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INDEPENDENT LIMITED ASSURANCE REPORT

To the Board of Directors of
Secil – Companhia Geral de Cal e Cimento, S.A.
Av. Eng. Duarte Pacheco, No. 19, 7th Floor
1070-100 Lisbon
Portugal

9 December 2025

Introduction

We were engaged by the Board of Directors of **Secil – Companhia Geral de Cal e Cimento, S.A.** (hereafter “**Secil**” or “Entity”) to perform a limited assurance engagement regarding **Secil**’s Green Finance Framework (the “Framework”) alignment in accordance with the four core components of the Green Bond Principles issued by the International Capital Market Association (“ICMA”) in June 2025 (“GBP”) and the four core components of the Green Loan Principles issued by the Loan Market Association (“LMA”) in March 2025 (“GLP”).

Management’s responsibilities

The Management is responsible for the:

- Preparation and presentation of the Green Finance Framework and its stated policies and procedures in accordance with the four core components of the GBP and the GLP (Use of Proceeds, Process for Project Evaluation and Selection, Management of Proceeds, and Reporting);
- Design, implementation and maintenance of an appropriate information and internal control system to enable the preparation of the Green Finance Framework in accordance with the four core components of the GBP and of the GLP that is free from material misstatement, whether due to errors or fraud;
- Prevention and detection of fraud and errors and for identifying and ensuring that the Entity complies with laws and regulations applicable to its activities; and,
- Process to ensure that the Management and staff involved with the preparation and presentation of the Green Finance Framework have the appropriate skills.

Our responsibilities

Our responsibility is to perform a limited assurance work and to report thereon in the form of an independent limited assurance conclusion based on the evidence obtained.

We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* 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 Ordem dos Revisores Oficiais de Contas, which require that we plan and perform our work to obtain limited assurance as to whether nothing has come to our attention that causes us to believe that the Entity's Green Finance Framework has not been prepared, in all material respects, in accordance with the four core components of the Green Bond Principles issued by the International Capital Market Association in June 2025 and with the four core components of the Green Loan Principles issued by the Loan Market Association in March 2025. For this purpose, this work included, among other procedures, the following:

- Interviews with management and key staff responsible for the Green Finance Framework to obtain an understanding of the processes, systems and controls in place in respect of the Use of Proceeds, Process for Project Evaluation and Selection, Management of Proceeds and Reporting;
- Revision of the Green Finance Framework and comparison of its four core components with the requirements of GBP and of the GLP; and
- Inspection of documentation which supports Management's assertion about conformance to the four core components of the GBP and of the GLP requirements for the Use of Proceeds, Process for Project Evaluation and Selection, Management of Proceeds and Reporting.

The procedures selected depend on our understanding of the compliance with the Green Finance Framework and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise.

The procedures performed in a limited assurance engagement are different in nature and timing and are less in extent than for 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.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

A summary of our assurance procedures (Appendix I) and our key findings and observations regarding each core component of the GBP (Appendix II) and the GLP (Appendix III) may be found as appendices of this report.

Quality and independence

The firm applied the International Standard on Quality Management 1 which 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 have complied with the independence and other ethical requirements in the Ordem dos Revisores Oficiais de Contas' code of ethics and the International Code of Ethics for Professional Accountants (including international independence standards) (IESBA Code), which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Inherent Limitations

Our work was conducted to obtain a limited assurance over the compliance of **Secil**'s Green Finance Framework with the GBP and the GLP. Therefore, we do not express a conclusion over the compliance of any future bonds or loans issued under this Framework. Consequently, readers are cautioned that this report may not be appropriate for purposes other than those described above.



Conclusion

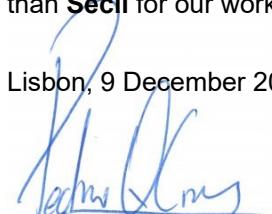
Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Green Finance Framework prepared by **Secil** has not been prepared, in all material respects, in accordance with the four core components of the Green Bond Principles issued by the International Capital Market Association in June 2025 and in accordance with the four core components of the Green Loan Principles issued by the Loan Market Association in March 2025.

