the Netherlands and Spain are excluded.

<b>Social Dialogue</b>		<b>2025</b>	<b>2024</b>
S1-8-002	In the EEA	84.3 %	83.6 %
S1-8-003	Portugal	84.1%	83.4 %

The scope of this datapoint only includes countries within the European Economic Area (EEA) where there is significant employment (i.e., at least 50 employees representing at least 10% of its total workforce).

Although all employees are covered by collective bargaining agreements, there are more structural working conditions (e.g. general salary increases) that are determined by a broader collective agreement (and more favourable to employees). Non-employees are generally hired through service providers and are therefore not covered by these collective bargaining agreements. [S1.61 | S1.62 | S1.63b]

**[AR70] Reporting template for collective bargaining coverage and social dialogue**

Coverage rate (%)	Collective bargaining coverage		Social dialogue
	Employees – EEA (for countries with > 50 employees representing > 10% of total employees)	Employees – Outside the EEA (estimate for regions with > 50 employees representing > 10% of total employees)	Representation at workplace level (EEA only) (for countries with > 50 employees representing > 10% of total employees)
0 – 19%	n/a	n/a	n/a
20 – 39%	n/a	n/a	n/a
40 – 59%	n/a	n/a	n/a
60 – 79%	n/a	n/a	n/a
80 – 100%	Portugal	Brazil, Tunisia, Lebanon	Portugal

Secil has not entered into any agreement with the company's employees for representation through a European Works Council, a Societas Europaea Works Council or a Societas Cooperativa Europaea (SCE) Works Council. [S1.63b]

**S1-9 – Diversity metrics**

[AR71]

[S1.66a]

Gender distribution at top management level (number)		2025	2024
Employees at top management level (number)			
S1-9-002	Male	82	121
S1-9-003	Female	19	26
S1-9-001	<b>Total</b>	<b>101</b>	<b>147</b>

[S1.66a]

Gender distribution at top management level (%)		2025	2024
Employees at top management level (%)			
S1-9-006	Male	81.2 %	82.3 %
S1-9-007	Female	18.8 %	17.7 %

In the data presented, employees classified as Senior Management and those classified as Managers were considered as senior managers. [AR71]

**[S1.66b]**

<b>Distribution of employees by age group</b>		<b>2025</b>	<b>2024</b>
Number of employees			
S1-9-010	< 30 years old	330	294
S1-9-011	30-50 years old	1 692	1 446
S1-9-012	> 50 years old	868	833
S1-9-012	Number of total employees	<b>2 890</b>	<b>2 573</b>

### S1-10 – Adequate wages

At Secil, all employees earn above the national minimum wage in each geography. [S1.69] This information does not consider non-employees, as Secil has no control over their wages. However, Secil is confident that its service providers ensure legal compliance, namely with regard to respecting the national minimum wage.

### S1-15 – Work-life balance metrics

<b>Percentage of employees entitled to take family-related leave (%)</b>		<b>2025</b>	<b>2024</b>
S1-15-001	<b>Total</b>	<b>81 %</b>	<b>84 %</b>

<b>Percentage of employees who are entitled to and make use of family-related leave (%)</b>		<b>2025</b>	<b>2024</b>
S1-15-003	Male	2.9 %	2.7 %
S1-15-004	Female	2.4 %	4.9 %
S1-15-002	<b>Total</b>	<b>2.9 %</b>	<b>3.0 %</b>

The information presented relates to Secil employees across all geographies. Family care leave commencing in 2025 was considered for the calculation.

## S1-16 – Compensation metrics (pay gap and total compensation)

Pay gap between men and women (%)		2025	2024
S1-16-001	Angola	43.4 %	42.2 %
S1-16-001	Brazil	(6.6)%	55 %
S1-16-001	Lebanon	(68.7)%	25.3 %
S1-16-001	Portugal	(29.2)%	29.6 %
S1-16-001	Tunisia	(57.4)%	35.5 %
S1-16-001	<b>Total</b>	<b>(56.9)%</b>	<b>39.1 %</b>

Note 1: Employees from the Netherlands, Spain and Cape Verde were considered in the calculation of the total of this indicator, however, in 2024, they were not.

Note 2: The regular fixed remuneration was considered in 2025.

Note 3: The methodology used to calculate this indicator in 2025 differed from that used in 2024.

Note 4: To address the gender pay gap topic, Secil does not limit itself to monitoring this KPI. The Company adopts a broader approach aimed at ensuring internal equity and external competitiveness of remuneration practices across the Group. For further details, please refer to the actions under the Promotion of Equity, presented in the actions table, in the section “Actions and Resources – Talent Development”, of the chapter “ESRS S1 – Own Workforce”.

## S1-17 – Incidents, complaints and severe human rights impacts and incidents

During the reporting period, 18 complaints submitted by employees through the Integrity Channel were received, handled and closed. Of these, 4 related to work-related discrimination and/or harassment incidents, for which monitoring and improvement measures were implemented, including active listening sessions with teams, reinforcement of the Code of Conduct, structured feedback to leadership, awareness-raising actions and training in communication and leadership, with the situations remaining under monitoring.

Through the Integrity Channel, available to all Group employees, the following may be reported: violations of the Code of Conduct (e.g. harassment, discrimination, conflicts of interest, among others); fraud, corruption and bribery; human rights violations; non-compliance with legal and/or regulatory standards; non-compliance with health and safety rules; disclosure of confidential information; among others. These reports are analysed and such analysis may or may not result in the opening of an investigation and the subsequent implementation of corrective measures, where necessary and/or appropriate. [S1-17-001 | S1.103a | S1.103d]

There were no recorded complaints regarding severe human rights incidents related to the workforce and there were no monetary compensations due to damages, nor severe human rights incidents related to the company’s workforce. [S1-17-002 | S1-17-003]

### 3.1.3.2. ESRS S2 – Workers in the value chain

#### STRATEGY

#### **SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with the strategy and business model**

Description	Impact, Risk or Opportunity	Time horizon	Location in the value chain	Related sub-topic or sub-sub-topic
<b>[ESRS2.48a]</b> Failure to comply with occupational health and safety rules and procedures may negatively impact workers' health and safety.	<b>[ESRS2.48a]</b> Negative impact	<b>[ESRS2.48ciii]</b> -	<b>[ESRS2.48a]</b> Own operations, upstream	Health and safety

Note: The material impacts identified are actual impacts and therefore do not have an associated time horizon.

The actual impacts identified in the table above [S2.11d | S2.13], affecting workers in the value chain with regard to safety, are directly linked to the organisation's strategy and business model. The mandatory participation of contracted workers in the safety strategy, as well as the implementation of a monitoring system, the provision of Personal Protective Equipment (PPE), the holding and obtaining of certifications and the delivery of safety training, reflect Secil's strategic commitment to identifying, managing and mitigating risks and protecting its workforce. This commitment covers both direct and indirect workers, ensuring their safety and well-being (Chap. 3.1.3.1). [S2.10a-1 | S2.10a-2 | S2.10b]

Workers in the value chain operating at Secil facilities follow the same health and safety standards as direct workers, without any type of exclusion. [S2.11] It should be noted that, according to the materiality assessment, no material risks or opportunities arising from Secil's operations, strategy and business model were identified with regard to workers in the value chain. [S2.10b]

Secil identifies and defines several types of workers in its value chain that are subject to its material impacts, whether due to its own operations or those of the remaining value chain, namely: [S2.11a]

#### **Workers performing activities at the organisation's facilities but who are not part of the workforce**

These workers, such as contractors, subcontractors or temporary workers, may be impacted if safety rules and procedures are not rigorously applied or if training is insufficient. This may result in accidents, namely involving equipment, chemicals or activities related to Secil's production and maintenance operations.

#### **Workers operating in entities within the organisation's upstream value chain (ii):**

These workers are employed by suppliers or service providers that supply raw materials, equipment or services. Where these upstream workers are involved in the production of materials used by the organisation, they may be affected by working conditions at supplier facilities, including, for example, exposure to hazardous substances or violations of labour rights.

**Workers operating in entities within the organisation's downstream value chain (iii):**

These workers are involved in the distribution, sale or end use of the organisation's products. If the products or operations impact downstream workers, especially logistics workers or construction-related workers, safety risks may arise related to the transportation of goods or the use and handling of the finished product.

Among the different value chain workers identified, no significant risks of child labour or forced/ compulsory labour were identified, either in relation to the products developed or in the geographies where Secil operates. With regard to health and safety, Secil requires all contractors to provide the necessary documentation relating to their workers and applies a strict policy prohibiting the presence of minors under the age of 18 at its facilities. This approach reinforces the commitment to legal compliance and the protection of labour rights. [S2.11b]

Within the scope of health and safety, the identified material negative impacts are of a widespread or systemic nature. Risks such as workplace accidents, exposure to hazardous materials or machinery-related injuries are common in this sector and may occur across different geographies or business contexts. However, by implementing stringent safety measures — such as requiring contractors to provide the necessary health and safety documentation, delivering training and providing personal protective equipment — the company seeks to prevent these risks from becoming widespread or systemic. Although these measures minimise risk, individual incidents may still occur, especially if safety procedures are not properly followed or if there are failures in the operational safety culture. [S2.11c]

Although the Health and Safety Policy is rigorous, Secil recognises that there are workers with specific characteristics, operating in contexts or activities along the value chain, who may be more negatively impacted, namely: [S2.12]

**Workers under the age of 18:**

These workers may be more vulnerable to accidents or injuries due to inexperience or lack of physical strength to handle heavy machinery or hazardous materials. The organisation's policy of not allowing workers under the age of 18 at its facilities helps minimise this impact.

**Contracted and temporary workers:**

These workers may be more exposed to risks of harm due to inconsistent safety training, lack of familiarity with the company's specific procedures or reduced access to personal protective equipment. The organisation's policy requiring contractors to provide safety documentation and ensure compliance helps mitigate this risk.

**Workers in sectors such as Secil's, where machinery, hazardous materials and heavy physical work are common:**

These workers face significant safety risks. Ensuring adequate PPE, training, review and adaptation of tasks, as well as regular safety checks on equipment, helps protect them against injuries and accidents.

**Workers operating complex machinery or heavy equipment:**

These workers face a higher risk of serious injuries or accidents due to the nature of the work. Comprehensive training, regular machine maintenance and clear safety procedures are essential to protect them

**Workers exposed to chemicals, dust or other hazardous materials:**

These workers face increased risks of long-term health problems, such as respiratory conditions or chemical burns. Providing adequate PPE, ventilation and safety training can help reduce these health risks.

**Workers in remote locations, particularly those involved in fieldwork or construction:**

These workers may be at risk due to emergency response times in the event of accidents. Ensuring adequate communication equipment, emergency procedures and first aid training can help mitigate these risks.

**Migrant workers, often in temporary or contracted positions:**

These workers may be more susceptible to safety risks if they are unfamiliar with local standards, if language barriers limit the understanding of safety instructions or if they face discrimination. Clear safety induction programmes and translation services can help mitigate these challenges.

**MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES**

**S2-1 – Policies related to workers in the value chain**

The Group has several Policies, among which the **Supplier Code of Conduct** stands out, addressing topics such as worker safety, precarious work, human trafficking, forced labour and child labour. [S2.16 | 2.65 | ESRS 2.65a | S2.19]

The **Health and Safety Policy** adopted by Secil was developed to ensure the well-being and protection of all those involved. This policy includes comprehensive safety procedures, clear guidelines for the use of PPE, regular safety training and strict adherence to regulatory requirements.

The company ensures that this policy is accessible and understood by all stakeholders through various communication channels. Its communication includes face-to-face interactions and is supported by workers’ representatives, who facilitate the dissemination of information. It is also prominently displayed in several locations throughout the facilities to ensure easy access for all workers. Additionally, in order to ensure there are no comprehension barriers, the policy is translated into the relevant languages, enabling workers of different nationalities to effectively understand its implications. [AR16]

In 2025, no cases of non-compliance were reported within the value chain based on the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises. [S2.19]

**Policies**

<b>Document</b>	<b>Supplier Code of Conduct</b>
<b>Key contents and objectives</b> [ESRS 2.65a]	Respect local and national laws and regulations relating to occupational health and safety, environment and human rights.
<b>Scope</b> [ESRS 2.65b]	Covers own operations, upstream and downstream value chain activities, and applies to suppliers and the Procurement area. Covers the entire Secil Group.
<b>Stakeholders</b> [ESRS 2.65e]	Suppliers, Procurement area, legal department, health and safety department.
<b>Most senior level responsible for implementation</b> [ESRS 2.65c]	CPO and COO of the Secil Group.
<b>Availability</b> [MDR-P_06; §65 f]	<ul style="list-style-type: none"> <li>● Secil internal SharePoint;</li> <li>● Email whenever each purchase order is sent;</li> <li>● Secil corporate website.</li> </ul>



The **Supplier Code of Conduct**, which covers supplier workers [S2.16 | ESRS 2.65], clearly establishes provisions aligned with various international principles addressing worker health and safety, precarious work, human trafficking, forced and/or child labour, freedom of association and non-retaliation, non-discrimination, environmental impact management, compliance with environmental regulations, and transparency and integrity. [S2.17 | S2.19] Although not explicitly stated, the code is considered to be aligned with the ILO Declaration on Fundamental Principles and Rights at Work. [S2.19]

This document establishes that suppliers must ensure safe and healthy working conditions and workplaces for their employees and contractors, fully complying with local and national occupational health and safety laws and regulations. They must also hold all authorisations, licences and permits required by the competent authorities and ensure the implementation of appropriate safety measures to protect workers operating at their facilities.

The code further reinforces the importance of ensuring fair and decent working conditions: workers must receive, at a minimum, the minimum wage established by national legislation and have access to social security schemes in compliance with applicable legal standards. In countries where there is no statutory minimum wage, suppliers are encouraged to remunerate workers taking into account general wage levels, cost of living, social security benefits and relative living standards. [S2.17 | S2.19 | AR15]

Additionally, it expressly prohibits any form of forced or involuntary labour under threat of sanctions, including imposed overtime, human trafficking, debt bondage, forced prison labour, slavery or servitude. Furthermore, suppliers may not retain the identification documents of migrant workers, and the employment of children of compulsory school age is prohibited, with individuals under the age of 18 or below the legal minimum age not being employed. [S2.17 | S2.19]

Finally, the Supplier Code of Conduct is sent to all suppliers together with purchase orders and, since 2024, acceptance of the Code of Conduct has been required from all critical suppliers within the Procurement scope. [S2.17]

The following information is incorporated by reference to other sections of the non-financial statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Human Rights Policy – Chap. 3.1.4.1, G1
- Health and Safety Policy – Chap. 3.1.3.1, S1

### **S2-3 – Processes to remediate negative impacts and channels for workers in the value chain to raise concerns**

Secil's approach to health and safety in cases of material negative impacts, such as an accident involving a contracted worker, follows a structured process that covers both the treatment of the harm and the implementation of preventive measures. For each situation, different strategies are applied – ranging from incident reporting, investigations, emergency response protocols, work permits, grievance mechanisms, safety audits and continuous training – ensuring rapid corrective actions, continuous improvement and the reduction of incidents, with faster emergency response times and greater worker engagement in safety. By monitoring and improving these processes, the company reinforces a strong safety culture and ensures the well-being of both internal and external workers. [S2.27a | S2.33c]

The processes for providing or contributing to the remediation of a material negative impact caused by the company vary, adopting different approaches depending on the situations that occur, such as: [S2.27a | S2.33c]

- **First aid and immediate medical attention** | In the event of an accident, first aid and immediate medical attention are provided to the affected contracted worker. Secil has established protocols to ensure that emergency services are activated whenever necessary, ensuring that workers receive appropriate care to minimise the impact of the injury.
- **Investigation and root cause analysis of the accident** | A detailed investigation is conducted to determine the cause of the accident. This process involves analysing safety procedures, equipment, training received and the actions that led to the incident. If the accident is attributed to failures in the company's health and safety practices or systems, corrective actions are implemented.
- **Remediation and compensation** | Depending on the severity of the incident, appropriate compensation or benefits are provided to the affected contracted worker, such as workers' compensation or medical support, ensuring that they receive the necessary support for their recovery and for any work-related loss of income.
- **Implementation of corrective measures** | To prevent future incidents, corrective measures are implemented, such as updating safety protocols, improving training or maintaining equipment. Contracted workers and other workers are retrained where necessary, and additional safety measures are introduced.
- **Communication with the affected worker** | Continuous communication is maintained with the affected contracted worker to ensure that their needs are addressed and that they receive the necessary support throughout the recovery process. If they are unable to return to work immediately, alternatives such as reassignment of duties or remote work may be considered.
- **Integrity Channel** | Managed by an external and independent entity, it allows the reporting of irregularities, such as the communication of non-compliance with safety procedures (Chap. 3.1.2.1). Following the receipt of a report through the Integrity Channel, it is analysed confidentially and anonymously, initiating a process that may result in an investigation and the implementation of corrective measures. The whistleblower is notified of the receipt and, within a reasonable timeframe, informed about the developments. If the report involves members of the integrity committees, it is forwarded to the competent committee.

The effectiveness of Secil's Health and Safety approach is assessed based on the overall strategy and the processes adopted, and is monitored through the following actions: [S2.27a]

- **Monitoring of recovery and reintegration** | Secil monitors the recovery progress and reintegration of the affected contracted worker, ensuring that they are physically and mentally fit to resume their duties and that their well-being is continuously monitored throughout this process.
- **Review of the implementation of corrective actions** | Following the implementation of corrective actions, Secil assesses the effectiveness of these measures in reducing the risk of similar incidents in the future. This process is carried out through regular safety audits, worker feedback and the monitoring of safety metrics.
- **Feedback mechanisms** | Contracted workers are encouraged to provide feedback on the effectiveness of corrective actions and any other safety-related concerns. This ensures that remediation is not only reactive but also proactive, helping to prevent recurrence.

## ACTIONS AND RESOURCES

### S2-4 – Taking action on material impacts on workers in the value chain and approaches to managing material risks and pursuing material opportunities related to workers in the value chain, and the effectiveness of those actions

Regarding value chain workers, in 2025 the company implemented three key actions in the area of safety (Actions 1, 2 and 3), and four actions (Actions 4, 5, 6 and 7) in the area of Sustainable Procurement, through its Procurement department, as well as approaches to manage material risks, identify material opportunities related to these workers and assess the effectiveness of those actions. [S2.27a | AR43 | S2.35]

Further details on the main actions taken regarding the health and safety of contracted workforce workers (external workers at our facilities) are described in the table below: [ESRS 2.68d]

#### Actions

	Key actions	Status	Scope of action	Time horizon	Expected results/ Effects
	[ESRS 2.68a]	[ESRS 2.68 e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
1	<b>Induction</b> All contractors and visitors entering Secil's facilities are required to undergo a safety induction.	Adopted	All geographies	Ongoing	Safety inductions in place covering employees, contractors and visitors.
2	<b>DDS</b> Safety dialogues are conducted daily and/or weekly for all internal and external workers, addressing workplace risks and hazards.	Adopted	All geographies	Ongoing	Daily/weekly safety dialogues in place. Impacts employees and contractors.
3	<b>WP (Work Permit)</b> An established procedure requires obtaining a work permit before starting specific tasks, regardless of whether the workers involved are internal or external.	Adopted	All geographies	Ongoing	Procedural workflow implemented, impacting employees and contractors.

- **Action 1 – Mandatory safety induction for contractors and visitors** – By requiring all external contractors and visitors to undergo a safety induction, Secil ensures that all individuals entering its facilities are duly informed about safety risks and procedures. This proactive approach minimises the risk of accidents, reducing the likelihood of harm. In the event of an incident, the induction serves as an essential basis for establishing awareness and compliance, supporting corrective actions and promoting improvements in safety behaviour.
- **Action 2 – Daily safety dialogues** – Conducting regular safety dialogues for internal and external workers strengthens awareness of hazards and risk mitigation strategies. These discussions provide workers with an opportunity to raise safety concerns, report near misses and suggest improvements. This mechanism promotes transparency and enables the identification of systemic issues, leading to the adoption of corrective actions that address actual material impacts on workers' health and safety. [ESRS 2.68d | S2.32a | S2.27a]
- **Action 3 – Mandatory work permits for non-routine tasks** – The implementation of a work permit system for certain tasks ensures that potential risks are assessed before the activity begins. This process includes hazard identification, the definition of control measures and authorisation stages, thereby reducing the likelihood of incidents. If harm occurs, the authorisation process provides documentation that facilitates investigations and ensures that appropriate corrective measures – such as procedural changes, retraining or safety improvements – are adopted to prevent recurrence.