Restriction of Use

Our limited assurance report is issued exclusively for the information and use of **Secil**'s Board of Directors and in accordance with the "Introduction" section above and is not intended to be used for any other purpose. This report, together with the Green Finance Framework, may be shared by **Secil** with third parties, on its website or otherwise. We accept or assume no responsibility and deny any liability to any party other than **Secil** for our work, for this limited assurance report, or for the conclusions we have reached.

Lisbon, 9 December 2025

A handwritten signature in blue ink, appearing to read 'Pedro Jorge Quental e Cruz'.

KPMG & Associados

Sociedade de Revisores Oficiais de Contas, S.A.
(nr. 189 and registered at CMVM with the nr. 20161489)

Represented by
Pedro Jorge Quental e Cruz
(ROC nr. 1765 and registered at CMVM with the nr. 20161607)

Appendices

Findings and observations related to particular aspects of the engagement

We provide a summary of our assurance procedures under the external review form recommended by ICMA (Appendix I) and findings and observations in alignment with ICMA's pre-issuance checklist to the GBP (Appendix II) for the core components and findings and observations in alignment with the GLP (Appendix III), to provide the reader with further understanding on how the Green Finance Framework meets the Criteria. These observations are not intended to detract from our conclusion provided above.

We have included **Secil's** Green Finance Framework as Appendix IV.

Appendix I – External Review Form

Section 1. Basic Information

Issuer name	Secil – Companhia Geral de Cal e Cimento, S.A.
Framework name	Green Finance Framework
Independent External Review provider's name	KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A. ("KPMG")
Completion date of this form	9 th of December of 2025

Section 2. Review overview

SCOPE OF REVIEW

The review:

- assessed the 4 core components of the Principles (**complete review**) and confirmed the alignment with the GBP and GLP.
- assessed only some of them (**partial review**) and confirmed the alignment with the GBP and GLP; please indicate which ones:
 - Use of Proceeds
 - Management of Proceeds
 - Process for Project Evaluation and Selection
 - Reporting
- assessed the alignment with other regulations or standards (CBI, EU GBS, ASEAN Green Bond Standard, ISO 14030, etc.); please indicate which ones:

ROLE(S) OF Independent External REVIEW PROVIDER

- Second Party Opinion
- Verification
- Other: **Independent Limited Assurance Report**, in accordance with 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).

Does the review include a sustainability quality score?

- Of the issuer
- Of the framework
- No scoring
- Of the project
- Other (please specify):

ASSESSMENT OF THE PROJECT(S)

Does the review include:

- The environmental features of the type of project(s) intended for the Use of Proceeds?
- The environmental benefits and impact targeted by the eligible Green Project(s) financed by the Green Bond and Loan?
- The potentially material environmental risks associated with the project(s) (where relevant)?

ISSUER'S OVERARCHING OBJECTIVES

Does the review include:

- An assessment of the issuer's overarching sustainability objectives and strategy, and the policies and/or processes towards their delivery?
- An identification and assessment of environmental, social and governance related risks of adverse impact through the Issuer's actions and explanations on how they are managed and mitigated by the issuer?
- A reference to the issuer's relevant regulations, standards, or frameworks for sustainability-related disclosure and reporting?

ISSUER'S OVERARCHING OBJECTIVES

Does the review include:

- The issuer's climate transition strategy & governance?
- The alignment of both the long-term and short/medium-term targets with the relevant regional, sector, or international climate scenario?
- The credibility of the issuer's climate transition strategy to reach its targets?
- The level/type of independent governance and oversight of the issuer's climate transition strategy (e.g., by independent members of the board, dedicated board sub-committees with relevant expertise, or via the submission of an issuer's climate transition strategy to shareholders' approval).
- If appropriate, the materiality of the planned transition trajectory in the context of the issuer's overall business (including the relevant historical datapoints)?
- The alignment of the issuer's proposed strategy and targets with appropriate science-based targets and transition pathways that are deemed necessary to limit climate change to targeted levels?
- The comprehensiveness of the issuer's disclosure to help investors assess its performance holistically?

EXECUTIVE SUMMARY OF REVIEW AND/OR LINK TO FULL REVIEW

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Green Finance Framework is not prepared, in all material respects, in accordance with the four core components of the Green Bond Principles issued by the International Capital Market Association in June 2025 and with the four core components of the Green Loan Principles issued by the Loan Market Association in March 2025.

Section 3. Detailed review

1. USE OF PROCEEDS

Does the review assess:

- the environmental benefits of the project(s)?
- whether those benefits are quantifiable and meaningful?

Does the review assess if the issuer provides clear information on:

- the estimated proceeds allocation per project category (in case of multiple projects)?
- the estimated share of financing vs. re-financing (and the related lookback period)?

Overall comment on this section:

See Appendix II and Appendix III of the Independent Limited Assurance Report.

2. PROCESS FOR PROJECT EVALUATION AND SELECTION

Does the review assess:

- whether the eligibility of the project(s) is aligned with official or market-based taxonomies or recognised international standards? Please specify which ones.
- whether the eligible projects are aligned with the overall sustainability strategy of the issuer and/or if the eligible projects are aligned with material ESG-related objectives in the issuer's industry?
- the process and governance to set the eligibility criteria including, if applicable, exclusion criteria?
- the processes by which the issuer identified and manages perceived environmental risks associated with the relevant project(s)?
- any process in place to identify mitigants to known material risks of negative environmental impacts from the relevant project(s)?

Overall comment on this section:

See Appendix II and Appendix III of the Independent Limited Assurance Report.

3. MANAGEMENT OF PROCEEDS**Does the review assess:**

- the issuer's policy for segregating or tracking the proceeds in an appropriate manner?
- the intended types of temporary investment instruments for unallocated proceeds?
- whether an external auditor will verify the internal tracking of the proceeds and the allocation of the funds?

Overall comment on this section:

See Appendix II and Appendix III of the Independent Limited Assurance Report. Regarding the external auditor verification over internal tracking of proceeds and the allocation of the funds, it is stated in section 4.3 *Management of Proceeds* of the Framework that 'All cash flows and balances will be performed through and accounted for in Secil's accounts and will be monitored by the Financial teams of the company', but it does not indicate that these internal teams will be externally audited. However, section 5.2 *Limited Assurance on the Allocation and Impact Reporting (post-issuance)* clarifies that an independent external party will annually provide limited assurance on Secil's Allocation and Impact Report until full allocation of proceeds from the Green Finance Instruments, covering the internal tracking method, the allocation of proceeds, and the remaining unallocated balance, thus addressing this point.

4. REPORTING**Does the review assess:**

- the expected type of allocation and impact reporting (bond-by-bond/loan-by-loan or on a portfolio basis)?
- the frequency and the means of disclosure?
- the disclosure of the methodology of the expected or achieved impact of the financed project(s)?

Overall comment on this section:

See Appendix II and Appendix III of the Independent Limited Assurance Report.

Section 4. Additional information**Useful links:**

Secil's corporate website: <https://www.secil.pt/en/sustainability>

Analysis of the contribution of the project(s) to the UN Sustainable Development Goals:

The Green Finance Framework states the projects being developed under the Framework will directly and indirectly contribute to the following UN Sustainable Development Goals (SDG): SDG 6 (Clean Water and Sanitation), SDG 7 (Affordable and Clean Energy), SDG 9 (Industry, Innovation and Infrastructure), SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).

Additional assessment in relation to the issuer/framework/eligible project(s):

See Appendix II and Appendix III of the Independent Limited Assurance Report.