The main actions taken within the scope of Sustainable Procurement are described in the table below: [ESRS 2.68d]

## Actions

Key actions	Status	Scope of action	Time horizon	Expected results/effects
[ESRS 2.68a]	[ESRS 2.68e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
<b>4 Supplier Code of Conduct</b> Request for acceptance of the Code of Conduct sent to critical suppliers.	Adopted	All geographicals	Ongoing	Increase in the % of ESG Critical Suppliers associated with Secil through the Procurement Policy and Supplier Code of Conduct (relative*).  *Corresponding to the unit of Target 3. See the metrics and targets table.
<b>5 Supplier Code of Conduct</b> Request for acceptance of the Code of Conduct sent to suppliers involved in quotation processes conducted through the sourcing platform.	Adopted	Portugal e Brazil	Ongoing	Increase in the % of suppliers associated with Secil through the Procurement Policy and Supplier Code of Conduct in ESG terms (relative*). Impacts suppliers and the Procurement area.
<b>6 Supplier Code of Conduct – Acceptance</b> The Code of Conduct is sent together with all purchase orders.	Adopted	All geographicals	Ongoing	Increase in the % of ESG Critical Suppliers associated with Secil through the Procurement Policy and Supplier Code of Conduct (relative*). Impacts own operations and the upstream value chain, affecting suppliers.  *Corresponding to the unit of Target 3. See the metrics and targets table.
<b>7 ESG Questionnaire</b> The company sends ESG questionnaires to critical suppliers, including questions regarding current regulations and policies adopted across the three pillars: environmental, social and governance.	In progress	Portugal	Medium term	Improved assessment of supplier conduct. Covers own operations and the upstream value chain, impacting suppliers within the Procurement area.

Note: The objectives of Actions 4 and 5 were achieved before the deadline initially set for 2025.



**Actions 4, 5 and 6 – Supplier Code of Conduct** – The implementation of a Supplier Code of Conduct reinforces Secil’s commitment to social, environmental, health and safety standards throughout its entire value chain. It promotes responsible and sustainable relationships aligned with the company’s values. Secil therefore expects its suppliers to follow the same standards and comply with applicable legislation. This approach generates mutual value and stronger partnerships.

**Action 7 – ESG Questionnaire** - The implementation of an ESG questionnaire for suppliers enables the assessment of Secil’s suppliers regarding their environmental, social and governance performance, promoting greater transparency and accountability. It facilitates the identification of risks, alignment with the company’s values and the development of more sustainable and responsible.

Various human and financial resources were allocated to these actions. The Group’s Health and Safety Manager (with each geography also having its own manager and team) and, within the Procurement area, the Strategy and Transformation department and the Procurement Cost Management area are partially allocated to the management of these material impacts. [S2.38]

Regarding financial resources, for the implementation of these actions, the budget and investment plan are the internal management tools used to finance these initiatives, outlining the actions to be executed. [ESRS 2.69a] On the other hand, based on safety-related KPIs, general sustainable financing lines were contracted, supported by sustainability KPIs, one of which is the LTIR (Lost Time Injury Frequency Rate). For further information, please refer to the “Sustainability Linked-Financing” document available on the website. [ESRS 2.69a]

The actions adopted and planned for the Secil Group involved financial resources related to personnel expenses and suppliers, justified within operating activities and the respective payments. In the case of Actions 1, 2 and 3, the resources were allocated to payments to personnel, while for Actions 4, 5, 6 and 7, they were allocated to external supplies and services, also within the scope of operating activities and payments to suppliers. [ESRS 2.69b]

The implementation of these strategic actions related to suppliers and their Code of Conduct directly contributes to achieving the objectives and targets of the policy, promoting a culture of transparency between Secil and its suppliers. [ESRS 2.68a] Furthermore, by sending the Code of Conduct together with purchase orders and requesting suppliers to actively accept our Code of Conduct, we ensure that we work with suppliers that comply with best practices in safety and social responsibility. [S2.32a]

From a safety perspective, the main actions implemented at Secil are aligned with the principles of remedy provision, ensuring that harm is prevented and mitigated, while also promoting accountability and the adoption of corrective measures whenever incidents occur. These actions contribute to remediation in several ways (Chap. 3.1.3.1). [ESRS 2.68d | S2.32a | S2.27a]

Some of the actions described have demonstrated positive results. Mandatory safety induction for contractors and visitors has become more structured, incorporating additional visual resources, which has resulted in a reduction in infringements and, consequently, greater compliance with and understanding of site safety rules by external personnel, although no quantitative measurement has yet been implemented. Daily and weekly safety dialogues have also shown improvement, both in frequency and effectiveness, with greater worker participation and the inclusion of discussions on real incidents, reinforcing practical learning. The mandatory work permit procedure for specific tasks is currently being implemented. [ESRS 2.68e]

The implementation of these strategic safety actions directly contributes to achieving the objectives and targets of the policy, promoting a structured, responsible and proactive safety culture. The establishment of KPIs for essential proficiency in the key components of the safety framework (Chap. 3.1.3.1) ensures measurable progress towards critical safety standards. Visible safety leadership training equips leaders with the necessary skills to model and reinforce safe behaviours, while technical training for the safety team enhances their ability to effectively address operational risks. In 2025, an external consultant was also engaged in order to provide an impartial perspective and specialised guidance to integrate best safety practices into the organisational culture. Finally, the development, regular updating and monitoring of the strategic safety plan ensure continuous alignment with safety objectives, promoting sustained improvement and compliance with safety requirements. [ESRS 2.68a]

All the actions mentioned above, together with other initiatives, are strategically implemented to reduce accidents with lost workdays at our facilities. These efforts aim to proactively address safety risks, improve the safety culture and enhance both technical and behavioural practices at all levels. By establishing clear safety procedures, carrying out regular assessments, providing continuous training and promoting collaboration through meetings and visits, we ensure continuous progress in minimising incidents. Furthermore, ongoing updates to procedures, risk assessments and consultations with specialists contribute to creating a safer working environment and driving the reduction of accidents with lost workdays. [S2.32b]

The identification of necessary and appropriate actions in response to actual or potential negative impacts on value chain workers is carried out through a systematic analysis of accidents with and without lost time, near misses, safety observations, non-conformities and serious incidents. [S2.33a]

The actions referred to exemplify Secil's commitment to ensuring the safety of all external individuals entering its facilities. These initiatives are designed to minimise the risk of accidents for both internal and external workers, promoting a safer working environment. As such, we are at the initial stage of implementing a supplier assessment process based on ESG parameters, with the aim of developing mitigation actions for critical suppliers in the future (future Action 6). [S2.33a]

In 2025, no severe human rights issues or incidents related to the upstream and downstream value chain were reported. [S2.36]

## **METRICS AND TARGETS**

### **S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

Secil has established a set of metrics and targets to be achieved by 2025 regarding health and safety, covering both own workers and contracted workers operating at its facilities, as well as targets related to the Procurement area that affect the material impacts associated with the topic S2 – Workers in the value chain.

The table below presents the target and metric defined by Secil for health and safety, covering both contracted workforce workers and own workforce workers.

## Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
[ESRS 2.77c   ESRS 2.80b]	[ESRS 2.80c   ESRS 2.80d]	[ESRS 2.75; ESRS 2.80b]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.80b   ESRS 2.80e   S2.39]
1 Reduce the accident frequency rate (FR)	Baseline value: 7,5 Base year: 2020	Accident frequency rate	6.8	6.3	3.8

The main targets defined for Sustainable Procurement are described in the table below:

## Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
[ESRS 2.77c   ESRS 2.80b]	[ESRS 2.80d]	[ESRS 2.77c]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.80b   ESRS 2.80e   S2.39]
2 Increase in the % of Critical Suppliers assessed in ESG terms (relative)	Baseline value: 0 Base year: 2022	Percentage of critical suppliers, according to the Secil methodology, that were assessed in terms of ESG Score (actual or predictive).	% of critical suppliers assessed in ESG terms = 66%	% of critical suppliers assessed in ESG terms = 76.2%	100%
3 Increase in the % of ESG Critical Suppliers associated with Secil through the Procurement Policy and Supplier Code of Conduct (relative)	Baseline value: 0 Base year: 2022	Percentage of critical suppliers, according to the Secil methodology, that passively or actively accepted the Code of Conduct.	% of ESG Critical Suppliers associated with Secil through the Procurement Policy and Supplier Code of Conduct = 50%	% of ESG Critical Suppliers associated with Secil through the Procurement Policy and Supplier Code of Conduct = 76.4%	100%
4 Increase in the % of Group Companies that developed a process to identify ESG Critical Suppliers (relative)	Baseline value: 0 Base year: 2022	Percentage of Group companies that developed a methodology to identify critical suppliers.	100%	100%	100%

None of the defined targets underwent changes compared to the previous reporting year. [ESRS 2.80i]

**Target 1** corresponds to the accident frequency rate. This target applies to own operations, involving various stakeholders in the definition of the objectives and covering all Secil geographies, including both own workers and contracted workers operating at the facilities. [ESRS 2.80c | ESRS 2.80g | ESRS 2.80h] In addition, this target is aligned with the Health and Safety Policy, aiming to achieve zero harm for the workforce, contractors and communities. [ESRS 2.80a]

In this way, the aim is to reduce the frequency rate, contributing to sustainable development by prioritising safer workplaces, minimising disruptions resulting from accidents and aligning with the local context of promoting well-being and economic stability in the communities impacted by the company. [ESRS 2.80f]

Stakeholders are involved in the target-setting process for all targets. [ESRS 2.80h] For Target 1, the safety team of each geography collaborates with the respective operational teams in preparing proposals, which are subsequently reviewed and approved by top management. Each geography then presents and supports its proposal to Group management for final approval. [ESRS 2.80h]

Alongside this target, three additional targets were established – **Target 2, Target 3 and Target 4** – related to Procurement, whose definition process was conducted by Secil's Procurement area in collaboration with the Finance Department. [ESRS 2.80h] Target 2 relates to the % of critical suppliers assessed in ESG terms; Target 3 relates to the % of critical suppliers covered by the Procurement Policy and Supplier Code of Conduct; and Target 4 relates to the % of Group companies that implemented a process to identify these ESG critical suppliers. The three targets apply to suppliers contracted within the scope of the Procurement area – both upstream and downstream in the value chain – as well as to own operations, covering all Secil geographies. These targets are expressed on a relative basis, reflecting progress in percentage points, [ESRS 2.80c | ESRS 2.80g | ESRS 2.80h] and are not linked to any policy, except for Target 3, which is associated with the Supplier Code of Conduct. [ESRS 2.80a]

These three targets contribute to sustainable development. By assessing suppliers (Target 2) across the three dimensions – environmental, social and governance – Secil obtains a comprehensive view of how suppliers manage and value their workers. This analysis makes it possible to assess, both directly, social aspects such as human rights and workers' health and safety, and indirectly, the existence of control and monitoring mechanisms to ensure compliance with these rights. Based on this assessment and taking into account the relationship established with each supplier, it will be possible in the future to assign specific improvement actions, directly impacting workers' conditions throughout the value chain. [ESRS 2.80f]

**Target 3**, relating to the Supplier Code of Conduct, contributes to sustainable development by establishing essential requirements to ensure safe and fair working conditions. For further details on this code, see the related policies section. [ESRS 2.80f]

In the case of **Target 4**, the methodology created to identify and prioritise the assessment of suppliers critical to Secil is based on impact classification – high or low, in accordance with GCCA guidelines – taking into account the supply category and the expenditure associated with each supplier. This approach aims, in the future, to implement mitigation actions where necessary, thereby contributing to sustainable development. [ESRS 2.80f]

The metrics associated with the targets resulted from different methodologies, each with its own limitations. [ESRS 2.77a] Of the four metrics, it should be noted that Metric 1 was externally audited by the GCCA. [ESRS 2.77b]

Metrics 1 and 3 were calculated based on precise formulas, without assumptions. Metric 2 considered the supplier's sector of activity, the country in which it is based and its turnover. Lastly, Metric 4 followed the guidelines of the Global Cement and Concrete Association (GCCA), taking into account expenditure per supplier, without considering the actions that the supplier may implement. [ESRS 2.77a]

Regarding **metric 1, the Frequency Rate (FR)**, this metric makes it possible to assess an organisation's safety performance and monitor trends over time. However, the FR has certain limitations, as it does not take into account the severity of incidents nor capture "near misses", which may also provide valuable safety insights. Furthermore, variations in reporting practices, underreporting of incidents and the inability to provide adequate context or reflect the risks faced by all workers may compromise the accuracy of the metric, making comparability between different organisations more difficult. [ESRS 2.77a]

**Metric 2** is calculated based on a methodology created by an external supplier specialised in risk assessment. This supplier calculated the ESG predicted score for critical suppliers, considering the country of operation, turnover and business area (identified through Metric 4). The main limitation of this assessment is the predictive nature of the ESG score. The assessment includes only suppliers within the scope of Secil's Procurement area. [ESRS 2.77a]

**Metric 3**, through the policy and the Code of Conduct, has two dimensions: a passive one, which involves including the Code of Conduct in all purchase orders sent to suppliers, and an active one, which requests suppliers to actively accept the Code of Conduct during the negotiation period or subsequently via email. Only suppliers within the scope of Secil's Procurement area are considered. [ESRS 2.77a]

Lastly, **metric 4** was calculated based on the creation of a process jointly developed by the different business units (Tunisia, Lebanon, Brazil and Portugal), where most of Secil's business activities within the Procurement scope are concentrated. The methodology followed GCCA guidelines regarding the impact of supplier categories across each ESG pillar, while also considering expenditure by category and supplier. The limitation of this methodology is that it does not take into account the actions implemented by suppliers to minimise their impacts. The critical suppliers considered are only those falling within the scope of Secil's Procurement area. [ESRS 2.77a]

Through these targets, we aim to achieve several benefits for value chain workers. In particular, Target 1 is aligned with internationally recognised commitments and various standards and policies, such as the Health and Safety Policy, the Safety Framework, local occupational health and safety regulations, the International Labour Organization (ILO) Occupational Safety and Health Convention (C155), ISO 45001, the United Nations Global Compact and Industry Codes of Practice. Its main objective is to strengthen health and safety awareness. [S2.39 | AR45c]

Accordingly, we aim to reduce workplace injuries and fatalities, strengthen worker protection through improved training practices and PPE, reinforce a safety culture and create a safer working environment. Ultimately, all these measures seek to promote well-being, increase job satisfaction and ensure long-term career sustainability. [S2.39 | AR45a] The definition and methodology used to establish these health and safety targets have remained consistent since 2020, enabling effective comparability and ensuring continuity of efforts over time. [S2.39 | AR45b]

### 3.1.3.3. ESRS S3 – Affected Communities

#### STRATEGY

#### **SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with the strategy and business model**

Description	Impact, Risk or Opportunity	Time horizon	Location in the value chain	Related sub-topic or sub-sub-topic
[ESRS2.48a]	[ESRS2.48a]	[ESRS2.48ciii]	[ESRS2.48a]	
Promotion of the local economy, territorial cohesion and population retention (for example, in inland regions of countries) by generating decent jobs, improving infrastructure, investing in social well-being and ensuring respect for the cultural and environmental rights of communities, thereby contributing to improved living conditions and balanced regional development.	Positive impact	--	Own operations	Communities' economic, social and cultural rights

Note: The material impacts identified are actual impacts and therefore do not have an associated time horizon.

Secil believes that sustainability is an intrinsic pillar of its business strategy, representing an essential factor for differentiation, revenue generation and value creation, while seeking to develop its activities without compromising strong environmental and social foundations.

The extractive nature of its industrial activity entails a social scope of action that encompasses both the people actively working with the company and the surrounding communities. These communities are the first link in the chain to experience the impacts of Secil's industrial activities. For this reason, the company invests in social responsibility, ensuring that its presence has a positive impact on the quality of life of its employees and surrounding communities.

Following the double materiality assessment, Secil identified a material positive impact on the communities affected by its operations. This impact is aligned with its strategy and business model of creating long-term value by contributing to the rural economy, territorial cohesion and population retention. As one of the main employers in many regions where it operates, Secil plays a significant role in local economic development. Its business model, which covers everything from the extraction of raw materials to the production and commercialisation of cement, concrete, mortars and aggregates, depends directly on a qualified, diverse and safe workforce, as well as sustainable relationships with local suppliers.

Secil promotes local hiring, ensuring fair working conditions, adequate remuneration and professional development opportunities for workers from local communities. This approach generates a real and positive impact on the communities in which it operates, reflected in (i) quality employment, (ii) the reduction of inequalities and (iii) the stimulation of local economic growth.



Additionally, the Group invests in technical and vocational training for employees and members of local communities, as well as in the inclusion of local suppliers within the production chain, thereby strengthening the economy of the communities where it operates [S3.8a-i | S3.9c]. This investment aims to enhance skills and improve employability in communities located near Secil's operations [S3.9c]. Furthermore, professional development, which not only benefits employees across different qualification levels, also enables the company to leverage human capital during strategic adaptations or restructuring processes, generating goodwill within local communities and among strategic partners. This contributes to a positive perception of Secil, while also facilitating understanding of its extractive, production and commercial practices [S3.8a-ii].

Secil also stands out through the implementation of social responsibility initiatives, including social, cultural and environmental projects developed in partnership with local communities. These initiatives aim to improve quality of life and are particularly relevant in areas closest to the company's operations [S3.9c].

The company considers several communities to be materially affected<sup>20</sup> by its operations and value chain. These include:

- (i) **Local communities in the vicinity of operations**, which live and/or work near quarries, plants and other company facilities. Secil prioritises local hiring and the creation of economic opportunities in these regions, promoting decent work and economic development;
- (ii) **Communities established along the value chain**, such as local suppliers and partners integrated into the supply chain, which benefit from sustainable and long-term business relationships;
- (iii) **Communities at the ends of the value chain**, including end consumers of Secil's products and raw material suppliers, both impacted by the company's sustainable demand and responsibility policies [S3.9a].

The Group adopts an integrated and cross-functional approach, ensuring that material impacts on these communities are monitored and managed responsibly [S3.9a], and includes in its disclosures all communities materially affected by its operations or value chain. Within the scope of reporting, no specific groups, whether geographical or otherwise, were excluded, with an inclusive and transparent approach being adopted in reporting its impacts [S3.9].

It should be noted that, in the materiality assessment, no risks or opportunities for Secil arising from impacts and dependencies related to affected communities [S3.8b | S3.9d | S3.11], nor associated negative impacts [S3.9b], were considered material. Nevertheless, outside this assessment exercise, the company recognises that communities located in the vicinity of industrial operations are directly impacted by the activities of these units. To mitigate these risks, the Group implements rigorous environmental control measures, carries out continuous monitoring and maintains transparent dialogue with communities through, for example, the Environmental Monitoring Committees (EMCs). These committees aim to monitor the environmental and social performance of Secil plants by analysing results and different activities, while also informing society about them. This initiative began in 2003 at the Outão plant in Portugal and was replicated at the Maceira-Liz facilities three years later. The internationalisation of the Environmental Monitoring Committee reached the Gabès plant in Tunisia in 2012 and the city of Adrianópolis in Brazil in 2015.

<sup>20</sup> Within the context of Secil's operations, no directly affected Indigenous communities were identified [S3.9].