Appendix II - Green Bond Principles issued by the International Capital Market Association (“ICMA”) in June 2025

Findings and observations related to particular aspects of the engagement

We provide a summary of our findings and observations in alignment with ICMA's pre-issuance checklist to the GBP for the core components, to provide the reader with further understanding on how the Green Finance Framework meets the Criteria. These observations are not intended to detract from our conclusion provided above.

STRATEGY AND RATIONALE			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Rationale for Green Bond issuance	Description of the reasoning for issuing a Green Bond.	Recommendation	<p>The Framework states that sustainability is a core element of Secil's long-term strategy and is fundamental to the Entity's ambition of contributing to the decarbonisation of the construction value chain. The Framework states that the Entity seeks to reduce the environmental footprint associated with its operations and products and to support the transition towards a low-carbon and circular economy.</p> <p>The Framework states that the Entity believes that green finance instruments are effective tools to channel investments into projects with tangible climate and environmental benefits. According to the Framework, the Entity intends to align its funding with its sustainability roadmap and to expand access to a broader investor community, strengthen relationships with responsible investors, and actively contribute to the development of the green finance market. In doing so, as the Framework states, the Entity ensures the projects contribute to the achievement of the United Nations' Sustainable Development Goals (UN's SDGs).</p>

			<p>The Framework further states that it is intended to be used to execute financings, which may include, but are not limited to, debt securities, including green bonds, loans and/or commercial paper programmes, whose proceeds will be used exclusively to finance and/or refinance, in part or in full, new and/or existing eligible green assets.</p>
Sustainability strategy – issuer	<p>It is recommended that issuers summarise in their Green Finance framework relevant information to provide the context of the issuer's overarching objectives, strategy, policy and/or processes relating to sustainability.</p> <p>Environmental Sustainability Strategy:</p> <p>This may include reference to the five high level environmental objectives of the GBP (climate change mitigation, climate change adaptation, natural resource conservation, biodiversity conservation, and pollution prevention and control).</p> <p><i>For example, if the Green Bond's use of proceeds is invested in clean energy projects, the issuer should provide the rationale for how those projects will support the issuer's decarbonisation efforts. If possible, provide a quantification of the green projects' contribution towards the realisation of the relevant environmental strategy and decarbonisation targets – Greenhouse Gases (GHG) reduced/avoided and/or renewable capacity installed.</i></p> <p>It is recommended that issuers with a published decarbonisation trajectory also include reference to relevant external, industry or sector benchmarks (e.g., SBTi) and to provide disclosures aligned to each of the four elements of the CTFH in order to credibly articulate how the identified use of proceeds fits into the achievement of the overall strategy.</p> <p>Transition may have positive or negative impacts for workers, communities, and surrounding environments. Therefore, where relevant, issuers are encouraged to outline how they have incorporated consideration of a "just transition" into their climate transition strategy and may also detail any social expenditures that are considered relevant.</p>	Recommendation	<p>According to the Framework, the Entity is committed to sustainability and seeks to reconcile its economic performance with respect for the environment and responsible citizenship. The Entity states in its Framework that the response to global climate change involves the reduction of the carbon intensity of production, and the promotion of biodiversity and a circular economy, which the Framework states the Entity has accepted as challenges that will be overcome with continued creation of economic value. As such, and according to the Framework, the Entity has designed a strategy that is upheld by an empowered and autonomous internal team. Secil's strategy aims to:</p> <ul style="list-style-type: none"> – Achieve carbon neutrality in the cement and concrete value chains by 2050, – Contribute to a circular economy through the co-processing of alternative fuels and raw materials, – Promote a health and safety culture that will allow for the reduction of work-related accidents and eliminate fatalities, – Support equal opportunities and promote diversity in management decisions, – Develop strong synergies with local communities, with the aim to give back to the Entity's neighbours and stakeholders, – Focus on the customer to provide them with exceptional customer experience, and – Do all the above while respecting human and labour rights with ethics, integrity and corporate responsibility. <p>The Framework states that the Entity takes part in international institutions and partnerships with the additional aim of having a clear, transparent governance model that allows the Entity to anticipate risks and opportunities. As stated in the Framework, the Entity's</p>

<p>Common question(s) from the pre-issuance external reviewers: <i>Is the activity integrated into the issuer's business model?</i> <i>(For example, what proportion of the issuer's income and/or investments are linked to such activities? How has it been changing over the last few years? What are relevant short-term, medium-term and long-term targets?)</i></p>	<p>Sustainability Policy (https://www.secil-group.com/en/sustainability/sustainability-at-secil/sustainability-policy) defines objectives and prioritizes actions that contribute, according to the Framework, to a better life on a planet that supports all of humanity. In alignment with its policy, the Entity has, according to the Framework, developed an internal framework to achieve its strategy named ESG+E, which covers the Environmental, Social, Governance and Economic pillars and is based on the Entity's material topics:</p> <ul style="list-style-type: none"> – Environmental (E): carbon neutrality; air emissions; circular economy; resources & energy efficiency; biodiversity; water. – Social (S): health & safety; stakeholder engagement; social responsibility; equity, diversity & inclusion; human & labour rights. – Governance (G): corporate governance; organization strategy; ethics, integrity & compliance; sustainability management; reporting. – Economic (E): sustainable economic growth; sustainable finance; sustainable procurement; customer centricity. <p>According to the Framework, the Entity is a member of the Global Cement and Concrete Association (GCCA), which has issued a charter of ten commitments for the sector to contribute to the achievement of the SDGs. As stated in the Framework, the Entity has subscribed these ten commitments, which it intends to meet in the 2020-2030 horizon, with well-defined indicators and targets. Additionally, according to the Framework, the Entity has committed to the promotion of a more sustainable development model with the signing of the Manifesto promoted by the Business Council for Sustainable Development (BCSD) Portugal.</p> <p>The Framework states that the Entity has defined a roadmap for decarbonisation called <i>Secil's Path to Decarbonisation</i> and based on the Cembureau 5C's methodology. According to the Framework, the roadmap lays out the Entity's path toward the decarbonisation of its cement plants, with intermediate targets established for 2030 and carbon neutrality by 2050. The 2030 targets, as stated in the</p>
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		<p>Framework, are aligned with the 1.5 °C trajectory in line with the goals of the Paris Agreement, having been validated in 2024 by the Science Based Targets initiative (SBTi). The Framework states that the roadmap is supported by the implementation of a set of actions underpinned by internal investment plans extending through 2050 and ensures a fair transition by supporting workers, suppliers, and local communities, where applicable, throughout the decarbonization process. To ensure a fair transition in alignment with the recommendations of the Climate Transition Finance Handbook 2025, the Entity, according to the Framework, promotes continuous training and upskilling initiatives to prepare its workforce for the technological transformation of cement production and engages with local stakeholders through environmental monitoring committees and community development projects designed to foster inclusion and minimize potential negative social impacts arising from the transition to a low-carbon economy.</p> <p>The Framework states that reductions in the Entity's Scope 1 Greenhouse Gas (GHG) emissions will be achieved through the modernization of facilities with more efficient and proven technologies, which will reduce heat consumption and increase the rate of use of alternative fuels with CO₂-neutral content with the support of green hydrogen, decarbonated raw materials in clinker production, and alternative raw materials with pozzolanic properties in cement production. According to the Framework, the Clean Cement Line (CCL) project was the first major decarbonization carried out by the Entity and occurred in its Outão plant in Portugal. As stated in the Framework, the Profuture project, currently underway in the Maceira-Liz plant in Portugal is the second major project aligned with the Entity's decarbonization strategy and has as its main objective the elimination of fossil fuel usage in the plant and the increase in the plant's energy efficiency, thereby reducing GHG emissions and reinforcing the Entity's commitment to innovation and sustainability.</p> <p>According to the Framework, the Entity will assess available and emerging technologies to select those best suited to be incorporated</p>
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		<p>in its plants between 2030 and 2050. The Framework indicates that one of the options currently under evaluation is the use of captured CO₂ either through the forced carbonation of the Entity's materials or to produce synthetic fuels (e-fuels) and the Entity is currently identifying the infrastructure required to use or store this CO₂ safely. By 2040, as stated in the Framework, the Entity plans to invest over 150 million Euros in a variety of decarbonization projects that focus on traditional levers such as alternative fuels and secondary raw materials, low-carbon clinkers, reduction of the clinker factor, and thermal energy efficiency measures.</p> <p>The Framework further states that the process of identifying and managing environmental and social risks at the Entity is carried out through the Double Materiality assessment in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the EFRAG guidelines, with mitigation measures established over the assessed negative impacts.</p> <p>The Framework states that the Entity is not excluded from the EU Paris Agreement-aligned benchmark indicators and states that the Entity's economic activities are covered by the EU Taxonomy Regulation. As stated in the Framework, the Entity expects to achieve 86% alignment by 2030 which, as stated reinforces the Entity's transition towards a sustainable economy. Additionally, the Framework states that the stated sustainability commitments allow the Entity to align and consolidate its internal objectives, integrate the perspectives of all stakeholders, position the Entity alongside its peers and contribute to the achievement of the UN SDGs.</p> <p>As stated in the Framework, the Entity closely monitors the challenges of sustainable development and, as such, the UN's SDGs are included in the Entity's agenda and are periodically reviewed and confirmed. The Framework states that the Entity has established three levels of SDGs:</p> <ul style="list-style-type: none"> – Level 1: Strategic – Level 2: Relevant