## Environmental Monitoring Committee

Secil has established, at its Adrianópolis and Pomerode plants in Brazil, and at the Maceira-Liz and Outão plants in Portugal, a mechanism for the regular engagement of stakeholders from the communities surrounding these industrial units, known as Environmental Monitoring Committees. These committees meet regularly, three or four times per year, with the aim of analysing the environmental and safety performance of the facilities, as well as sharing the expectations and needs of these communities.

This monitoring mechanism has been operating at the Secil Outão Plant since 2003, having held its 114th meeting, and at Maceira since 2006 (with 42 meetings held). In Adrianópolis and Pomerode, the mechanism has been in place since 2025, with 24 committees held in Adrianópolis and 13 in Pomerode.

These forums include representatives from central and local government authorities, educational institutions, healthcare units, environmental and local development associations, fire brigades and other relevant entities from each community. Company representatives are also present at the meetings, ranging from Board members to technical staff responsible for the departments involved in each topic under discussion.

In addition, specific matters, such as formal complaints or requests for information, when relevant, are shared with Management, which is responsible for ensuring that appropriate responses are provided to stakeholders.

The company also safeguards against potentially vulnerable socioeconomic contexts, particularly where there may be excessive economic dependence of these communities on its operations, creating risks in the event of a reduction or cessation of activities. In response to this risk, Secil promotes local economic diversification and invests in community development projects, aiming to reduce vulnerability and strengthen the economy of the regions in which it operates.

One example of this commitment is the support provided to the associative movement in Setúbal. Since 2003, the Secil-Outão Plant has supported the Associative Movement of the Municipality of Setúbal by annually financing a wide range of social solidarity, sports and cultural associations. In this municipality, Secil also contributes to the preservation of biodiversity in the Luiz Saldanha Marine Park, at the heart of the Arrábida Natural Park, through the BIOMARES Project Protocol established between Secil, CCMAR<sup>21</sup>, ICNF<sup>22</sup> and ISPA<sup>23</sup>.

Another example of community development projects in 2025 took place in Lebanon, where Sibline, a Group company, supported the community through a series of donations, namely contributions to a children's cancer centre and cement donations to municipalities, social associations and cemeteries in communities near Sibline.

In Brazil, the Pedro Queiroz Pereira Cultural Centre promotes free activities aimed at the Adrianópolis community. In 2025, the Pedro Queiroz Pereira Cultural Centre recorded 5,522 participants and organised 182 activities. In addition, at the operational units of Supremo Secil Cimentos, including external areas, production facilities and mining areas, the Open Doors Programme took place in 2025, offering students, residents and family members the opportunity to visit and learn about the company's industrial and operational facilities. In 2025, the Open Doors Programme welcomed 674 visitors across 29 visits.

<sup>21</sup> CCMAR - Centro de Ciência do Mar do Algarve

<sup>22</sup> ICNF - Instituto da Conservação da Natureza e das Florestas

<sup>23</sup> ISPA - Instituto Universitário de Ciências Psicológicas, Sociais e da Vida



In Tunisia, in Gabès, two community initiatives stood out in 2025: Secil Gabès' contribution to the renovation of the Paediatric Department of the Gabès Regional Hospital and the donation of school supplies to students from disadvantaged families [S3.10].

In this way, Secil understands that these communities require special attention and adapts its strategies and initiatives to promote sustainable development. By adopting this approach, the company seeks to establish a responsible and long-term relationship with the communities in which it operates [S3.10].

## MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

### S3-1 – Policies related to affected communities

Secil adopts a set of policies aligned with widely recognised international instruments, such as the United Nations (UN) Guiding Principles on Business and Human Rights, which guide corporate conduct in respecting and promoting Human Rights. In this way, we ensure that Secil's practices are aligned with these principles by implementing actions that safeguard and respect communities and their rights, including consultation and the active involvement of local populations in managing the impacts of activities [S3.17-1 | S3.16.a].

Within this context, through its Code of Conduct, Secil commits to recognising its responsibility towards the communities in which it operates and with which it engages, contributing to their progress and well-being (Chap. 3.1.4.1). Similarly, the Human Rights Policy establishes that respect for these rights constitutes a structuring principle for the Group and forms an integral part of its commitment to sustainable development. The company ensures compliance with applicable laws and regulations in the conduct of its activities, namely with regard to local communities. In addition, Secil adopts measures to minimise any negative impacts arising from its activities, taking into account the values, culture and traditions of those communities.

Through its Sustainability Policy, Secil reaffirms its commitment to balancing economic performance with environmental and social responsibility. This policy establishes clear objectives and prioritises actions aimed at contributing to sustainability. Within the scope of social responsibility, the Sustainability Policy also defines specific commitments and targets for local communities.

From a social perspective, Secil is dedicated to enriching the communities in which it operates by promoting job creation, local hiring and community engagement. In addition, it values talent, equal opportunities and the diversity of its employees, encouraging merit and offering fair and equitable remuneration.

For Secil, stakeholders are a key element in the development of its activities, including shareholders, employees, customers, suppliers, surrounding communities, authorities and partners. In this way, the Group recognises that its stakeholders are essential to the conduct of the business and therefore promotes channels that enable increasing engagement with the different actors impacted by its operations, who should be heard and involved in decision-making processes. The consultation of different stakeholders in defining how the Group manages its activities constitutes, under the terms set out in the Stakeholder Engagement Policy, a structuring principle of its operations and forms part of its commitment to sustainable development (Chap. 3.1.4.1). Within this policy, Secil undertakes several commitments regarding stakeholder engagement. Specifically with regard to communities, it establishes: (i) the promotion of ongoing engagement and identification of potential impacts on the surrounding communities in the areas where it operates; (ii) the enrichment of surrounding communities through job creation, local hiring and community involvement; and (iii) the contribution to improving the well-being of populations and promoting initiatives aimed at supporting the development not only of communities, but also of the regions in which the Group operates.



Secil also recognises that combating and preventing corruption are structuring principles of its commitment to sustainable development. Accordingly, the company and its employees undertake not to offer, promise or authorise undue advantages to any persons or entities with the aim of obtaining financial or non-financial benefits for themselves or third parties; not to accept advantages where such acceptance could compromise their current or future independence and impartiality in relation to the offeror or related entities; not to use donations or sponsorships as a means of exerting unlawful influence in order to obtain decisions that confer advantages upon them; not to make contributions to political parties; and to encourage the reporting of operations suspected of involving violations of standards and good practices through the usual reporting procedures or, alternatively, through Secil's Integrity Channel (Chap. 3.1.4.1).

Lastly, it should be noted that, during the reporting year, significant changes were made to the Sustainability Policy [AR9].

The following information is incorporated by reference to other sections of the non-financial information statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Human Rights Policy – Chap. 3.1.4.1, G1
- Code of Conduct – Chap. 3.1.4.1, G1
- Sustainability Policy [AR9] – Chap. 3.1.4.1, G1
- Stakeholder Engagement Policy – Chap. 3.1.4.1, G1
- Anti-Corruption Policy [S3.14] – Chap. 3.1.4.1, G1.

## ACTIONS AND RESOURCES

### **S3-4 – Taking action on material impacts on affected communities and approaches to managing material risks and pursuing material opportunities related to affected communities, and the effectiveness of those actions**

Through its influence in the regions where it operates, Secil promotes the active participation of local communities and implements various initiatives aimed at supporting their development, as well as the development of the regions in which it is present.

In 2025, the Group maintained its commitment to investing in communities, while also strengthening partnerships with local suppliers by prioritising local procurement. [ESRS 2.68a | S3.31]

As planned activities for the future, Secil intends to continue investing in the same actions implemented during the current year.

## Actions

	<b>Key actions</b>	<b>Status</b>	<b>Scope of action</b>	<b>Time horizon</b>	<b>Expected results/ effects</b>
	<b>[ESRS 2.68a]</b>	<b>[ESRS 2.68 e ESRS 2.69]</b>	<b>[ESRS 2.68b]</b>	<b>[ESRS 68c]</b>	<b>[ESRS 2.68a   ESRS 2.68e]</b>
<b>1</b>	Renovation of the Paediatric Department of the Gabès Regional Hospital	Completed	Tunisia, local communities of Gabès, and families benefiting from public healthcare services in Gabès	Short term	Full renovation of the paediatric area, improving comfort, safety and the quality of care provided to hundreds of children each year.
<b>2</b>	Donation of school supplies to students from disadvantaged families	Completed	Tunisia, local community of Gabès	Short term	Provision of essential school supplies to support academic success, reduce financial burden and ensure equal access to education at the beginning of the school year.
<b>3</b>	Pedro Queiroz Pereira Cultural Centre – Promotion of activities in areas such as education, sport and culture	Adopted	Brazil, local community of Adrianópolis	Ongoing	5522 participants and 182 activities carried out in 2025. Promotion of well-being, learning and social integration. Expanded free access to culture, education, recreation, sport and leisure.
<b>4</b>	Open Doors Programme	Adopted	Brazil, operational units of Supremo Secil Cimentos, including external areas, production facilities and mining areas	Ongoing	674 visitors welcomed and 29 guided visits conducted in 2025. Increased knowledge about the cement production process. Increased understanding among students regarding the company's different professional areas.
<b>5</b>	Donations to the children's cancer centre	Completed	Lebanon	Short term	Social inclusion and emotional support.
<b>6</b>	Donation of cement to municipalities, social associations and cemeteries	Completed	Lebanon, communities near Siblinge	Short term	Strengthening community engagement and local development.
<b>7</b>	BIOMARES Project Protocol (CCMAR/ ICNF/IPSA/Secil)	In progress	Portugal, Arrábida Natural Park	Medium term	Preservation of biodiversity in the Luiz Saldanha Marine Park, at the heart of the Arrábida Natural Park.
<b>8</b>	Protocols with the Setúbal Associative Community	Adopted	Portugal, Setúbal Associative Community, including Cultural, Sports and Social Solidarity Associations	Ongoing	Financial support for activities carried out by associations.
<b>9</b>	Hiring of local suppliers	Adopted	Conducted within own operations and upstream in the value chain. Involves suppliers and Secil.	Ongoing	In 2025, 70.3% of purchases made were from local suppliers.

Note: No material negative impacts associated with the Economic, Social and Cultural Rights of Communities were identified, only a positive impact; therefore, no remediation actions were identified. [ESRS 2.68d]



The implementation of the actions adopted and planned for the future contributes to economic growth driven by community development, the strengthening of the local economy and the stimulation of the labour market. This enables Secil to consolidate its position as an agent of social and economic transformation, promoting sustainable development in the regions where it operates [ESRS 2.68a].

As the impacts on the economic, social and cultural rights of communities are positive, no actions were taken to provide for, cooperate in or support the provision of remedies for people harmed by actual material impacts [ESRS 2.68d | S3.32b]. Investment in communities has maintained a central role in mitigating the impacts of Secil's industrial operations. Over recent years, the company has continued to follow the path established in 2020 towards doubling investment in communities by 2025, namely through strengthening local contributions such as support for associations, donations and collaboration protocols. [ESRS 2.68e] Accordingly, three types of resources have been allocated, namely financial contributions, employee volunteering and in-kind donations. [ESRS 2.69a | S3.32c] On the other hand, purchases made from local suppliers have fluctuated due to factors such as variations in demand, supply and market conditions. [ESRS 2.68e]

Regarding the resources allocated to managing the identified impact, Secil allocates financial resources for the implementation of the proposed objectives [S3.38]. The current financial resources assigned to the actions are related to the most significant amounts presented in the financial statements, namely: investment in communities under other operating expenses and losses; hiring of local suppliers under external supplies and services – operating activities/payments to suppliers; and hiring of local employees under personnel expenses – operating activities/payments to personnel [ESRS 2.69b].

## METRICS AND TARGETS

### S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Secil established one target related to affected communities: by 2025, it aimed to double the monetary value of investment in local communities [ESRS 2.80]. This investment is accounted for in three ways: (i) investment in communities in cash, (ii) investment in communities through goods/in kind and (iii) volunteering activities carried out by employees. Taking into account the historical trend of support provided in recent years, the target was defined within the context of increasing the level of support granted. [ESRS 2.80f]

## Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
[ESRS 2.77c   ESRS 2.80b]	[ESRS 2.80c   ESRS 2.80d]	[ESRS 2.75   ESRS 2.80b]	[ESRS 2.68J   ESRS 2.80J]	[ESRS 2.68J   ESRS 2.80J]	[ESRS 2.80b   ESRS 2.80e ]
<b>1</b> Double investment in local communities <sup>1</sup>	Investment in local communities (% of revenue): 0.15% Base year: 2020	Investment in local communities (% of revenue)	0.11%	0.11%	0.20%
N/A	N/A	Purchases made from local suppliers (%)	70.2%	89.2%	N/A
<b>2</b>					

Note 1: The target and the calculation method of the metric were adjusted compared to the previous year in order to be more closely aligned with internal objectives, and are now defined as a percentage of revenue [ESRS 2.80i | AR44b].

Note 2: The target does not have defined interim milestones [ESRS 2.80e].

These metrics are subject to external assurance within the scope of this report. [ESRS 2.77b]

**Target 1** covers the upstream and downstream value chain, as well as Secil’s own operations [ESRS 2.80c], and is directly related to the Sustainability Policy and the Stakeholder Engagement Policy previously described [ESRS 2.80a]. Its definition involved only the Executive Committee, Human Resources and the Group’s Institutional Communication department. [ESRS 2.80h | ESRS 2.80g]

The company’s performance against the target in the reporting year was 0.1% of revenue, falling short of the target of 0.2% of revenue to be achieved by 2025. Secil continues to monitor and regularly review its progress on this matter. [ESRS 2.80j]

In addition to the metric associated with the target mentioned above, another metric was also defined, relating to purchases made from local suppliers. [ESRS 2.77c]

### 3.1.4. Governance Information

#### 3.1.4.1. ESRS G1 – Business Conduct

##### STRATEGY

##### **SBM-3 (ESRS 2) – Material impacts, risks and opportunities and their interaction with the strategy and business model**

Description	Impact, Risk or Opportunity	Time horizon	Location in the value chain	Related sub-topic or sub-sub-topic
[ESRS2.48a]	[ESRS2.48a]	[ESRS2.48ciii]	[ESRS2.48a]	
The development of a responsible corporate culture enhances employees' sense of belonging, increasing their motivation and the company's retention capacity.	Positive impact	-	Own operations	Corporate culture
The use of artificial intelligence, robotics and IoT technologies in industrial processes (cybersecurity) may result in production losses.	Risk	Short term – Reporting year	Own operations	Corporate culture
The inability to defend the company's legitimate interests before regulators may affect their decisions, impacting the reduction of profits, revenues, cash flows and access to financing.	Risk	Short term – Reporting year	Own operations	Political engagement and lobbying activities
Robust anti-corruption practices contribute to a fairer and more transparent business environment.	Positive impact	-	Own operations	Corruption and bribery

Note: The material impacts identified are actual impacts and therefore do not have an associated time horizon.

##### MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

##### **G1-1 – Policies on Business Conduct, Corporate Culture and the Prevention of Corruption and Bribery**

Secil promotes business management grounded in integrity and transparency, in compliance with applicable laws, standards and regulations, while fostering ethical values among employees, customers and partners. In addition, Secil recognises that the development of a responsible corporate culture strengthens employees' sense of belonging, increasing their motivation and the company's retention capacity. Accordingly, we have developed a set of policies and actions aimed at guiding our conduct in this regard, ensuring that the commitments governing our activities are clear. [G1-1\_01; G1.9]

Secil Group emphasises the importance of integrity, ethics, responsibility and honesty in the conduct of its business and activities, having established a governance model that encompasses all geographies in which it operates. This model is also reflected in a set of Policies, mechanisms and instruments designed to ensure the transparency and integrity of the Group's practices and the internalisation of business ethics values at all levels and by all Secil employees, namely through its Human Rights Policy, Code of Conduct and Anti-Corruption Policy.

The policies in place also aim to ensure compliance with legislation and with the commitments undertaken towards stakeholders. Examples include the Competition Law Policy, the Stakeholder Engagement Policy, among others, which are presented below. [2.65d]

In the process of defining and implementing the following policies, internal stakeholders, namely the relevant Secil departments according to the matters concerned, were involved. [MDR-P\_01-06; ESRS 2.65e]

The five policies developed in 2023 — the Human Rights Policy, Anti-Corruption Policy, Anti-Money Laundering and Counter-Terrorist Financing Policy, Competition Law Policy and Stakeholder Engagement Policy — aim to address the commitments undertaken by Secil with regard to applicable 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 fundamental ILO conventions and the International Bill of Human Rights. [MDR-P\_65d | ESRS 2.65d]

The policies and codes of Secil Group are detailed below. [G1.MDR-P\_01-06 | G1-1.7 | ESRS 2.65]

## I. Corporate Culture and Business Conduct

### Policies

<b>Document</b> [G1.7]	<b>Human Rights Policy</b>
<b>Key contents and objectives</b> [ESRS2.65a]	Expresses the commitment to promoting respect for Human Rights and labour rights and to fostering their observance.
<b>Scope</b> [ESRS2.65b]	Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. Also covers upstream value chain service providers. Applies to all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Human Resources Department
<b>Availability</b> [ESRS2.65f]	Communicated to all employees, business partners and other stakeholders through publication on Secil Group's institutional website. Training was provided to employees during 2025.

<b>Document</b> [G1.7]	<b>Code of Conduct</b>
<b>Key contents and objectives</b> [ESRS2.65a]	The Code of Conduct is the document that guides the behaviour of Employees (including members of corporate bodies and employees), establishing compliance with high standards of business ethics and personal integrity in the performance of their activities.
<b>Scope</b> [ESRS2.65b]	Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. Applies to all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Human Resources Department
<b>Availability</b> [ESRS2.65f]	Communicated to all Employees, business partners and other stakeholders through publication on the corporate website. It is also communicated through awareness-raising actions and periodic training. Training was provided to employees during 2025.

**Document**

[G1.7]

**Stakeholder Engagement Policy**

<b>Key contents and objectives</b> [ESRS2.65a]	This policy aims to demonstrate recognition of and commitment to its stakeholders. Their consultation in defining how the Group's activities are managed constitutes a structuring principle of its operations and enables increasing engagement with the different actors impacted by Secil's operations.
<b>Scope</b> [ESRS2.65b]	Covers the entire value chain, impacting members of corporate bodies, committee members, Secil employees and representatives. Applies to all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Department responsible for engagement with the respective Stakeholder.
<b>Availability</b> [ESRS2.65f]	Communicated to all employees, business partners and other stakeholders through publication on Secil Group's website. Training was provided to employees during 2025.

**Document**

[G1.7]

**Competition Law Policy**

<b>Key contents and objectives</b> [ESRS2.65a]	This policy aims to serve as a reference framework for conduct in competition matters, setting out the commitments undertaken in this area in order to ensure compliance with legal obligations relating to competition law and prevent anti-competitive practices.
<b>Scope</b> [ESRS2.65b]	Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. It also covers the downstream value chain. Applies to all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Commercial Department
<b>Availability</b> [ESRS2.65f]	Communicated to all employees, business partners and other stakeholders through publication on Secil Group's website and internet channels. Training was provided to employees during 2025.

**Document**

[G1.7]

**Anti-Fraud Policy**

<b>Key contents and objectives</b> [ESRS2.65a]	The policy describes the procedure to be followed in the event of fraud detection and identifies those responsible for fraud prevention and detection.
<b>Scope</b> [ESRS2.65b]	Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. Applies to all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Internal Audit Department
<b>Availability</b> [ESRS2.65f]	Available on the Intranet. Training was provided to employees during 2025.

In 2025, training on the above-mentioned policies was delivered in e-learning format to all employees, regardless of location or role performed, through digital platforms. [G1-1.9]

**Document**  
[G1.7]

**Integrity Channel Policy**

<b>Key contents and objectives</b> [ESRS2.65a]	The irregularities reporting procedure set out in this policy regulates the procedures for the receipt, screening, handling and archiving of communications concerning irregular practices received by Secil Group in matters covered by its scope.
<b>Scope</b> [ESRS2.65b]	Covers activities throughout the entire value chain, impacting members of corporate bodies, committee members, Secil employees and representatives. Applies to all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Legal and Compliance Department
<b>Availability</b> [ESRS2.65f]	Communicated to all employees, business partners and other stakeholders through publication on Secil Group's website. It is also communicated through awareness-raising actions and periodic training.

The Integrity Channel constitutes the mechanism for reporting and handling irregularities, enabling the monitoring of compliance with the commitments undertaken in our policies [G1-1.9]. The Integrity Channel Policy ensures compliance with Law No. 93/2021 of 20 December, guaranteeing the existence of a secure and confidential whistleblowing channel and the protection of individuals reporting infringements [2.65d].

**Document**  
[G1.7]

**Sustainability Policy**

<b>Key contents and objectives</b> [ESRS2.65a]	Guides Secil Group in its commitment to sustainability and in its objective of achieving a balance between economic performance, environmental protection and social responsibility. It defines the Group's objectives and priorities, focusing on the integration of environmental, social, governance and economic aspects into its sustainable practices.
<b>Scope</b> [ESRS2.65b]	Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. It also covers all stakeholders upstream and downstream in the value chain. Applies to all geographies and business areas of the Group.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Sustainability Department
<b>Availability</b> [ESRS2.65f]	Communicated to all employees, business partners and other stakeholders through publication on Secil Group's website.

The Sustainability Policy developed in 2018 was revised in 2025 to ensure alignment with the company's strategy and sustainability framework. The main revisions ensured greater consistency with the topics defined within the framework. The topic of water was also added to the policy, reinforcing Secil's ambition associated with this topic.

## II. Prevention of Corruption and Bribery

### Document

[G1.7]

### Anti-Corruption Policy

#### Key contents and objectives [ESRS2.65a]

The Anti-Corruption Policy establishes commitments regarding the fight against and prevention of corruption, namely not offering, promising or authorising undue advantages to any persons or entities with the aim of obtaining financial or non-financial benefits for themselves or third parties; not accepting advantages where such acceptance could compromise their independence and impartiality; not using donations or sponsorships as a means of exerting unlawful influence in order to obtain decisions that confer advantages upon them; and not making contributions to political parties.

#### Scope [ESRS2.65b]

Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. It also covers upstream value chain service providers. Applies to all geographies and business areas of the Group.

#### Most senior level responsible for implementation [ESRS2.65c]

Legal and Compliance Department

#### Availability [ESRS2.65f]

Communicated to all Employees, business partners and other stakeholders through publication on Secil Group's institutional website. Training was provided to employees during 2025.

### Document

[G1.7]

### Anti-Money Laundering and Counter-Terrorist Financing Policy

#### Key contents and objectives [ESRS2.65a]

This policy constitutes a reference framework for conduct regarding the prevention of money laundering and terrorist financing, taking into account the context and specificities of the respective activity, in compliance with applicable laws and regulations.

#### Scope [ESRS2.65b]

Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. It also covers upstream value chain service providers. Applies to all geographies and business areas of the Group.

#### Most senior level responsible for implementation [ESRS2.65c]

Legal and Compliance Department

#### Availability [ESRS2.65f]

Communicated to all employees, business partners and other stakeholders through publication on Secil Group's website. Training was provided to employees during 2025.

### III. Cybersecurity

Due to the growing increase in cybersecurity attacks, which may jeopardise the use of technologies connected to Information and Operational systems and consequently lead to potential production losses, we have established policies that guide our actions, such as the Remote Access Policy, Asset Management Policy, Rack Management Policy and Security Incident Management Policy.

Within the Information Technology area, and in the case of the Remote Access, Asset Management and Rack Management Policies, in addition to Secil's involvement, the process of defining and implementing these policies also included the support of an external consulting company.

#### Document

[G1.7]

#### Remote Access Policy

<b>Key contents and objectives</b> [ESRS2.65a]	The policy aims to establish rules for remote access to Secil's information systems for external entities and employees, safeguarding secure access to such systems.
<b>Scope</b> [ESRS2.65b]	Covers own operations, impacting members of corporate bodies, committee members, Secil employees and representatives. Applicable in Portugal.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Information Technology Department / Cybersecurity Area
<b>Availability</b> [ESRS2.65f]	Available through an internal Secil channel (SeSuite).

#### Document

[G1.7]

#### Asset Management Policy

<b>Key contents and objectives</b> [ESRS2.65a]	This policy establishes the rules and standards for Secil's information systems assets regarding identification, inventory and criticality.
<b>Scope</b> [ESRS2.65b]	Covers own operations and impacts members of corporate bodies, committee members, Secil employees and representatives. Applicable in Portugal.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Cybersecurity Department
<b>Availability</b> [ESRS2.65f]	Available through an internal Secil channel.

#### Document

[G1.7]

#### Rack Management Policy (technical cabinets)

<b>Key contents and objectives</b> [ESRS2.65a]	The policy establishes rules to ensure the integrity of technical cabinets, namely regarding access security and organisation.
<b>Scope</b> [ESRS2.65b]	Covers upstream activities, own operations and downstream activities, impacting members of corporate bodies, committee members, Secil employees and representatives. Applicable in Portugal.
<b>Most senior level responsible for implementation</b> [ESRS2.65c]	Cybersecurity Department
<b>Availability</b> [ESRS2.65f]	Available through an internal Secil channel.

**Document**

**[G1.7]**

**Security Incident Management Policy**

**Key contents and objectives**  
[ESRS2.65a]

The policy establishes guidelines, requirements and responsibilities for the detection, response and recovery from incidents that may compromise the confidentiality, integrity and availability of the organisation's IT and OT systems. It aims to ensure a structured and effective approach to incident management, reducing operational, financial and reputational impacts, while ensuring compliance with applicable security standards and regulatory requirements.

**Scope**  
[ESRS2.65b]

Applies to all employees, service providers, partners and third parties. Covers upstream activities, own operations and downstream activities. Applicable in Portugal.

**Most senior level responsible for implementation**  
[ESRS2.65c]

Cybersecurity Department

**Availability**  
[ESRS2.65f]

Available through an internal Secil channel.

**G1-3 – Prevention and detection of corruption and bribery**

Confidential and protected reporting of allegations of corruption or bribery, as well as whistleblowing reports, may be submitted through the Integrity Channel, available on the intranet and on Secil Group's website. In 2025, Secil prepared the implementation of the Regulatory Compliance Programme for the Prevention of Corruption and Related Offences, comprising the Corruption and Related Offences Risk Prevention Plan (PPR), the RGPC Code of Conduct, the Training Programme and the Integrity Channel itself. Approval and implementation of this programme are planned for 2026.

The PPR identifies and classifies corruption risks across all organisational units and defines preventive and corrective measures, such as training actions, gift registers, internal and external audits, declarations of conflicts of interest and segregation of duties, while the Code of Conduct establishes principles of ethics and integrity, prohibited conduct and reporting duties. The Compliance Officer is responsible for monitoring the implementation and effectiveness of the measures, preparing annual and interim reports, and proposing revisions to the PPR. [G1-3.18a]

Communications received through the Integrity Channel are handled with full confidentiality and may involve external consultants, investigators or appointed inquiry committees, which are always separated from the management chain involved and are not under the direct hierarchy of the departments subject to the report. This ensures the impartiality of the process. The results of investigations and PPR assessments are reported to the Board of Directors and the Executive Committee through annual and interim reports prepared by the Compliance Officer. [G1-3.18b; 18c]

In 2025, Secil provided employees with training on the Anti-Corruption Policy through an immersive e-learning training programme. This e-learning programme includes case studies, practical exercises and decision-making simulations, promoting active and contextualised learning of the Group's policies. In this way, we ensure that each employee understands not only the content of the policies, but also their application in day-to-day professional activities, reinforcing the culture of integrity, safety and responsibility that characterises Secil. [G1-3.19; 20]

It is also planned for 2026 that the Ethics, Integrity and Prevention of Corruption and Related Offences Risks Training Programme will be launched. This programme will be mandatory for all employees and managers of Secil – Companhia Geral de Cal e Cimento, S.A., Secil Betão, S.A., Secil Agregados, S.A., Betotrans II, Unipessoal, Lda and Seciltek, S.A. At the end of the training, participants should be able to identify corruption and related offence risks, understand the mandatory instruments of the General Regime for the Prevention of Corruption, understand the policies and procedures implemented, recognise the main offences and their respective consequences, adopt ethical and integrity-driven behaviours, and correctly answer at least 50% of the questions in a final quiz. [G1-3.19 | G1-3.20 | G1-3.21a | G1-3.21b]

Members of the management, executive and supervisory bodies will also attend, in 2026, the same mandatory training as the remaining employees, ensuring alignment of principles and practices across the organisation. [G1-3\_08 | 21c]

### **G1-5 – Political influence and lobbying activities**

There are codes in place that guide conduct within the Group in order to prevent any political influence. [G1-5\_02-08 | G1.29b] In line with this, Secil did not make any political contributions, whether direct or indirect (via intermediary organisations), regardless of whether these took the form of financial or in-kind support. [G1-5\_11 | G1-5.30] Furthermore, no members of the management, executive or supervisory bodies held comparable positions in public administration or regulatory entities during the two years preceding the reporting period (Chap. 3.1.1.2). [G1.29c]

At Secil Group, we collaborate with several national and international associations, both within the sector in which we operate and in the field of sustainability [MDR-A]. Membership in these associations is the means used to monitor all relevant matters and defend the Group's interests before regulators, with the aim of anticipating their decisions. This collaboration with associations addresses the risk identified for own operations, namely the reduction of profits, revenues, cash flows and access to financing that may result from the inability to defend the company's legitimate interests before these entities.

### **Material Impacts, Risks and Opportunities**

Among the associations of which Secil is a member, the main ones include GCCA, CEMBUREAU, ATIC, BCSD and GRACE, within which working groups are carried out that are directly related to the topics and material IROs for Secil. [G1-5\_09 | G1-5.29c]

Main Interest Groups	Main material IROs addressed	Secil's involvement
<p><u>GCCA – Global Cement and Concrete Association</u> Aims to drive the cement and concrete industry and improve the sector's socio-environmental responsibility worldwide.</p>	<ul style="list-style-type: none"> <li>• CO<sub>2</sub> and decarbonisation strategy, including innovation and the development of new technologies;</li> <li>• Health and Safety;</li> <li>• Biodiversity;</li> <li>• Water;</li> <li>• Circular Economy.</li> </ul>	<p>Since its establishment in 2018, Secil Group has been a member, sharing its objectives and continuing the work initiated by the CSI – Cement Sustainability Initiative, an association founded in 1999, which Secil joined in 2003 to address the increasing sustainability challenges faced by the cement industry.</p>
<p><u>CEMBUREAU – The European Cement Association</u> Organisation representing the cement industry in Europe. This association acts as the voice of the cement industry before European Union institutions, as well as other public authorities.</p>	<ul style="list-style-type: none"> <li>• CO<sub>2</sub> and decarbonisation strategy, including innovation and the development of new technologies;</li> <li>• Health and Safety;</li> <li>• Biodiversity;</li> <li>• Circular Economy.</li> </ul>	<p>As ATIC's representative member within CEMBUREAU, Secil Group follows the strategic directions established by the European association, namely with regard to carbon neutrality and the transition to a circular economy, among other sustainability objectives.</p>
<p><u>ATIC – Associação Técnica da Indústria de Cimento</u> (Technical Association of the Cement Industry) Created to represent the Portuguese cement industry and promote the better use of cement.</p>	<ul style="list-style-type: none"> <li>• CO<sub>2</sub> and national decarbonisation strategy, including innovation and the development of new technologies;</li> <li>• Health and Safety;</li> <li>• Biodiversity;</li> <li>• Circular Economy.</li> </ul>	<p>As a member of ATIC since its foundation in the 1960s, Secil Group follows the path defined by the Portuguese organisation for the cement industry to achieve net-zero emissions across the cement and concrete value chain.</p>
<p><u>BCSD Portugal</u> Supports Portuguese companies on their sustainability journey, inspiring and helping them to build organisations and business models that are competitive, innovative and sustainable.</p>	<ul style="list-style-type: none"> <li>• Climate Change;</li> <li>• Circular Economy;</li> <li>• Value Chain;</li> <li>• Biodiversity;</li> <li>• DEI.</li> </ul>	<p>Secil has been a member of BCSD since 2003 and is involved in five working groups, namely: Biodiversity; Value Chain and Circular Economy; Climate and Energy; Diversity, Equity and Inclusion (DEI); and Sustainable Reporting and Finance.</p>
<p><u>GRACE – Empresas Responsáveis</u> (Responsible Companies) Non-profit association whose mission is to promote and develop a sustainable corporate culture. Founded in 2000, this Portuguese business association is part of the European EVPA and CSR Europe networks, leaders in sustainability and corporate responsibility. These international platforms support industry sectors and companies globally in transformation processes and in the pursuit of practical solutions for <u>sustainable growth</u>.</p>	<ul style="list-style-type: none"> <li>• Climate Action;</li> <li>• Water;</li> <li>• Nature – Biodiversity;</li> <li>• Future Workforce;</li> <li>• DEI.</li> </ul>	<p>Secil has been a member of GRACE since 2010, participating in its annual congress, thematic meetings and other events.</p>

Secil's representation was delegated by the Board of Directors to management positions [G1-5\_01 | G1-5.29a], which are responsible for its coordination and oversight.

Secil is not required to register in the EU Transparency Register, or in any equivalent transparency register in a Member State. [G1-5\_10 | G1.29d]

## ACTIONS AND RESOURCES

### I. Corporate Culture

In order to better understand and manage the risks associated with corporate culture, as well as to influence Group employees in the adoption of practices that promote compliant business conduct and ensure compliance with applicable legislation, we have defined a set of qualitative methodologies to address them. The status of these actions, which are located within own operations, is presented below: [ESRS 2.68b]

#### Actions

Main actions	Status	Scope of the action	Time horizon	Expected outcomes/effects
[ESRS 2.68a]	[ESRS 2.68 e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
Sustainability Committee <sup>24</sup>	Adopted	All geographies	Ongoing	4 Sustainability Committee meetings held in 2025.
This is Us – Training on the following policies: Human Rights; Code of Conduct; Anti-Corruption; Anti-Money Laundering and Counter-Terrorist Financing; Competition Law; Stakeholder Engagement; Anti-Fraud	Adopted	All geographies	Ongoing	Employees' familiarity with the policies ensured.
Review of the double materiality assessment	Completed	All geographies	Short term	Updated list of IROs.
Publication of the Annual Report	Adopted	All geographies	Ongoing	Publication of the report, available to all stakeholders. Provision of high-quality information to stakeholders. Alignment with European sustainability reporting standards and industry standards.
Internal and external sustainability communications	Adopted	All geographies	Ongoing	Greater awareness among external and internal stakeholders regarding Secil's sustainability strategy and its implementation.
Monitoring the implementation of the stakeholder engagement plan	Adopted	All geographies	Ongoing	Monitoring of the company's engagement with its stakeholders, ensuring a structured and continuous dialogue aligned with sustainability and business objectives.
Preparation of the Sustainability Strategy for the new strategic cycle	In progress	All geographies	Medium term	Review of the results achieved during the Ambition strategic cycle and reflection on the new 2026–2030 strategic cycle.
Launch of the Secil Governance Handbook	Completed	All geographies	Short term	Consolidation of a clear and coherent Group governance model.

<sup>24</sup> For further information regarding the Sustainability Committee, please refer to Chapter 3.1.1.2. Sustainability Governance.

For the implementation of the sustainability management process (which includes target setting, follow-ups, double materiality assessments and the respective reporting) [ESRS 2.77c], a set of activities was carried out across own operations in all geographies [ESRS 2.68a | ESRS 2.68b], impacting different stakeholders. In this context, the Sustainability Committee, held on a quarterly basis, monitors the progress of projects and defined targets, providing guidance in cases where deviations from expected outcomes are identified.

The training provided during 2025 to employees across all geographies on the core policies approved and planned by the Board of Directors in 2024 [ESRS 2.68a | ESRS 2.68c] reinforced the values of ethics and integrity embedded in Secil's culture, promoting greater alignment with the Group's values and strengthening employees' sense of belonging. In addition, increased awareness of the policies is expected to contribute to reducing non-compliance, fostering a culture of integrity, respect and ethics. [G1.MDR-A | ESRS 2.68a]

In this context, the ESG Compliance Training should be highlighted. The This Is Us – Code of Conduct and Secil Policies training programme was implemented across the entire Group. The objective of the training was to communicate to Secil Group employees the contents of the Group's Code of Conduct and the Human Rights, Tax, Anti-Corruption, Anti-Money Laundering and Counter-Terrorist Financing, Competition Law, Stakeholder Engagement and Anti-Fraud policies.

Within the scope of the stakeholder engagement plan, a target with quarterly monitoring was defined. [S1.47] The stakeholder engagement plan is linked to the Stakeholder Engagement Policy and seeks to address several topics, such as Social Dialogue, for example. [S1.46 | ESRS 2.80a]

The publication of the annual report allows Secil to report its environmental, social and economic performance, while also disclosing its governance practices in a clear and transparent manner to all stakeholder groups.

In turn, sustainability communications – both internal, carried out through the Secil Connect channels and email, and external, through the website and LinkedIn – are directed at employees in the first case, and customers and other stakeholder groups in the second. These communications help raise awareness of sustainability-related topics, while also showcasing all the work, projects and initiatives developed in the area of Sustainability.

In 2025, a review was carried out of the impacts, risks and opportunities assessment conducted in 2024, with the aim of more deeply integrating the perspective of the Group's geographies. As a result of this review, a new material topic – corruption and bribery – was identified and added, and is reflected and reported in this report.

In 2025, Secil strengthened the maturity of its governance system through the launch of the Secil Governance Handbook, developed under the leadership of the Human Resources area and shared across the entire organisation. This reference framework consolidated a clear and coherent Group governance model, promoting an integrated view of the responsibilities, principles and decision-making mechanisms that guide the activities of the different geographies and business units. By clarifying the interaction between functions, processes and structures, and by bringing together critical information in an accessible repository, the Secil Governance Handbook promotes transparency, consistency and organisational collaboration, contributing to governance effectiveness and to sustainable management aligned with the corporate mission and vision. The document describes the mission and responsibilities of the macrostructure and Group functions, the RAPID governance matrix, and the RACI matrix outlining the relationship model between areas and the management cadence..

For the actions defined, further details regarding the financial and allocated resources are provided in the financial section of this document, namely in the Income Statement section. [ESRS 2.69a | ESRS 2.69b | ESRS 2.69c]

## II. Prevention of Corruption and Bribery

Within the scope of the Prevention of Corruption and Bribery topic, the following positive material impact was identified: “Robust anti-corruption practices contribute to a fairer and more transparent business environment”. In order to address this topic, several actions have been developed and adopted with the aim of strengthening practices for the prevention and mitigation of corruption risks, ensuring compliance with regulatory requirements and Secil’s ethical principles, as well as compliance with applicable ethical and regulatory standards. [ESRS 2.68 | ESRS 2.69]

### Actions

Main actions	Status	Scope of the action	Time horizon	Expected outcomes/ effects
[ESRS 2.68a]	[ESRS 2.68 e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
Training on the Anti-Corruption Policy (part of the This is Us training programme) <sup>25</sup>	Adopted	All geographies	Ongoing	Employees’ familiarity with the policies ensured.
Implementation of the Regulatory Compliance Programme for the Prevention of Corruption and Related Offences <sup>26</sup>	Planned	Portugal	Medium term	Prevention of corruption and compliance with the law.