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			<ul style="list-style-type: none"> – Level 3: Support <p>According to the Framework, the SDG are mapped as follows:</p> <ul style="list-style-type: none"> – Level 1: SDG 9 (Industry, Innovation and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action), – Level 2: SDG 3 (Good Health and Wellbeing), SDG 8 (Decent Work and Economic Growth), and SDG 11 (Sustainable Cities and Communities), and – Level 3: SDG 17 (Partnerships for the Goals). <p>The Framework states that the ESG+E strategy will ensure the Entity's key contributions to achieve the SDGs in the following way:</p> <ul style="list-style-type: none"> – Environmental (E): Help reduce the impacts of climate change; help drive decarbonization; optimize energy consumption and use of alternative energy sources, including renewables; promote a circular economy and efficient use of natural resources; value and protection of biodiversity; develop RDI projects and establish partnerships to offer solutions with an impact on the construction value chain. – Social (S): build close relationships and stakeholder engagement; support the local community in the countries the Entity operates; provide decent work, training, and support for the career advancement of the Entity's employees, fostering health, safety, and wellbeing; uphold diversity, equity, inclusion, and non-discrimination in human rights internally and externally. – Governance (G): clearly define and monitor goals for the commitments included in the Strategy Plan – Ambition 2025 – Sustainable Growth; governance model supported by rules of ethics and conduct, integrity, transparency, and accountability; build a risk management model based on risk identification, mitigation measures, oversight, and evaluation. – Economic (E): drive economic growth and generate employment and wealth in the regions where the Entity operates; create decent work by protecting labour rights; drive innovation and develop new products and projects with a focus on quality and safety; build sustainability in the Entity's value
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			<p>chain and foster trusting relationships with customers and suppliers.</p> <p>Finally, the Framework states that the Entity initiated, in 2024, a process to identify climate-related risks and opportunities in line with the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) with the objective of assessing potential physical and transition risks related to climate change and developing appropriate climate change adaptation strategies.</p>
Sustainability governance – issuer	<p>Explain the issuer's governance and responsibilities around sustainability.</p> <p>Examples of items that can be included are:</p> <ul style="list-style-type: none"> • Description of the board's oversight and role in assessing and managing of climate-related risks and opportunities; • Board and management composition: board size, % of independent members, rotation, diversity (gender, age, ethnicity, geography), competence, qualifications; • Engagement: ability of the board to ensure the interest of shareholders, as well as the active role they play in setting the vision and sustainability strategy; • Sustainability strategy and associated performance targets: sustainability-related targets, processes, monitoring systems, formalised action plan and incentives mechanism (remuneration); • Sustainability-related policies: sustainability-related policies and operational guidelines, implemented by trainings, audits, etc.; • Social safeguards: human rights, labour rights, anti-corruption, anti-bribery; • Sustainability reporting. <p>Common question(s) from the Pre-Issuance External Reviewers:</p> <p><i>How does the company's strategy ensure that all activities are aligned with both social and green priorities?</i></p>	Recommendation	<p>The Framework states that the Entity is led by a two-tier Board of Directors with 4 executive and 4 non-executive directors, where the Chief Executive Officer (CEO) is charged with the promotion of sustainability topics within the business, as well as with the approval of related strategic objectives, strategic initiatives, and priority actions. According to the Framework, there is an Executive Director responsible for environmental and climate-related issues and, since 2025, an Executive Director responsible for social issues.</p> <p>The Framework states that in 2021, when the Entity's strategic plan was defined, one of its defined seven elements was Sustainability, over which the project ESG+E was created. According to the Framework, the Entity's Sustainability Department was created in 2023 and the ESG+E project was incorporated into its responsibilities, where the Sustainability Manager coordinates all topics under the Sustainability Framework with the support of the responsible persons of each of the ESG+E pillars and all managers involved in the Sustainability Committee. According to the Framework, the said Sustainability Committee, which was created in 2018, has had its reach extended to all business areas and all geographies and is composed of all elements involved in the various Sustainability topics within the Entity.</p>