## III. Cybersecurity

### Actions

In 2025, a set of activities aimed at addressing several defined actions was carried out. [ESRS 2.68c]

Main actions	Status	Scope of the action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68 e ESRS 2.69]	[ESRS 2.68b]	[ESRS 68c]	[ESRS 2.68a   ESRS 2.68e]
Phishing simulation	Adopted	Employees in Portugal	Ongoing	5377 phishing simulation emails sent; approximately 25% compromise rate (number of clicks on emails).
Phishing awareness training for users	Adopted	Employees in Portugal	Ongoing	Approximately 520 employees attended the training, which included a phishing questionnaire at the end.
Cyber crisis simulation training (ransomware)	Completed	Employees in Portugal	Short term	Approximately 10 employees attended the training.
Incident handling aligned with the Security Incident Management Policy	Completed	Portugal	Short term	A cybersecurity incident management tool aligned with the policy was implemented and is already operational. A total of 17 incidents were handled in 2025. <sup>27</sup>

The use of artificial intelligence, robotics and IoT technologies in industrial processes (cybersecurity), which may result in production losses, was addressed in 2025 through a set of actions directed at employees in Portugal, such as phishing awareness training, phishing simulations and cyber crisis simulation training. [G1.MDR-A | ESRS 2.68a]

<sup>25</sup> For further information regarding this action, please refer to the section above.

<sup>26</sup> For further information regarding this action, please refer to section G1-3 – Prevention and detection of corruption and bribery.

<sup>27</sup> Incident handling aligned with the policy began in December 2025.

## METRICS AND TARGETS

As a way of monitoring Secil Group’s performance regarding material IROs, metrics and targets were defined and monitored, with stakeholder involvement in their definition. Preparation meetings/ workshops were held among the various stakeholders involved, and the targets were approved by the Global Management Team (GMT), comprising the Executive Committee, the CEOs of the geographies and the Human Resources area. Monitoring of results and deviations from the established targets is carried out through the Sustainability Committee. [ESRS 2.77c | 2.80h]

With regard to the targets established, no changes were made to values, baseline year, calculation methodology, data collection methods or assumptions during the reporting period. [ESRS 2.80i]

### I. Corporate Culture and Business Conduct

In the case of corporate culture, metrics are used to monitor the identified IRO. One metric is related to employee satisfaction, through the eNPS (employee Net Promoter Score), which aims to monitor the impact of developing a responsible corporate culture that strengthens employees’ sense of belonging, increasing their motivation and the company’s retention capacity. [ESRS 2.77c]

#### Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
[ESRS 2.77c   ESRS 2.80b]	[ESRS 2.80c   ESRS 2.80d]	[ESRS 2.75; ESRS 2.80b]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.80b   ESRS 2.80e   S2.39]
Improve employee satisfaction.	Reference value: 35 Base year: 2021	eNPS (Employee Net Promoter Score)	34 <sup>28</sup>	40 <sup>29</sup>	Between 36 and 40
Communication of the Governance structure to all employees.	N/A	N/A	Target achieved	Target achieved	Information available in the annual report and on Secil Group’s website
Organisational strategy: To have the sustainability strategy defined and an IRO assessment process implemented.	N/A	N/A	Sustainability strategy defined and a process to assess IROs established.	Sustainability strategy defined and a process to assess IROs established.	Integration of the risks resulting from the IRO assessment process into the risk management process implemented by 2026

<sup>28</sup> The 2024 eNPS resulted from a Pulse survey, a shorter survey with fewer questions and a sample of the employee population, which serves as a pulse check of employee satisfaction in years when climate surveys are not conducted.

<sup>29</sup> The 2025 eNPS resulted from a Pulse survey, a shorter survey with fewer questions and a sample of the employee population, which serves as a pulse check of employee satisfaction in years when climate surveys are not conducted. In March 2025, an eNPS result of 28 was obtained from the climate survey involving the entire employee population.

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	2025 Target
[ESRS 2.77c   ESRS 2.80b]	[ESRS 2.80c   ESRS 2.80d]	[ESRS 2.75; ESRS 2.80b]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.68J; ESRS2.80J]	[ESRS 2.80b   ESRS 2.80e   \$2.39]
Ethics and compliance: Definition, implementation and communication of a set of policies contributing to corporate culture.	N/A	N/A	Target achieved	Target achieved	To have a set of policies implemented that contribute to corporate culture.
To have a stakeholder engagement plan defined.	N/A	N/A	Plan defined for Portugal, Brazil and corporate level. Awaiting results from Tunisia and Lebanon.	Target achieved	To have a stakeholder engagement plan defined.

All targets defined cover all geographies of Secil Group at the level of own operations. [ESRS 2.80c]

**Employee Satisfaction**, measured through the eNPS, reflects employee engagement and satisfaction, promoting inclusive working environments [ESRS 2.80f]. It is calculated based on the response to the question: “How likely are you to recommend the company to family and friends as a good place to work?”, ranging from -100 to 100. Responses are collected and processed through a platform and an external entity and may range from 0 (not at all likely) to 10 (extremely likely). All Secil Group employees across the different geographies are surveyed [ESRS 2.77a | ESRS 2.80f], and performance analysis is carried out and monitored within each geography, implying the development of action plans targeted at the identified improvement opportunities, which are monitored locally.

In 2025, eNPS Pulse score reached 40 points, representing a positive evolution compared with the 2024 eNPS Pulse score. The overall eNPS score, obtained from the climate survey involving the entire employee population, reached 28 points in March 2025. Compared with the last Organisational Climate survey involving the entire employee population, conducted in 2023, there was a positive evolution in the Group’s eNPS (Employee Net Promoter Score), increasing from 24 (2023) to 28 (2025), a result considered good according to the benchmark. Secil has an Organisational Climate action plan with defined actions aimed at improving the eNPS.

This metric is expressed in absolute terms, and its determination involved the participation of internal stakeholders. For the remaining targets defined, qualitative indicators are used to monitor these topics. [ESRS 2.80b]

The targets defined take into consideration the broader sustainable development context in which Secil’s impacts occur. The communication of the corporate governance structure has an impact on corporate culture by fostering integrity and good governance practices. [ESRS 2.80f] The organisational strategy target also has a significant impact on Secil’s corporate culture, as it reinforces the integration of sustainability as a strategic pillar of the company.

**Sustainability management** structures and formalises Secil’s approach to sustainability as an important and cross-cutting area of the organisation, with an impact on corporate culture. Employees are involved in the sustainability strategy, promoting a more aligned, transparent and participatory working environment. In addition, the commitment undertaken is monitored through continuous follow-ups and reporting, which encourages organisational behaviour based on responsibility and continuous improvement.

The target defined within the scope of ethics and compliance promotes an environment of integrity and responsibility. The implementation of these policies strengthens corporate culture, as it establishes expected standards of behaviour, minimises risks and creates an organisational environment based on trust and integrity. Furthermore, by communicating and reinforcing these policies among employees and partners, Secil promotes a culture of collective responsibility and commitment to corporate sustainability. [ESRS 2.80f] It is related to several Secil policies, namely the Anti-Money Laundering and Counter-Terrorist Financing Policy, Competition Law Policy, Stakeholder Engagement Policy, Anti-Corruption Policy and Human Rights Policy. [ESRS 2.80a]

The Stakeholder Engagement Plan, monitored on a quarterly basis, highlights the priority given to stakeholder engagement in a structured manner. This plan is an essential tool for identifying and addressing the company’s impacts on local communities and beyond, promoting dialogue and collaboration that respect the values, needs and expectations of stakeholders. [S1.46 | ESRS 2.80f | S1.47]

From the perspective of this engagement, particularly with employees, a close relationship is maintained with workers’ representatives, establishing agreements that reflect the commitment to respecting the Human Rights of its workforce. Although there are no indications of global framework agreements, the company has entered into specific agreements that promote employee well-being and reflect the integration of workers’ perspectives into decision-making processes. [S1.27d]

For the metrics and targets defined in this context, no interim targets were established [ESRS 2.80e], and none of the metrics disclosed above are validated by an external body other than the assurance provider. [ESRS 2.77b]

Additionally, none of the targets defined were based on scientific evidence. [ESRS 2.80g]

## II. Prevention of corruption and bribery

Secil does not tolerate any form of corruption, fraud, bribery or extortion, and has implemented a set of anti-corruption and anti-bribery training actions. These involved all employees identified as holding functions with a higher risk of corruption and bribery. Additionally, around 33% of members of the administrative, management and supervisory bodies received training on these topics.

[ESRS2.77c]

	<b>2025</b>
<b>Anti-corruption and anti-bribery training</b>	
Number of employees in functions at risk of corruption and bribery	162
Number of employees in functions at risk of corruption and bribery who received anti-corruption and anti-bribery training	148
Percentage of employees in function at risk who received anti-corruption and anti-bribery training	91 %
Percentage of members of the administrative, management and supervisory bodies who received anti-corruption and anti-bribery training	58 %

Furthermore, no convictions for breaches of anti-corruption and anti-bribery laws were identified during the reporting period [G1-4].

### III. Cybersecurity

[ESRS2.77c]

#### Metrics and Targets

Target	Baseline (reference value and base year)	Associated metric	2024 Performance	2025 Performance	Target and year
[ESRS 2.77c   ESRS 2.80b]	[ESRS 2.80c   ESRS 2.80d]	[ESRS 2.75   ESRS 2.80b]	[ESRS 2.68J   ESRS2.80J]	[ESRS 2.68J   ESRS2.80J]	[ESRS 2.80b   ESRS 2.80e]
N/A	N/A	Number of blocked cyberattacks	63 489 <sup>30</sup>	735 677	N/A

Within the scope of the cybersecurity topic, a metric was defined to account for the number of blocked cyberattacks. This value aims to assess the risk associated with the use of artificial intelligence, robotics and IoT technologies in industrial processes.

In the case of blocked cyberattacks, the calculation is carried out and extracted from the Microsoft Defender system used by Secil and refers to the blocking of phishing attempts, malware and access to malicious websites. However, this metric only began to be monitored during the last three months of 2024 and covers Portugal only. [ESRS 2.77a]

This metric – blocked cyberattacks – is expressed in absolute terms, and its determination involved the participation of internal stakeholders. [ESRS 2.80b]

<sup>30</sup>Blocked attacks during the last three months of 2024.

## 3.1.5. Annexes

### 3.1.5.1. Correspondence Tables [ESRS, WEF]

#### 3.1.5.1.1. LIST OF DISCLOSURE REQUIREMENTS UNDER THE ESRS COVERED BY THE COMPANY'S NON-FINANCIAL STATEMENT (IRO-2)

Disclosure requirement	Location
<b>ESRS 2 – General Disclosures</b>	
BP-1 – General basis for preparation of sustainability statements	Cap. 3.1.1.1 (BP-1)
BP-2 – Disclosures in relation to specific circumstances	Cap. 3.1.1.1 (BP-2)
GOV-1 – The role of the administrative, management and supervisory bodies	Cap. 3.1.1.2 (GOV-1)
GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Cap. 3.1.1.2 (GOV-2)
GOV-3 – Integration of sustainability-related performance in incentive schemes	Cap. 3.1.1.2 (GOV-3)
GOV-4 – Statement on due diligence	Cap. 3.1.1.2 (GOV-4)
GOV-5 – Risk management and internal controls over sustainability reporting	Cap. 3.1.1.2 (GOV-5)
SBM-1 – Strategy, business model and value chain	Cap. 3.1.1.3 (SBM-1)
SBM-2 – Interests and views of stakeholders	Cap. 3.1.1.3 (SBM-2)
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	Cap. 3.1.1.3 (SBM-3)
IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities	Cap. 3.1.1.4 (IRO-1)
IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Cap. 3.1.1.4 (IRO-2)
<b>E1 – Climate Change</b>	
ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive schemes	Cap. 3.1.1.2 (GOV-3)
E1-1 – Transition plan for climate change mitigation	Cap. 3.1.2.2 (E1-1)
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	Cap. 3.1.2.2 (SBM-3)
ESRS 2 IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities related to climate change	Cap. 3.1.1.4 (IRO-1)
E1-2 – Policies related to climate change mitigation and adaptation	Cap. 3.1.2.2 (E1-2)
E1-3 – Actions and resources in relation to climate change policies	Cap. 3.1.2.2 (E1-3)
E1-4 – Targets related to climate change mitigation and adaptation	Cap. 3.1.2.2 (E1-4)
E1-5 – Energy consumption and mix	Cap. 3.1.2.2 (E1-5)
E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	Cap. 3.1.2.2 (E1-6)
<b>E2 – Pollution</b>	
ESRS 2 IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities related to pollution	Cap. 3.1.1.4 (IRO-1)
E2-1 – Policies related to pollution	Cap. 3.1.2.3 (E2-1)
E2-2 – Actions and resources related to pollution	Cap. 3.1.2.3 (E2-2)
E2-3 – Targets related to pollution	Cap. 3.1.2.3 (E2-3)
E2-4 – Pollution of air, water and soil	Cap. 3.1.2.3 (E2-4)

Disclosure requirement	Location
<b>E3 – Water and marine resources</b>	
ESRS 2 IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities related to water and marine resources	Chap. 3.1.1.4 (IRO-1)
E3-1 – Policies related to water and marine resources	Chap. 3.1.2.4 (E3-1)
E3-2 – Actions and resources related to water and marine resources	Chap. 3.1.2.4 (E3-2)
E3-3 – Targets related to water and marine resources	Chap. 3.1.2.4 (E3-3)
E3-4 – Water consumption	Chap. 3.1.2.4 (E3-4)
<b>E4 – Biodiversity and ecosystems</b>	
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	Chap. 3.1.2.5 (SBM-3)
ESRS 2 IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities related to biodiversity and ecosystems	Chap. 3.1.1.4 (IRO-1)
E4-2 – Policies related to biodiversity and ecosystems	Chap. 3.1.2.5 (E4-2)
E4-3 – Actions and resources related to biodiversity and ecosystems	Chap. 3.1.2.5 (E4-3)
E4-4 – Targets related to biodiversity and ecosystems	Chap. 3.1.2.5 (E4-4)
E4-5 – Impact metrics related to biodiversity and ecosystems change	Chap. 3.1.2.5 (E4-5)
<b>E5 – Resource use and circular economy</b>	
ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Chap. 3.1.1.4 (IRO-1)
E5-1 – Policies related to resource use and circular economy	Chap. 3.1.2.6. (E5-1)
E5-2 – Actions and resources related to resource use and circular economy	Chap. 3.1.2.6. (E5-2)
E5-3 – Targets related to resource use and circular economy	Chap. 3.1.2.6. (E5-3)
E5-4 – Resource inflows	Chap. 3.1.2.6. (E5-4)
E5-5 – Resource outflows	Chap. 3.1.2.6. (E5-5)
E5-6 – Anticipated financial effects from resource use and circular economy-related risks and opportunities	Chap. 3.1.2.6. (E5-6)
<b>S1 – Own workforce</b>	
ESRS 2 SBM-2 – Interests and views of stakeholders	Chap. 3.1.1.3 (SBM-2)
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	Chap. 3.1.3.1 (SBM-3)
S1-1 – Policies related to own workforce	Chap. 3.1.3.1 (S1-1)
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	Chap. 3.1.3.1 (S1-3)
S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Chap. 3.1.3.1 (S1-4)
S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Chap. 3.1.3.1 (S1-5)
S1-6 – Characteristics of the undertaking’s employees	Chap. 3.1.3.1 (S1-6)
S1-7 – Characteristics of non-employees in the undertaking’s own workforce	Chap. 3.1.3.1 (S1-7)
S1-8 – Collective bargaining coverage and social dialogue	Chap. 3.1.3.1 (S1-8)
S1-9 – Diversity metrics	Chap. 3.1.3.1 (S1-9)
S1-10 – Adequate wages	Chap. 3.1.3.1 (S1-10)
S1-13 – Training and skills development metrics	Chap. 3.1.3.1 (S1-13)
S1-14 – Health and safety metrics	Chap. 3.1.3.1 (S1-14)
S1-15 – Work-life balance metrics	Chap. 3.1.3.1 (S1-15)
S1-16 – Remuneration metrics (pay gap and total remuneration)	Chap. 3.1.3.1 (S1-16)
S1-17 – Incidents, complaints and severe human rights impacts	Chap. 3.1.3.1 (S1-17)

Disclosure requirement	Location
<b>S2 – Workers in the value chain</b>	
ESRS 2 SBM-2 – Interests and views of stakeholders	Chap. 3.1.1.3 (SBM-2)
ESRS 2 SBM-3 –Material impacts, risks and opportunities and their interaction with strategy and business model	Chap. 3.1.3.2 (SBM-3)
S2-1 – Policies related to value chain workers	Chap. 3.1.3.2 (S2-1)
S2-2 – Processes for engaging with value chain workers about impacts	Chap. 3.1.3.2 (S2-2)
S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns	Chap. 3.1.3.2 (S2-3)
S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	Chap. 3.1.3.2 (S2-4)
S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Chap. 3.1.3.2 (S2-5)
<b>S3 – Affected communities</b>	
ESRS 2 SBM-2 – Interests and views of stakeholders	Chap. 3.1.1.3 (SBM-2)
ESRS 2 SBM-3 –Material impacts, risks and opportunities and their interaction with strategy and business model	Chap. 3.1.3.3 (SBM-3)
S3-1 – Policies related to affected communities	Chap. 3.1.3.3 (S3-1)
S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Chap. 3.1.3.3 (S3-4)
S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunitie	Chap. 3.1.3.3 (S3-5)
<b>G1 – Business Conduct</b>	
ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies	Chap. 3.1.1.2 (GOV-1)
ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Chap. 3.1.1.4 (IRO-1)
G1-1 – Business conduct policies and corporate culture	Chap. 3.1.4.1 (G1-1)
G1-3 – Prevention and detection of corruption and bribery	Chap. 3.1.4.1 (G1-3)
G1-4 – Incidents of corruption or bribery	Chap. 3.1.4.1 (G1-4)
G1-5 – Political influence and lobbying activities	Chap. 3.1.4.1 (G1-5)

### 3.1.5.1.2. List of datapoints derived from other EU legislation (IRO-2)

Disclosure requirement	Datapoint	Description	SFDR Reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Materiality
ESRS 2 GOV-1	Paragraph 21 (d)	Gender diversity of the Board of Directors	X	-	X	-	Chap. 3.1.1.2 (GOV-1)	
ESRS 2 GOV-1	Paragraph 21 (e)	Percentage of independent members of the Board of Directors	-	-	X	-	Chap. 3.1.1.2 (GOV-1)	
ESRS 2 GOV-4	Paragraph 30	Statement on due diligence	X	-	-	-	Chap. 3.1.1.2 (GOV-4)	
ESRS 2 SBM-1	Paragraph 40 (d) i	Involvement in activities related to fossil fuels	X	X	X	-	Chap. 3.1.1.3 (SBM-1)	
ESRS 2 SBM-1	Paragraph 40 (d) ii	Involvement in activities related to the production of chemical products	X	-	X	-	Chap. 3.1.1.3 (SBM-1)	
ESRS 2 SBM-1	Paragraph 40 (d) iii	Involvement in activities related to controversial weapons	X	-	X	-	Chap. 3.1.1.3 (SBM-1)	
ESRS 2 SBM-1	Paragraph 40 (d) iv	Involvement in activities related to the cultivation and production of tobacco	-	-	X	-	Chap. 3.1.1.3 (SBM-1)	
ESRS E1-1	Paragraph 14	Transition plan to achieve climate neutrality by 2050	-	-	-	X	Chap. 3.1.2.2 (E1-1)	
ESRS E1-1	Paragraph 16 (g)	Companies excluded from the Paris Agreement benchmark objectives	-	X	X	-	Chap. 3.1.2.2 (E1-1)	
ESRS E1-4	Paragraph 34	GHG emissions reduction targets	X	X	X	-	Chap. 3.1.2.2 (E1-4)	
ESRS E1-5	Paragraph 38	Energy consumption from fossil sources, disaggregated by source (high climate impact sectors only)	X	-	-	-	Chap. 3.1.2.2 (E1-5)	
ESRS E1-5	Paragraph 37	Energy consumption and mix	X	-	-	-	Chap. 3.1.2.2 (E1-5)	
ESRS E1-5	Paragraphs 40-43	Energy intensity associated with activities in high climate impact sectors	X	-	-	-	Chap. 3.1.2.2 (E1-5)	
ESRS E1-6	Paragraph 44	Gross Scope 1, 2, 3 and Total GHG emissions	X	X	X	-	Chap. 3.1.2.2 (E1-6)	

Disclosure requirement	Datapoint	Description	SFDR Reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Materiality
ESRS E1-6	Paragraphs 53-55	Gross GHG emissions intensity	X	X	X	-	Chap. 3.1.2.2 (E1-6)	
ESRS E1-7	Paragraph 56	GHG removals and carbon credits	-	-	-	X	-	Not material
ESRS E1-9	Paragraph 66	Exposure of the benchmark portfolio to climate-related physical risks	-	-	X	-	-	Not material
ESRS E1-9	Paragraph 66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk	-	X	-	-	-	Not material
ESRS E1-9	Paragraph 66 (c)	Location of significant assets at material physical	-	X	-	-	-	Not material
ESRS E1-9	Paragraph 67 (c)	Breakdown of the carrying value of its real estate assets by energy efficiency classes	-	X	-	-	-	Not material
ESRS E1-9	Paragraph 69	Degree of exposure of the portfolio to climate-related opportunities	-	-	X	-	-	Not material
ESRS E2-4	Paragraph 28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	X	-	-	-	Chap. 3.1.2.3 (E2-4)	
ESRS E3-1	Paragraph 9	Water and marine resources	X	-	-	-	Chap. 3.1.2.4 (E3-1)	
ESRS E3-1	Paragraph 13	Dedicated policy	X	-	-	-	Chap. 3.1.2.4 (E3-1)	
ESRS E3-1	Paragraph 14	Sustainable oceans and seas	X	-	-	-	-	Not material
ESRS E3-4	Paragraph 28 (c)	Total water recycled and reused	X	-	-	-	-	Not material
ESRS E3-4	Paragraph 29	Total water consumption in m3 per net revenue on own operations	X	-	-	-	Chap. 3.1.2.4 (E3-4)	
ESRS 2-SBM3 - E4	Paragraph 16 (a) i	Activities negatively affecting biodiversity sensitive areas	X	-	-	-	Chap. 3.1.2.5 (SBM-3)	
ESRS 2-SBM3 - E4	Paragraph 16 (b)	Material negative impacts with regards to land degradation, desertification or soil sealing	X	-	-	-	Chap. 3.1.2.5 (SBM-3)	

Disclosure requirement	Datapoint	Description	SFDR Reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Materiality
ESRS 2-SBM3 – E4	Paragraph 16 (c)	Operations that affect threatened species	X	-	-	-	Chap. 3.1.2.5 (SBM-3)	
ESRS E4-2	Paragraph 24 (b)	Sustainable land / agriculture practices or policies	X	-	-	-	Chap. 3.1.2.5 (E4-2)	
ESRS E4-2	Paragraph 24 (c)	Sustainable oceans / seas practices or policies	X	-	-	-	-	Not material
ESRS E4-2	Paragraph 24 (d)	Policies to address deforestation	X	-	-	-	-	Not reported
ESRS E5-5	Paragraph 37 (d)	Non-recycled waste	X	-	-	-	-	Not material
ESRS E5-5	Paragraph 39	Hazardous waste and radioactive waste	X	-	-	-	-	Not material
ESRS 2-SBM3 – S1	Paragraph 14 (f)	Risk of incidents of forced labour	X	-	-	-	Chap. 3.1.3.1 (SBM-3)	
ESRS 2-SBM3 – S1	Paragraph 14 (g)	Risk of incidents of child labour	X	-	-	-	Chap. 3.1.3.1 (SBM-3)	
ESRS S1-1	Paragraph 20	Human rights policy commitments	X	-	-	-	Chap. 3.1.3.1 (S1-1)	
ESRS S1-1	Paragraph 21	Due diligence policies on issues addressed by the fundamental ILO Conventions 1 to 8	-	-	X	-	Chap. 3.1.3.1 (S1-1)	
ESRS S1-1	Paragraph 22	Processes and measures for preventing trafficking in human beings	X	-	-	-	Chap. 3.1.3.1 (S1-1)	
ESRS S1-1	Paragraph 23	Workplace accident prevention policy or management system	X	-	-	-	Chap. 3.1.3.1 (S1-1)	
ESRS S1-3	Paragraph 32 (c)	Grievance/complaints handling mechanisms	X	-	-	-	Chap. 3.1.3.1 (S1-3)	
ESRS S1-14	Paragraph 88 (b) e (c)	Number of fatalities and number and rate of work- related accidents	X	-	X	-	Chap. 3.1.3.1 (S1-14)	
ESRS S1-14	Paragraph 88 (e)	Number of days lost to injuries, accidents, fatalities or illness	X	-	-	-	Chap. 3.1.3.1 (S1-14)	
ESRS S1-16	Paragraph 97 (a)	Unadjusted gender pay gap	X	-	X	-	Chap. 3.1.3.1 (S1-16)	
ESRS S1-16	Paragraph 97 (b)	Excessive chief executive pay ratio	X	-	-	-	Chap. 3.1.3.1 (S1-16)	

Disclosure requirement	Datapoint	Description	SFDR Reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Materiality
ESRS S1-17	Paragraph 103 (a)	Incidents of discrimination	X	-	-	-	Chap. 3.1.3.1 (S1-17)	
ESRS S1-17	Paragraph 104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	X	-	X	-	Chap. 3.1.3.1 (S1-17)	
ESRS 2-SBM3 – S2	Paragraph 11 (b)	Significant risk of child labour or forced labour in the value chain	X	-	-	-	Chap. 3.1.3.1 (SBM-3)	
ESRS S2-1	Paragraph 17	Human rights policy commitments	X	-	-	-	Chap. 3.1.3.1 (S2-1)	
ESRS S2-1	Paragraph 18	Policies related to value chain workers	X	-	-	-	-	Not material
ESRS S2-1	Paragraph 19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	X	-	X	-	Chap. 3.1.3.2 (S2-1)	
ESRS S2-1	Paragraph 19	Due diligence policies on issues addressed by the fundamental ILO Conventions 1 to 8	-	-	X	-	Chap. 3.1.3.2 (S2-1)	
ESRS S2-4	Paragraph 36	Human rights issues and incidents connected to its upstream and downstream value chain	X	-	-	-	Chap. 3.1.3.2 (S2-4)	
ESRS S3-1	Paragraph 16	Human rights policy commitments	X	-	-	-	Chap. 3.1.3.3 (S3-1)	
ESRS S3-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	X	-	X	-	Chap. 3.1.3.3 (S3-1)	
ESRS S3-4	Paragraph 36	Human rights issues and incidents	X	-	-	-	Chap. 3.1.4.1 (G1)	
ESRS S4-1	Paragraph 16	Policies related to consumers and end-users	X	-	-	-	-	Not material
ESRS S4-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	X	-	X	-	-	Not material
ESRS S4-4	Paragraph 35	Human rights issues and incidents	X	-	-	-	-	Not material
ESRS G1-1	Paragraph 10 (b)	United Nations Convention against Corruption	X	-	-	-	-	Not material
ESRS G1-1	Paragraph 10 (d)	Protection of whistle-blowers	X	-	-	-	-	Not material



Disclosure requirement	Datapoint	Description	SFDR Reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Materiality
ESRS G1-4	Paragraph 24 (a)	Fines for violation of anti corruption and anti-bribery laws	X	-	X	-	Chap. 3.1.4.1 (G1)	
ESRS G1-4	Paragraph 24 (b)	Standards of anti-corruption and anti-bribery	X	-	-	-	Chap. 3.1.4.1 (G1)	

### 3.1.5.1.3. List of disclosure requirements/datapoints incorporated by reference (BP-2)

Disclosure requirement	Código	Location
Description of the material impacts resulting from the materiality assessment (ESRS2.48a)	SBM-3	Chap. 3.1.1.2 (SBM-3) Chap. 3.1.1.3 (SBM-3) Chap. 3.1.2.2 (SBM-3)
Description of the material risks and opportunities resulting from the materiality assessment (ESRS2.48a)	SBM-3	Chap. 3.1.2.3 (SBM-3) Chap. 3.1.2.4 (SBM-3) Chap. 3.1.2.5 (SBM-3) Chap. 3.1.3.1 (SBM-3)
Disclosure of time horizons (ESRS2.48ciii)	SBM-3	Chap. 3.1.3.2 (SBM-3)
Disclosure of specification of impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by additional entity-specific disclosures (ESRS2.48h)	SBM-3	Chap. 3.1.3.3 (SBM-3) Chap. 3.1.1.4 (SBM-3)
A description of significant groups of products and/or services offered and significant markets (ESRS 2.40a-i/ii)	SBM-1	Chap. 3.1.1.3 (SBM-1)
Minimum Disclosure Requirements for Policies: - General presentation of the policies	MDR-P	*
Number of salaried employees by geographical area/country (ESRS 2.40a-iii)	ESRS 2.40a-iii	Chap. 3.1.3.1 – Characteristics of the undertaking’s employees (S1-6)

\* Considering that Secil has several policies that are referenced multiple times throughout the chapters, in order to avoid redundant information, references to those policies were made through text at the end of the policy sections. Given their large number, they are not presented in this table.

### 3.1.5.1.4. STATEMENT ON DUE DILIGENCE (GOV-4)

Core elements of due diligence	Points of the sustainability statement	Location
Integrating due diligence into governance, strategy and the business model	ESRS 2 GOV-2	Chap. 3.1.1.2 (GOV-2)
	ESRS 2 GOV-3	Chap. 3.1.1.2 (GOV-3)
	ESRS 2 SBM-3	Chap. 3.1.1.3 (SBM-3) Chap. 3.1.2.2 (SBM-3) Chap. 3.1.2.3 (SBM-3) Chap. 3.1.2.4 (SBM-3) Chap. 3.1.2.5 (SBM-3) Chap. 3.1.2.6 (SBM-3) Chap. 3.1.3.1 (SBM-3) Chap. 3.1.3.2 (SBM-3) Chap. 3.1.3.3 (SBM-3) Chap. 3.1.4.1 (SBM-3)
Engage in dialogue with affected stakeholders at all key stages of the due diligence process	ESRS 2 GOV-2	Chap. 3.1.1.2 (GOV-2)
	ESRS 2 SBM-2	Chap. 3.1.1.3 (SBM-2)
	ESRS 2 IRO-1	Chap. 3.1.1.4 (IRO-1)
	ESRS 2 MDR-P	Chap. 3.1.2.2 (E1-2, MDR-P) Chap. 3.1.2.3 (E2-1, MDR-P) Chap. 3.1.2.4 (E3-1, MDR-P) Chap. 3.1.2.5 (E4-2 MDR-P) Chap. 3.1.2.6 (E5-1, MDR-P) Chap. 3.1.3.1 (S1-1, MDR-P) Chap. 3.1.3.2 (S2-1, MDR-P) Chap. 3.1.3.3 (S3-1, MDR-P) Chap. 3.1.4.1 (G1-1, MDR-P)

<b>Core elements of due diligence</b>	<b>Points of the sustainability statement</b>	<b>Location</b>
Identifying and assessing negative impacts	ESRS 2 IRO-1	Chap. 3.1.1.4 (IRO-1)
	ESRS 2 SBM-3	Chap. 3.1.1.3 (SBM-3) Chap. 3.1.2.2 (SBM-3) Chap. 3.1.2.3 (SBM-3) Chap. 3.1.2.4 (SBM-3) Chap. 3.1.2.5 (SBM-3) Chap. 3.1.2.6 (SBM-3) Chap. 3.1.3.1 (SBM-3) Chap. 3.1.3.2 (SBM-3) Chap. 3.1.3.3 (SBM-3) Chap. 3.1.4.1 (SBM-3)
Take measures to respond to these negative impacts	ESRS 2 MDR-A	Chap. 3.1.2.2 (E1-3, MDR-A) Chap. 3.1.2.3 (E2-2, MDR-A) Chap. 3.1.2.4 (E3-2, MDR-A) Chap. 3.1.2.5 (E4-3, MDR-A) Chap. 3.1.2.6 (E5-2, MDR-A) Chap. 3.1.3.1 (S1-4, MDR-A) Chap. 3.1.3.2 (S2-4, MDR-A) Chap. 3.1.3.3 (S3-4, MDR-A) Chap. 3.1.4.1 (G1-5, MDR-A)
Tracking the effectiveness of these efforts and communicating	ESRS 2 MDR-M	Chap. 3.1.2.2 (E1-4, MDR-M) Chap. 3.1.2.2 (E1-6, MDR-M) Chap. 3.1.2.3 (E2-4, MDR-M) Chap. 3.1.2.4 (E3-4, MDR-M) Chap. 3.1.2.5 (E4-4, MDR-M) Chap. 3.1.2.5 (E4-5, MDR-M) Chap. 3.1.2.6 (E5-3, MDR-M) Chap. 3.1.2.6 (E5-4, MDR-M) Chap. 3.1.2.6 (E5-5, MDR-M) Chap. 3.1.3.1 (S1-5, MDR-M) Chap. 3.1.3.2 (S2-5, MDR-M) Chap. 3.1.3.3 (S3-5, MDR-M) Chap. 3.1.4.1 (G1-4, MDR-M) Chap. 3.1.4.1 (G1-5, MDR-M)
	ESRS 2 MDR-T	Chap. 3.1.2.2 (E1-4, MDR-T) Chap. 3.1.2.3 (E2-3, MDR-T) Chap. 3.1.2.4 (E3-3, MDR-T) Chap. 3.1.2.5 (E4-4, MDR-T) Chap. 3.1.2.6 (E5-3, MDR-T) Chap. 3.1.3.1 (S1-5, MDR-T) Chap. 3.1.3.2 (S2-5, MDR-T) Chap. 3.1.3.3 (S3-5, MDR-T)

### 3.1.5.1.5. Summary table of the world economic forum's stakeholder capitalism metrics

The following table presents the Secil Group's response to the WEF framework (core metrics), through the alignment between the metrics established by the WEF, the GRI metrics (which underpin the new framework), and the ESRS Standards.

Although some of these metrics do not have a direct correspondence with the GRI Standards, Secil addresses them indirectly through the content related to the respective topics presented throughout the sustainability statement.

Pillar	Theme	Metrics	Alignment to GRI	Alignment to ESRS
Governance	Purpose of Governance	Setting purpose	GRI 2-12	GOV-1 SBM-1
	Quality of the Governance Body	Governance body composition	GRI 2-9 GRI 405-1	GOV-1
	Stakeholder Engagement	Material issues impacting Stakeholders	GRI 2-12 GRI 2-29 GRI 3-2	SBM-2/3 IRO-1
	Ethical behaviour	Anti-corruption	GRI 205-2/3	G1-1 G1-3 G1-4
		Setting purpose	GRI 2-26	S1-3 S2-3 S3-3 S4-3 G1-1
	Risks and Opportunities	Integrating risk and opportunity into business process	No correspondence with GRI	SBM-3 IRO-1
Planet	Climate Change	Greenhouse Gas (GHG) Emissions	GRI 305-1/2/3	E1-6
		TCFD implementation	No correspondence with GRI	GOV-1/2/3 SBM-3 IRO-1 E1-1/2/3/4/6/9
	Loss of biodiversity	Land use and ecological sensitivity: Land use and ecological sensitivity focused on protected areas or with high biodiversity value	GRI 101-6	E4-5
	Availability of drinking water	Water consumption and withdrawal in water stressed areas	GRI 303-3/5	E3-4

Pillar	Theme	Metrics	Alignment to GRI	Alignment to ESRS
Pessoas	Dignity and equality	Diversity and inclusion: Percentage of employees per employee category, by age group, gender, and other indicators of diversity (e.g. ethnicity).	GRI 405-1 e 405-2	S1-9 S1-12 <sup>31</sup>
		Pay equality: Wage gap between men and women, ethnic minorities and majorities, and other relevant equality areas.		S1-16
		Wage level: Ratios of standard entry level wage by gender compared to local minimum wage.	GRI 202-1	S1-10
		Ratio of the annual total compensation of the CEO to the median of the annual total compensation of all its employees, except the CEO.	GRI 2-21	S1-16
		Risk of incidents of child labour forced or compulsory labour	GRI 408-1 e 409-1	SBM-3 S1-17
	Health and wellbeing	Health and safety: The number and rate of fatalities because of work-related injury; high-consequence work-related injuries (excluding fatalities); recordable work-related injuries; main types of work-related injury; and the number of hours worked.	GRI 403-9	S1-14
		An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided for employees and workers.	GRI 403-6	S1-4/S2-4 S1-11 <sup>32,33</sup>
		Skills for the future	Training (no.) hours of training per employee	GRI 404-1
	Training (€) investment in training per employee		No correspondenc e with GRI	No correspondenc e with ESRS <sup>34</sup>

<sup>31</sup> Not included in this report (not material)

<sup>32</sup> According to the material topics.

<sup>33</sup> Not included in this report (not material)

<sup>34</sup> Not included in this report

Pillar	Theme	Metrics	Alignment to GRI	Alignment to ESRS
Prosperity	Employment and wealth generation	Absolute number and rate of employment: Total number and rate of new employee hires during the reporting period, by age group, gender, other indicators of diversity and region and Total number and rate of employee turnover during the reporting period, by age group, gender, other indicators of diversity and region	GRI 401-1	S1-6
		Economic contribution: Direct economic value generated and distributed (EVG&D), on an accrual's basis, covering the basic components for the organization's global operations, ideally split out by: Revenues, Operating costs, Employee wages and benefits, Payments to providers of capital and Payments to government.	GRI 201-1	No correspondece with ESRS
	Financial assistance received from the government: total monetary value of financial assistance received by the organization from any government during the reporting period.	GRI 201-4	No correspondece with ESRS	
	Financial investment contribution: Total capital expenditures (CapEx) minus depreciation, supported by narrative to describe the company's investment strategy.	Sem GRI asociada	No correspondece with ESRS <sup>35</sup>	
	Share buybacks plus dividend payments, supported by narrative to describe the company's strategy for returns of capital to shareholders.	Sem GRI asociada	No correspondece with ESRS <sup>36</sup>	
	Innovation of better products and services	Total R&D expenses	Sem GRI asociada	No correspondece with ESRS
		Total costs related to research and development		
Community and social vitality	Total tax paid: The total overall tax borne by the company, including corporate income taxes, property taxes, non-creditable VAT and other sales taxes, employer-paid payroll taxes, and other taxes that constitute costs to the company, by category of taxes.	GRI 201-1, 207-4	No correspondece with ESRS	

<sup>35</sup> Not included in this report

<sup>36</sup> Noy included in this report

## 3.2. Additional sustainability disclosure

### 3.2.1. GRI CONTENT INDEX

<b>Statement of use:</b>	Secil Group has reported with reference to the GRI Standards for the period from January 1st to December 31st of 2025.
<b>GRI 1 used</b>	GRI 1: Fundaments 2021

General Disclosures	ESRS	Location
<b>GRI 2: GENERAL DISCLOSURES</b> With reference to the standard published in 2021		
<b>THE ORGANIZATION AND ITS REPORTING PRACTICES</b>		
2-1 Organizational details	-	Chap. 2.1 Identity
2-2 Entities included in the organization’s sustainability reporting	BP-1	Chap. 3.1.1.1 (BP-1)
2-3 Reporting period, frequency and contact point	-	Chap. 3.1.1.1 (BP-1)
2-4 Restatements of information	BP-2	Chap. 3.1.1.1 (BP-2)
2-5 External assurance	-	Chap. 3.1.1.1 (BP-1)
<b>ACTIVITIES AND WORKERS</b>		
2-6 Activities, value chain and other business relationships	SBM-1	Chap. 2.1 Identity Chap. 3.1.1.3 (SBM-1)
2-7 Employees	SBM-1 S1-6	Chap. 3.1.1.3 (SBM-1) Chap. 3.1.3.1 (S1-6)
2-8 Workers who are not employees	S1-7	Chap. 3.1.3.1 (S1-7)
<b>GOVERNANCE</b>		
2-9 Governance structure and composition	GOV-1	Chap. 3.1.1.2 (GOV-1)
2-10 Nomination and selection of the highest governance body	-	Chap. 3.1.1.2
2-11 Chair of the highest governance body	-	Chap. 3.1.1.2
2-12 Role of the highest governance body in overseeing the management of impacts	GOV-1 GOV-2 SBM-2	Chap. 3.1.1.2 (GOV-1) Chap. 3.1.1.2 (GOV-2) Chap. 3.1.1.3 (SBM-2)
2-13 Delegation of responsibility for managing impacts	GOV-1 GOV-2	Chap. 3.1.1.2 (GOV-1) Chap. 3.1.1.2 (GOV-2)
2-14 Role of the highest governance body in sustainability reporting	GOV-1 IRO-1	Chap. 3.1.1.2 (GOV-1) Chap. 3.1.1.4 (IRO-1)
2-16 Communication of critical concerns	GOV-2	Chap. 3.1.1.2 (GOV-2)
2-17 Collective knowledge of the highest governance body	GOV-1	Chap. 3.1.1.2 (GOV-1)
2-18 Evaluation of the performance of the highest governance body	-	Chap. 3.1.1.2
2-19 Remuneration policies	GOV-3	Chap. 3.1.1.2 (GOV-3)
2-20 Process to determine remuneration	GOV-3	Chap. 3.1.1.2 (GOV-3)
2-21 Annual total compensation ratio	S1-16	Chap. 3.1.3.1 (S1-16)
<b>STRATEGY, POLICIES AND PRACTICES</b>		