		<p>Regarding the <i>Responsible Business Conduct</i> topic, the Framework states that the principles of ethics, compliance and respect for human rights are integrated into the Entity's Governance model and are extended to all geographies where the Entity operates. Additionally, the Framework states that the Entity's Code of Conduct mirrors the Entity's responsible conduct and, in 2024, the Entity developed an additional group of policies to increase the robustness and clarity of the principles of ethics and compliance across its operations (Corruption Prevention Policy; Policy on the Prevention of Money Laundering and Terrorist Financing; Fair Competition Policy; Stakeholder Engagement Policy; Human and Labour Rights Policy).</p> <p>Regarding the <i>Involvement with stakeholders</i>, the Framework states that stakeholders are a key part of the way in which the Entity manages its business model. As stated in the Framework, the Entity has been promoting the opening of channels that make it possible for different actors that are impacted by the Entity's operations to be heard and be involved in the Entity's decision-making process. As such, and according to the Framework, in 2024 the Entity developed a Stakeholder Engagement Policy and put in place a Stakeholder Engagement Program whose objectives were to:</p> <ul style="list-style-type: none"> – Strengthen dialogue with stakeholders, enhancing the creation of partnerships and promoting the exchange of experiences, resources, knowledge, skills, and efforts, – Integrate stakeholder expectations, – Promote the intervention and continuous identification of possible impacts on the communities surrounding the areas where the Entity carries out its activities, – Enrich surrounding communities through job creation, local hiring, and community involvement, – Contribute to the improvement of the well-being of populations and promote initiatives to support the development of communities and places where the Entity is located, – Refrain from any undue interference in local political activity, – Allow the access of relevant corporate information and development of the Entity's activity by stakeholders,
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			<ul style="list-style-type: none"> – Include relevant contributions identified by stakeholders in the Entity's strategy, and – Encourage the reporting of operations suspected of breaching the standards and good practices set out in the policy through the usual reporting procedures or, alternatively, through the Secil Group Integrity Channel.
Supporting regulations, standards, or framework for sustainability-related disclosure and reporting – issuer	<p>Issuers are encouraged to create disclosures regarding issuer strategies and their alignment with recognised initiatives, standards and/or reporting frameworks which are numerous and issued by multiple regional entities. These may include:</p> <ul style="list-style-type: none"> • Supporting regulation such as: EU Non-Financial Reporting Directive (NFRD) – EU Corporate Sustainability Reporting Directive (CSRD) - EU Sustainable Finance Disclosure Regulation (SFDR). • Climate reporting standards and carbon pathway methodologies such as: TCFD, SBTi, PRI, TPI. • ESG reporting such as: GRI, SASB, CDP. 	Recommendation	<p>The Framework states that it is aligned with the four core components of the Green Bond Principles issued by the International Capital Market Association in June 2025 and with the four core components of the Green Loan Principles issued by the Loan Market Association in March 2025.</p> <p>The Framework further states that the process to identify and manage social and environmental risks was carried out through the Double Materiality assessment in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the EFRAG guidelines and that the Entity has begun the process to identify climate-related risks and opportunities in line with the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD).</p>