General Disclosures	ESRS	Location
2-22 Statement on sustainable development strategy	SBM-1	Chap. 3.1.1.3 (SBM-1)
2-23 Policy commitments	GOV-4	Chap. 3.1.1.2 (GOV-4) Chap.
	E1-2	3.1.2.2 (E1-2)
	E3-1	Chap. 3.1.2.4 (E3-1)
	E4-2	Chap. 3.1.2.5 (E4-2)
	E5-1	Chap. 3.1.2.6 (E5-1)
	S1-1	Chap. 3.1.3.1 (S1-1)
	S2-1	Chap. 3.1.3.2 (S2-1)
2-24 Embedding policy commitments	S3-1	Chap. 3.1.3.3 (S3-1)
	G1-1	Chap. 3.1.4.1 (G1-1)
	GOV-2	Chap. 3.1.1.2 (GOV-2)
	E1-3	Chap. 3.1.2.2 (E1-3)
	E3-2	Chap. 3.1.2.4 (E3-2)
	E4-3	Chap. 3.1.2.5 (E4-3)
	E5-2	Chap. 3.1.2.6 (E5-2)
2-25 Processes to remediate negative impacts	S1-4	Chap. 3.1.3.1 (S1-4)
	S2-4	Chap. 3.1.3.2 (S2-4)
	S3-4	Chap. 3.1.3.3 (S3-4)
2-26 Mechanisms for seeking advice and raising concerns	G1-1	Chap. 3.1.4.1 (G1-1)
	S1-3	Chap. 3.1.3.1 (S1-3)
	S2-3	Chap. 3.1.3.2 (S2-3)
2-27 Compliance with laws and regulations	S3-3	Chap. 3.1.3.3 (S3-3)
	S1-3	Chap. 3.1.3.1 (S1-3)
	S2-3	Chap. 3.1.3.2 (S2-3)
2-28 Membership associations	G1-1	Chap. 3.1.4.1 (G1-1)
	ESRS 2 SMB-3	Chap. 3.1.1.2
	ESRS E2	
	ESRS S1	
ESRS G1		
<b>STAKEHOLDER ENGAGEMENT</b>		
2-29 Approach to stakeholder engagement	G1-5	Chap. 3.1.4.1
	SBM-2	Chap. 3.1.1.3 (SBM-2)
	S1-2	Chap. 3.1.3.1 (S1-2)
	S2-2	Chap. 3.1.3.2 (S2-2)
2-30 Collective bargaining agreements	S3-2	Chap. 3.1.3.3 (S3-2)
	S1-8	Chap. 3.1.3.1 (S1-8)
<b>GRI 3: MATERIAL TOPICS</b> With reference to the standard published in 2021		
3-1 Process to determine material topics	IRO-1	Chap. 3.1.1.4 (IRO-1)
3-2 List of material topics	SBM-3	Chap. 3.1.1.3 (SBM-3)
	SBM-3	Chap. 3.1.1.3 (SBM-3)
	E1	Chap. 3.1.2.3 (SBM-3)
	E2	Chap. 3.1.2.2 (SBM-3)
	E4	Chap. 3.1.2.4 (SBM-3) Chap.
	E3	3.1.2.5 (SBM-3)
	E5	Chap. 3.1.2.6 (SBM-3)
	S1	Chap. 3.1.3.1 (SBM-3)
	S2	Chap. 3.1.3.2 (SBM-3)
	S3	Chap. 3.1.3.3 (SBM-3)
3-3 Management of material topics SBM	G1	Chap. 3.1.4.1 (SBM-3)

General Disclosures	ESRS	Location
<b>GRI 201: ECONOMIC PERFORMANCE</b> With reference to the standard published in 2016		
201-2 Financial implications and other risks and opportunities due to climate change	SBM-3 SBM-3 (E1)	Chap. 3.1.1.3 (SBM-3) Chap. 3.1.2.2 (SBM-3)

General Disclosures	ESRS	Location
<b>GRI 202: MARKET PRESENCE</b> With reference to the standard published in 2016		
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	S1-10	Chap. 3.1.3.1 (S1-10)
<b>GRI 205: ANTI-CORRUPTION</b> With reference to the standard published in 2016		
205-3 Confirmed incidents of corruption and actions taken	-	Chap. 3.1.3.1 (S1-17)
<b>GRI 206: ANTI-COMPETITIVE BEHAVIOUR</b>		
206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	-	Chap. 3.1.4.1 (G1) Chap. 4.2
<b>GRI 301: MATERIALS</b> With reference to the standard published in 2016		
301-1 Materials used by weight or volume	E5-4	Chap. 3.1.2.6. (E5-4)
301-2 Recycled input materials used	E5-4	Chap. 3.1.2.6. (E5-4)
<b>GRI 302: ENERGY</b> With reference to the standard published in 2016		
302-1 Energy consumption within the organization	E1-5	Chap. 3.1.2.2 (E1-5)
302-3 Energy intensity	E1-5	Chap. 3.1.2.2 (E1-5)
<b>GRI 303: WATER AND EFFLUENTS</b> With reference to the standard published in 2018		
303-1 Interactions with water as a shared resource	SBM-3 (E3) E3-1 E3-2 E3-3	Chap. 3.1.2.4 (SBM-3) Chap. 3.1.2.4 (E3-1) Chap. 3.1.2.4 (E3-2) Chap. 3.1.2.4 (E3-3)
303-2 Management of water discharge-related impacts	E2-3	Chap. 3.1.2.3 (E2-3)
303-3 Water withdrawal	E3-4	Chap. 3.1.2.4 (E3-4)
303-4 Water discharge	E3-4	Chap. 3.1.2.4 (E3-4)
303-5 Water consumption	E3-4	Chap. 3.1.2.4 (E3-4)
<b>GRI 301: BIODIVERSITY</b> With reference to standard published in 2024		
101-5 Sites with impacts on biodiversity	E4-5	Chap. 3.1.2.5 (E4-5)
<b>GRI 305: EMISSIONS</b> With reference to the standard published in 2016		
305-1 Direct (Scope 1) GHG emissions	E1-6	Chap. 3.1.2.2 (E1-6)
305-2 Energy indirect (Scope 2) GHG emissions	E1-6	Chap. 3.1.2.2 (E1-6)
305-4 GHG emissions intensity	E1-6	Chap. 3.1.2.2 (E1-6)
305-7 Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions	E2-4	Chap. 3.1.2.3 (E2-4)
<b>GRI 306: WASTE</b> With reference to the standard published in 2020		
306-1 Waste generation and significant waste-related impacts	SBM-3 (E5) E5-4	Chap. 3.1.2.6. (SBM-3) Chap. 3.1.2.6. (E5-4)
306-2 Management of significant waste-related impacts	E5-2 E5-5	Chap. 3.1.2.6. (E5-2) Chap. 3.1.2.6. (E5-5)
306-3 Waste generated	E5-5	Chap. 3.1.2.6. (E5-5)

General Disclosures	ESRS	Location
306-4 Waste diverted from disposal	E5-5	Chap. 3.1.2.6. (E5-5)
306-5 Waste directed to disposal	E5-5	Chap. 3.1.2.6. (E5-5)
<b>GRI 401: EMPLOYMENT</b> With reference to the standard published in 2016		
401-1 New employee hires and employee turnover	S1-6	Chap. 3.1.3.1 (S1-6)
401-3 Parental leave	S1-15	Chap. 3.1.3.1 (S1-15)
<b>GRI 403: OCCUPATIONAL HEALTH AND SAFETY</b> With reference to the standard published in 2018		
403-1 Occupational health and safety management system	S1-1	Chap. 3.1.3.1 (S1-1)
403-2 Hazard identification, risk assessment, and incident investigation	S1-3	Chap. 3.1.3.1 (S1-3)
403-3 Occupational health services	S1-4	Chap. 3.1.3.1 (S1-4)
403-4 Worker participation, consultation, and communication on occupational health and safety	S1-2	Chap. 3.1.3.1 (S1-2)
403-5 Worker training on occupational health and safety	S1-4	Chap. 3.1.3.1 (S1-4)
403-6 Promotion of worker health	S1-4	Chap. 3.1.3.1 (S1-4)
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	S2-4	Chap. 3.1.3.2 (S2-4)
403-8 Workers covered by an occupational health and safety management system	S1-14	Chap. 3.1.3.1 (S1-14)
403-9 Work-related injuries	S1-14	Chap. 3.1.3.1 (S1-14)
403-10 Work-related ill health	S1-14	Chap. 3.1.3.1 (S1-14)
<b>GRI 404: TRAINING AND EDUCATION</b> With reference to the standard published in 2016		
404-1 Average hours of training per year per employee	S1-13	Chap. 3.1.3.1 (S1-13)
404-2 Programs for upgrading employee skills and transition assistance programs	S1-1 S1-5	Chap. 3.1.3.1 (S1-1) Chap. 3.1.3.1 (S1-5)
404-3 Percentage of employees receiving regular performance and career development reviews	S1-13	Chap. 3.1.3.1 (S1-13)
<b>GRI 405: DIVERSITY AND EQUAL OPPORTUNITY</b> With reference to the standard published in 2016		
405-1 Diversity of governance bodies and employees	GOV-1 S1-6 S1-9	Chap. 3.1.1.2 (GOV-1) Chap. 3.1.3.1 (S1-6) Chap. 3.1.3.1 (S1-9)
405-2 Ratio of basic salary and remuneration of women to men	S1-16	Chap. 3.1.3.1 (S1-16)
<b>GRI 406: NON-DISCRIMINATION</b> With reference to the standard published in 2016		
406-1 Incidents of discrimination and corrective actions taken	S1-17	Chap. 3.1.3.1 (S1-17)
<b>GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</b> With reference to the standard published in 2016		
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	S1-1/8 S2-1	Chap. 3.1.3.1 (S1-1/8) Chap. 3.1.3.2. (S2-1)
<b>GRI 408: CHILD LABOUR</b> With reference to the standard published in 2016		
408-1 Operations and suppliers at significant risk for incidents of child labour	S1-1	Chap. 3.1.3.1 (S1-1)
<b>GRI 409: FORCED OR COMPULSORY LABOUR</b> With reference to the standard published in 2016		



General Disclosures	ESRS	Location
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	S1-1 S2-1	Chap. 3.1.3.1 (S1-1) Chap. 3.1.3.2 (S2-1)
<b>GRI 410: SECURITY PRACTICES</b> With reference to the standard published in 2016		
410-1 Security personnel trained in human rights policies or procedures	S3	Chap. 3.1.3.3 (S3-1)
<b>GRI 415: PUBLIC POLICY</b> With reference to the standard published in 2016		
415-1 Political contributions	ESRS G1-5	Chap. 3.1.4.1 (G1-5)

### 3.2.2. GCCA Table

Pillar	KPI	Unit	2023	2024	2025	
<b>H&amp;S</b>	No. of fatal employee accidents	No.	1	–	0	
	No. of fatal accidents for third party workers (contractors and subcontractors)	No.	1	–	0	
	No. of fatal off-site accidents	No.	0	0	0	
	No. of accidents with lost working days	No.	32	39	33	
	Lost-time accident frequency rate, per 1,000,000 hours worked, for employees	-	6.6	8	6.0	
	No. of accidents with lost working days for third party workers (contractors and subcontractors)	No.	19	23	25	
	Lost-time accident frequency rate, per 1,000,000 hours worked, for third party workers (contractors and sub-contracts)	-	5.1	5.5	6.8	
	Total number of accidents (employees, contractors and subcontractors)	No.	51	62	58	
	Number of lost working days for employees	No.	975	1 495	1 317	
	Severity rate for employees, per 1,000,000 hours worked - per days worked	-	200.8	203.4	159.1	
	<b>CO2</b>	Total direct CO2 emissions - gross	Mt CO2	3.23	3.25	3.59
		Total direct CO2 emissions - net	Mt CO2	3.05	3.05	3.38
Specific CO2 emissions - gross		kg CO2 / t cementitious product	671	655	656	
Specific CO2 emissions - net		kg CO2 / t cementitious product	632	614	617	
<b>Coprocessing</b>	Alternative fuel rate - alternative fossil fuels and biomass	%	0.21	25	0.254	
	Biomass fuel rate	%	0.053	8.6	0.091	
	Kiln energy efficiency	MJ/t clinker	3 738	3 667	3 607	
	Alternative raw materials (clinker and cement)	%	0.115	12.3	0.177	
	Clinker amount in cement	%	79	79.1	79.8	

Pillar	KPI	Unit	2023	2024	2025
Other emissions	Coverage rate - general	%	0.72	74	1
	Coverage rate - continuous measurement	%	0.72	81	0.66
	PM - Total emissions	t/year	38	32	73
	PM - Specific emissions	g/t clinker	13	11	17
	PM - Coverage rate	%	0.78	80	1
	NOx - Total emissions	t/year	2 790	3 604	4 101.000
	NOx - Specific emissions	g/t clinker	1 043	1 161	975.000
	NOx - Coverage rate	%	0.71	81	1
	SO2 - Total emissions	t/year	1 045	1 335	1 448.000
	SO2 - Specific emissions	g/t clinker	356	430	344
	SO2 - Coverage rate	%	0.78	81	1
	VOC/THC - Total emissions	t/year	140	70	117
	VOC/THC - Specific emissions	g/t clinker	52	25	32
	VOC/THC - Coverage rate	%	0.71	74	0.88
	Hg - Total emissions	kg/year	75	21	20
	Hg - Specific emissions	mg/t clinker	28	7	7
	Hg - Coverage rate	%	0.72	74	0.66
	HM1* - Total emissions	kg/year	19	21	25
	HM1* - Specific emissions	mg/t clinker	7	8	9
	HM1* - Coverage rate	%	0.72	74	0.66
	HM2** - Total emissions	kg/year	2 417	834	908
	HM2** - Specific emissions	mg/t clinker	892	293	328
	HM2** - Coverage rate	%	0.72	74	0.66
PCDD/F - Total emissions	mg/year	35	23	54	
PCDD/F - Specific emissions	mg/t clinker	13	8	19	
PCDD/F - Coverage rate	%	0.72	74	0.66	
Biodiversity	quarries with high ecological value with biodiversity management plans ***	%	33	75	88
	quarries with implemented rehabilitation plans ***	%	0.83	93	0.93
Water	Water consumption = Water withdrawal - total water discharged to receiving bodies	m3/year	1 394 076	1 193 786	1 195 734
	Amount of water consumption per product unit	l/t cimentitious product	290	240	218

\* HM1 (sum of Cd, Tl)

\*\* HM2 (sum of Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V)

\*\*\* Active quarries

Note: The data for 2023 and 2024 have been audited. The 2025 data are pending audit



### 3.2.3. Sustainability-Linked Financing

In 2025, Secil achieved a significant milestone in its sustainable financing strategy. Starting from a baseline of zero percent in 2022, and with the target of reaching 50% sustainable financing lines by 2025, the company exceeded this goal one year ahead of schedule. By the end of 2025, 74% of contracted financing lines were sustainable, reflecting Secil's commitment to integrating ESG factors into financial management and aligning with responsible practices that contribute to a more sustainable transition.

The information presented in this chapter was published separately on Secil's website and was subject to independent verification, with the issuance of a limited assurance report [dated 30 April 2025](#).

#### Sustainability-Linked Financing Progress Report 2025

Secil is deeply engaged in developing its activity by applying Environmental, Social and Governance (ESG) principles and best practices and has established its Sustainability-Linked Financing Framework (SLFF) to support the general finance and/or refinance of its activity through the emission of Loans or Bonds linked to sustainability.

In 2023, Secil published its SLFF ([Sustainability-Linked Financing | Secil Group](#)) with the purpose of associating the Key Performance Indicators (KPI) defined for new financing or restructuring existing financing by linking them to these same KPI's. KPI's were established for three of the geographies where Secil operates (Portugal, Brazil and Tunisia), one in the environmental field and the other in the social sphere.

In order to provide investors and lenders with adequate information about the progress made on the KPI's and the achievement or not of the Sustainability Performance Targets (SPT) set out in the SLFF and in the legal documentation of the Sustainability-Linked Financing Instruments and any impact on the Sustainability-Linked Financing pricing, Secil committed to report at least annually, on the following:

- Up-to-date information on the performance of the selected KPI, as per the relevant reporting period and when applicable, as per the Target Observation Date including the calculation methodology and baselines where relevant.
- Any relevant information enabling investors/lenders to monitor the ambition of the SPT's including any update in Secil's sustainability strategy and/or on the related KPI/ESG governance, and more generally any information relevant to the analysis of the KPI's and SPT's.
- When relevant, any re-assessments of KPI's and/or restatement of the SPT's and/or pro-forma adjustments of KPI's.

Secil has committed, through its SLFF, to have this progress reported in its Annual Report, in a specific publication regarding the SPTs or in its annual sustainability reporting that should be kept readily available and easily accessible on the Company's website at [www.secil-group.com](http://www.secil-group.com).

There was no need for recalculation of KPI's baseline and/or SPT's, since no Recalculation Event nor update of SPT's following validation of targets by SBTi has occurred.



According to the SLFF, December 2025 stands as the first Observation Date for the Environmental KPI's and the second for the Social KPI's. Therefore, the table below shows the KPI's, baseline, target and values observed as of December 31, 2025:

Country	KPI	Target 2025	2025
Portugal	CO2 emissions (kg CO2/tonne cement) - scope 1&2	535	590
	Lost Time Injury Frequency Rate (cement)	4.5	5.3
Brazil	CO2 emissions (kg CO2/tonne cement) - scope 1&2	633	643
	% Total Women in Total End Year Headcount	18.9 %	16.2 %
Tunisia	CO2 emissions (kg CO2/tonne cement) - scope 1&2	785	816
	% Total Women in Total End Year Headcount	8.8 %	8.5 %

Figure 1 – KPI's observed as of December 31, 2025

## Calculation Methodology and Performance

### 1) Portugal

#### - KPI #1: CO2 emissions (kg CO2/tonne cement) - scope 1&2

The CO2 emissions are calculated according to the GCCA Cement CO<sub>2</sub> and Energy Protocol.

The GCCA Cement CO<sub>2</sub> and Energy Protocol is a standardised accounting and reporting methodology developed for the global cement industry to measure, calculate and report carbon dioxide (CO<sub>2</sub>) emissions and energy use from cement production.

The protocol comprises three main elements such as a Guidance document, an Excel spreadsheet and an Internet Manual for more detailed explanations and FAQs on the spreadsheet and guidance.

In 2025, Portugal achieved 590 kg CO<sub>2</sub> per tonne of cement. The 2025 target focused on reducing Scope 1 emissions, primarily through the Clean Cement Line (CCL) Project – the upgrade of Kiln 9 at the Outão Plant. This project was supported by four R&D subprojects aimed at eliminating dependence on fossil fuels, improving energy efficiency, generating electricity in-house, integrating digitalization into processes, and reducing CO<sub>2</sub> emissions.

The variance from the 2025 CO<sub>2</sub> emissions target was mainly driven by the performance of the subprojects, particularly the quality of alternative fuels and the kiln design. The Plant is conducting studies to address these challenges and achieve the target substitution rate of 80%. The Low Carbon Clinker subproject reached 6.3% in 2025, and the Plant is working to increase this figure and reach 15%. Efforts also continue to stabilize kiln operations and reduce specific heat consumption.

Looking ahead, the Company expects continued emissions reductions in line with its decarbonization roadmap, supported by the upgrade of the Maceira Plant – Profuture Project - and ongoing improvements in the performance of the CCL Project at Outão Plant.

#### - KPI #2: Lost Time Injury Frequency Rate (LTIFR)

$$\frac{\text{No. of accidents with sick leave}}{\text{No. of hours worked}} \times 1\,000\,000$$

The KPI refers to direct and indirect employees of the cement business (cement and bags plants, commercial, headquarters, storage facilities), and the value 1,000,000 used in the calculation is a normalization factor of the number of hours worked, being used as an indicator by the ILO, International Labour Organization.

In 2025, Secil's cement plants in Portugal continued their positive trajectory in safety performance, recording a Lost Time Injury Frequency Rate (FR) of 5.3. Although above the defined target of 4.5, this result demonstrates the organization's ongoing efforts and strong commitment to Occupational Health and Safety (OHS), within a context of strengthened leadership practices, risk prevention, and consolidation of a strong safety culture.

Throughout 2025, Secil maintained the Safety Framework as a key strategic initiative to sustain and strengthen a positive safety culture, while simultaneously promoting continuous improvement in reducing Lost Time Injuries (LTIs). The Secil Safety Framework is a structured OHS management system designed to address the organization's specific industrial safety needs. It comprises 37 elements organized into three main pillars - People, Operational Excellence, and Management Excellence - further divided into five sub-pillars: Leadership, Training, Operational Safety, Key Issue Management Systems, and Communication & Reporting. Together, these components support the systematic integration of OHS best practices across Secil's operations.

Within the Leadership and Training sub-pillars, 2025 was marked by the implementation of structured initiatives with a direct impact on strengthening the safety culture. Notably, the VOL Program - Visible Operational Leadership was implemented as a safety leadership training program based on the principle of "messages from leaders to leaders", aiming to reinforce the active role of leadership in promoting safe behaviors and accident prevention. In addition, the BOG - Boots On the Ground program encouraged a more consistent and effective leadership presence in the field, enhancing proximity to operational teams, direct observation of working conditions, and early identification of risks. In parallel, the systematic delivery of Safety Talks ensured a consistent, daily focus on safety topics, contributing to the continuous strengthening of employee safety awareness.

The Operational Safety and Key Issue Management Systems sub-pillars ensure the existence of robust procedures for managing high-risk activities, including requirements related to equipment and structures, personal protective equipment (PPE), confined space work, and legal compliance. In 2025, the LOTOTO (Lock Out, Tag Out, Try Out) procedure was reinforced, which is essential for controlling hazardous energies during maintenance and production activities, alongside a strengthened focus on the safety of structures and equipment. In addition, the recognition and disciplinary policy was consolidated, promoting individual and collective accountability and consistent compliance with safety requirements. These procedures are supported by robust documentation and regular audits, ensuring consistency, operational discipline, and accountability.

Finally, the Communication & Reporting sub-pillar promotes open and transparent dialogue on safety through regular communications, sharing of performance indicators, safety alerts, and dissemination of lessons learned from incidents, contributing decisively to the continuous improvement of OHS performance.

SECIL SAFETY FRAMEWORK					
People		Operational Excellence		Management Excellence	
Leadership	Training	Operational Safety & Key Issue		Management Systems	Communication & Reporting
Safety Leadership Programmes	Technical Safety Training (Include Key Issues Training Contractor's training Driver's training)	Internal Circulation Plan	Works at Height	Legal Requirements Compliance	Safety Moments
Safety Talks		Safety Signs	LOTOTO	Non-Legal Requirements Compliance (includes associative requirements)	Lagging & Leading Indicators
Safety Walks	Behavioral Safety Training (Include Safety Ambassadors)	PPE	Confined Spaces Entry	Norms, Procedures & Documentation	Incidents Alerts & Lessons Learned
Boots on Ground	Risk Perception	Risk assessment	Hot Works	Audits	Good Learnings
		Safety Observations (Near misses + unsafe situations)	Work Equipment Inspection	Consequence Management	Thematic Campaigns
		ELOS	Lifting Operations		Conversation Circles
		STOP/GO Card	Preheaters		
		PRA Preliminary Risk Analysis	Contractors Rules & Initiatives		
		Psychosocial Risk Assessment	Driver Rules & Initiatives		
			Emergency Management		

Secil remains firmly committed to continuous safety improvement, learning from the past through the systematic application of lessons learned, actively addressing present challenges through targeted initiatives, and strategically preparing for the future. This long-term, forward-looking approach is reflected in the implementation of prevention plans and structured actions, in line with the Safety Roadmap 2026–2030, with the clear ambition of achieving progressively lower Lost Time Injury levels across all its operations.

## 2) Brazil

### – KPI #1: CO<sub>2</sub> emissions (kg CO<sub>2</sub>/tonne cement) - scope 1&2

The CO<sub>2</sub> emissions are calculated according to the GCCA Cement CO<sub>2</sub> and Energy Protocol.

The GCCA Cement CO<sub>2</sub> and Energy Protocol is a standardised accounting and reporting methodology developed for the global cement industry to measure, calculate and report carbon dioxide (CO<sub>2</sub>) emissions and energy use from cement production.

The protocol comprises three main elements such as a Guidance document, an Excel spreadsheet and an Internet Manual for more detailed explanations and FAQs on the spreadsheet and guidance.

In 2025, Brazil reached 643 kg CO<sub>2</sub> per tonne of cement. The variance versus the 2025 CO<sub>2</sub> emissions target was mainly driven by performance in the clinker production process. The thermal substitution rate reached 30.6%, below the planned 40%, while kiln thermal energy intensity was slightly above forecast.

Challenges included the limited availability of alternative fuels – including biomass – that met required specifications, as well as kiln instabilities throughout the year, which reduced co-processing capacity.

In contrast, cement production delivered positive results, with clinker content maintained below budgeted levels through increased use of alternative materials, contributing to emissions mitigation.

Looking ahead, the Company expects continued emissions reductions, supported by the expansion of biomass in the energy mix, in line with its decarbonisation roadmap.

### – KPI # 2: % total women in Total End Year Headcount

Number of women in total end year headcount (excluding trainees).

In 2025, Brazil reached 16.2% against the target of 18.9%. The year started with 84 women in the workforce (15.2%). Through actions implemented across the Attraction, Retention and Inclusion pillars, the number of women increased to 92 by year-end, representing a net increase of 1 percentage point.

Despite this positive evolution, the SPT was not fully achieved, reflecting workforce dynamics throughout the year, including higher-than-expected turnover impacting female employees. Nevertheless, Diversity, Equity and Inclusion (DEI) remain a material and strategic priority within the Group's ESG framework.

A structured roadmap remains in place across the Attraction, Retention and Inclusion pillars. In 2026, actions under the roadmap will continue to be implemented, with employer branding initiatives aimed at strengthening female attraction.

### 3) Tunisia

#### – KPI #1: CO<sub>2</sub> emissions (kg CO<sub>2</sub>/tonne cement) - scope 1&2

The CO<sub>2</sub> emissions are calculated according to the GCCA Cement CO<sub>2</sub> and Energy Protocol.

The GCCA Cement CO<sub>2</sub> and Energy Protocol is a standardised accounting and reporting methodology developed for the global cement industry to measure, calculate and report carbon dioxide (CO<sub>2</sub>) emissions and energy use from cement production.

The protocol comprises three main elements such as a Guidance document, an Excel spreadsheet and an Internet Manual for more detailed explanations and FAQs on the spreadsheet and guidance.

In 2025, Tunisia reached 816 kg CO<sub>2</sub> per tonne of cement. The 2025 target focused on reducing Scope 2 emissions through the use of solar power generated under a Power Purchase Agreement (PPA) with an external provider. However, the PPA project did not commence in 2025 as planned. Execution began at the end of 2025 and is expected to be completed by the end of 2026, with Scope 2 emissions savings starting thereafter.

Looking ahead, the Company expects continued emissions reductions, also supported by the increased use of alternative fuels, particularly biomass, in line with its decarbonisation roadmap.

#### – KPI # 2: % total women in Total End Year Headcount

Number of women in total end year headcount (excluding trainees).

In 2025, Tunisia reached 8.5% against the target of 8.83%. During the year, workforce composition was impacted by regulatory changes that led to the integration of a significant number of workers with historically low female representation. As a result, despite recruitment actions undertaken, the overall percentage of women in the workforce decreased. This variation reflects a change in workforce scope rather than a shift in recruitment or diversity policies, and the level is expected to remain stable in 2026.

**Carlos Manuel Guimarães Correia de Barros**

CHIEF FINANCIAL OFFICE (CFO)

**Otmar Hubscher**

CHIEF EXECUTIVE DIRECTOR (CEO)

### 3.2.4. Sustainability awards and recognitions in 2025

Some of the recognitions and awards received for sustainability performance by the different geographies of Secil in 2025 are highlighted below.

#### Portugal

##### Gold Certification CSC – Concrete Sustainability Council | Secil Maceira e Outão

The CSC – Concrete Sustainability Council Certification is an international certification system focused on the sustainability of materials such as cement, assessing the environmental, social, economic and management performance of products, from the extraction of raw materials through to the final product.

The main objective of this certification is to ensure that manufacturers adopt sustainable practices throughout the entire value chain, promoting the reduction of environmental impacts, energy efficiency, proper waste management, and respect for social and labour rights.

It should be noted that the certification includes four distinction levels: Bronze, Silver, Gold and Platinum.

Secil was awarded the Gold level certification, valid for three years. The Maceira and Outão plants both achieved the Gold level, a result that reflects the commitment and dedication of everyone involved.

The Secil-Outão plant has been certified since 2022, having initially achieved the Bronze level.

This certification further reinforces Secil’s commitment to sustainability and the continuous improvement of its processes.





### Prémio Caixa ESG (Caixa ESG Award) – Caixa Geral de Depósitos | Secil Aggregates

Secil Aggregates, in Portugal, received the Caixa ESG Award, granted by Caixa Geral de Depósitos.

This award recognises companies that incorporate and tailor strong environmental, social and governance indicators into their management practices, thereby demonstrating a high level of commitment to the Sustainable Development Goals. It also distinguishes companies that stand out for integrating ESG best practices into the management of their economic activity sector in Portugal.



### Brazil

#### ACP<sup>37</sup> Sustainability Award | Supremo Secil Cimentos

Supremo Secil Cimentos, in Brazil, was recognised for its sustainable practices by achieving 3rd place in the 2025 ACP Sustainability Award, in the category “Combating Climate Change”, reinforcing the company’s commitment to mitigating environmental impacts and to operating in alignment with SDG 13 – Climate Action.



<sup>37</sup> ACP - Associação Comercial do Paraná (Commercial Association of Paraná)

**Be Human Award (Prêmio Ser Humano) ABRH-PR<sup>38</sup> – ESG & Sesi<sup>39</sup> Award SDG - Pedro Queiroz Pereira Cultural Centre (Casa da Cultura Pedro Queiroz Pereira) | Adrianópolis**

The Pedro Queiroz Pereira Cultural Centre received two awards in 2025: the Ser Humano ABRH-PR – ESG Award, granted to initiatives that generate social impact and strengthen responsible business practices, and the Sesi SDG Award 2025, which recognises projects aligned with the Sustainable Development Goals (SDGs).

The Pedro Queiroz Pereira Cultural Centre promotes free educational, cultural, sports, recreational and leisure activities through voluntary work, strengthening ties with the community and contributing to social development, aligned with SDGs 3, 4, 10, 11 and 17..



<sup>38</sup> ABRH-PR - Associação Brasileira de Recursos Humanos do Paraná (Brazilian Human Resources Association of Paraná)  
<sup>39</sup> Serviço Social da Indústria (Social Service of the Industry)



## Lebanon

### Awarded for Excellence in Training | Secil Sibline

Secil Sibline, in Lebanon, was awarded by the Association of Lebanese Industrialists (ALI), in collaboration with GIZ (German Cooperation), for excellence in the quality of training provided to employees. This recognition is the result of the work carried out within the Social pillar, particularly in the area of employee training and development.

## Tunisia

### Recognition for Community Development - Gabès Hospital | Secil Sibline

Secil Tunisia was recognised for its commitment to community development, namely through the renovation of the paediatric department of Gabès Hospital. This recognition was granted by several entities: the Governor of Gabès, the Director of the Regional Hospital of Gabès, representatives of local civil society and national media outlets. This recognition is the result of the work carried out within the Social pillar, particularly in the area of community investment.





### 3.3. Limited assurance report



#### INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON SUSTAINABILITY REPORTING

*(Free translation from a report originally issued in Portuguese language. In case of doubt, the Portuguese version will always prevail.)*

To the Board of Directors of  
**Secil - Companhia Geral de Cal e Cimento, S.A.**

##### Limited assurance conclusion

We performed a limited assurance engagement on the Consolidated Sustainability Report of Secil - Companhia Geral de Cal e Cimento, S.A. ("Group") included in the "Sustainability Statement – Non-Financial Statement" section of the Annual Report (the "Consolidated Sustainability Report") as at 31 December 2025 and for the period from 1 January to 31 December 2025.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Group's Consolidated Sustainability Report as at 31 December 2025 and for the period from 1 January to 31 December 2025 has not been prepared, in all material respects, in accordance with:

- the European Sustainability Reporting Standards (ESRS), including that the process performed by the Group to identify the information reported in the Sustainability Report (the "Process") is in accordance with the description made in chapter 3.1.1.4 – Management of Impacts, Risks, and Opportunities (IRO); and,
- the disclosures provided for in Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation"), included in chapter 3.1.2.1 – European Taxonomy.

##### Basis for the conclusion

Our work was carried out in accordance with the International Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information – ISAE 3000 (Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the other standards and technical guidelines of the Portuguese Institute of Statutory Auditors.

The procedures performed in a limited assurance engagement vary in nature and timing and are more limited in scope than those in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those standards are further described in the "Our responsibilities" section below.

We consider that the audit evidence obtained is sufficient and appropriate to provide a basis for our opinion.

##### Quality and Independence

We have applied the International Standard on Quality Management ISQM 1, Quality Management for Firms that Perform Audits and Reviews of Financial Statements and Other Assurance and Related Services, issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management including policies or



procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We comply with the independence and other ethical requirements set out in the International Code of Ethics for Professional Accountants (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA) and the *Ordem dos Revisores Oficiais de Contas* (OROC) code of ethics.

### **Responsibilities of Management and the Supervisory Body for the Sustainability Report**

It is the responsibility of Management to design, implement and maintain a process for identifying the information to be presented in the Consolidated Sustainability Report, in accordance with the ESRS, and to disclose this process in chapter 3.1.1.4 – Management of Impacts, Risks, and Opportunities (IRO) of the Consolidated Sustainability Report. This responsibility includes:

- understanding the context in which the Group's business activities and relationships take place and how stakeholders may be affected;
- identifying actual and potential impacts (both negative and positive) related to sustainability issues, as well as the risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term;
- an assessment of the materiality of the identified impacts, risks and opportunities related to sustainability issues, through the selection and application of appropriate thresholds; and
- the selection and application of methodologies and the definition of assumptions that are reasonable in the circumstances.

The Management Body is also responsible for:

- preparing the Consolidated Sustainability Report in accordance with the ESRS;
- preparing the disclosures in chapter 3.1.2.1 – European Taxonomy of the Consolidated Sustainability Report in accordance with Article 8 of the Taxonomy Regulation;
- design, implementation and maintenance of an appropriate information and internal control system to enable a preparation of the Consolidated Sustainability Report that is free from material misstatement, whether due to errors or fraud; and,
- selecting and applying appropriate methods for the preparation of the Consolidated Sustainability Report and defining assumptions and estimates regarding sustainability disclosures that are reasonable in the circumstances.



### Limitations inherent in the preparation of the Consolidated Sustainability Report

When reporting prospective information in accordance with the ESRS, the Management Body is required to prepare such information based on disclosed assumptions regarding events that may occur in the future and the Group's possible future actions. Future events often do not occur as anticipated, so actual results are likely to differ from those forecast.

In determining the disclosures in the Consolidated Sustainability Report, the Management makes certain interpretations of legislation or other undefined matters. Such legislation or other undefined matters may be interpreted differently, including the legal compliance of such interpretations, and are therefore subject to uncertainty.

### Auditors' Responsibilities

Our objectives are to plan and perform limited assurance work to determine whether the Consolidated Sustainability Report is free from material misstatement, whether due to fraud or error, and to report our limited assurance conclusion to the Management. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Sustainability Report as a whole.

As part of a limited assurance engagement conducted in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional scepticism throughout the engagement.

Our responsibilities in relation to the Consolidated Sustainability Report, with regard to the Process, include:

- Obtaining an understanding of the Process, but not for the purpose of expressing a conclusion on the effectiveness of the Process, including its outcome; and
- Design and execute procedures to assess whether the Process is consistent with the Group's description of it, as disclosed in chapter 3.1.1.4 – Management of Impacts, Risks, and Opportunities (IRO).

Our further responsibilities in relation to the Consolidated Sustainability Report include:

- Obtaining an understanding of the control environment, processes and information systems relevant to the Consolidated Sustainability Report, but not to the extent of evaluating the design of specific control activities, obtaining evidence of their implementation or testing their operational effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error; and
- Designing and performing procedures directed at disclosures in the Consolidated Sustainability Report where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control.



### Summary of the work carried out to support our opinion

A limited assurance engagement involves performing procedures to obtain evidence regarding the Consolidated Sustainability Report.

We designed and carried out our procedures to provide a basis for our opinion. The nature, timing and scope of our procedures depend on our understanding of the Consolidated Sustainability Report and other circumstances surrounding the engagement, including the identification of disclosures where material misstatements, whether due to fraud or error, may occur in the Consolidated Sustainability Report.

In carrying out our limited assurance engagement in relation to the Process:

- We obtained an understanding of the Process by:
  - i. Conducting interviews with relevant managers and staff, at corporate and operational levels, regarding the sustainability strategy and policies for materially relevant aspects, and the implementation of these across the various business areas; and
  - ii. Analysing internal documentation produced by the Group regarding the Process; and
- We assessed whether the evidence obtained based on our procedures on the Process was consistent with the description of the Process, disclosed in chapter 3.1.1.4 – Management of Impacts, Risks, and Opportunities (IRO).

In carrying out our limited assurance engagement in relation to the Consolidated Sustainability Report:

- We obtained an understanding of the Group's reporting processes relevant to the preparation of the Sustainability Report by reviewing the Group's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Report, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- We have assessed whether the material information identified by the Process is included in the Consolidated Sustainability Report;
- We have assessed whether the structure and presentation of the Consolidated Sustainability Report comply with the ESRS;
- We carried out interviews with relevant staff and performed analytical procedures on selected disclosures in the Consolidated Sustainability Report;
- We carried out substantive procedures, on a sample basis, on selected disclosures in the Consolidated Sustainability Report;
- We obtained evidence regarding the methods, assumptions and data used in the preparation of material estimates and prospective information, and regarding how those methods were applied;
- We have obtained an understanding of the process for identifying eligible economic activities that are aligned with the taxonomy, and the corresponding disclosures in the Consolidated Sustainability Report.

29 May 2026

SIGNED ON THE ORIGINAL

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**KPMG & Associados -  
Sociedade de Revisores Oficiais de Contas, S.A.  
(ROC no. 189 and registered at CMVM with no. 20161489)**  
Represented by  
Pedro Jorge Quental e Cruz  
(ROC no. 1765 and registered at CMVM with no. 20161607)