GBP COMPONENT 1: USE OF PROCEEDS			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Green projects	<p>A description of the issuer's selected green projects should be appropriately described in the Green Finance framework or in the legal documentation of the security. All designated green projects should provide clear environmental benefits, which will be assessed and, where feasible, quantified by the issuer. Issuers are encouraged to provide further details on the project category, such as type of technology being considered.</p> <p>Common question(s) from the pre-issuance external reviewers:</p> <p><i>Does the activity/project provide clear environmental benefits that can be monitored, quantified and are attributable (at least indirectly) to the activity/project?</i></p>	Core	<p>The Framework states that the Green Finance Framework was established to execute financings, which may include, but are not limited to, debt securities, including green bonds, loans and/or commercial paper programmes, whose proceeds will be used exclusively to finance and/or refinance, in part or in full, new and/or existing eligible green assets.</p> <p>The Framework states that eligible green assets will fall within six main environmental objectives or groups of objectives: (1) Pollution prevention and control, (2) Energy efficiency, (3) Renewable energy, (4) Circular economy adapted products, production technologies and processes, (5) Circular economy / energy efficiency, and (6) Sustainable water and wastewater management.</p> <p>In terms of the eligible category (1) Pollution prevention and control, the Framework states that the Entity's eligible assets are projects that prevent, reduce, or control emissions of air pollutants or GHGs and other environmental impacts across the Entity's operations, which may include the use of low-carbon fuels and raw materials, technologies to reduce air pollutants such as SO_x, NO_x and particulate matter, improvements in emissions monitoring systems, water treatment and waste management measures. As stated in the Framework, these projects would be consistent with the Entity's publicly disclosed climate commitments, validated by the SBTi, including the reduction of Scope 1 and Scope 2 GHG emissions by 30.4% per tonne of cement by 2030 compared to a 2020 baseline (equivalent to a reduction from 781 kgCO₂e/t cement in 2020 to 544 kgCO₂e/t cement in 2030). According to the Framework, an eligible project would be the Profuture project in the Maceira plant, which includes the modernization of Line 6 with advanced low-carbon</p>

		<p>technologies, including alternative fuels and green hydrogen integration.</p> <p>In terms of the eligible category (2) Energy efficiency, the Framework states that the Entity's eligible assets are projects of implementation of technologies and measures aligned with Best Available Technologies (BAT) and other innovations that aim to improve efficiency and reduce thermal and electrical energy consumption across clinker productions and other operations. According to the Framework, an eligible project would be the digitalization of kiln operations and advanced monitoring systems installed at the Entity's plants.</p> <p>In terms of the eligible category (3) Renewable energy, the Framework states that the Entity's eligible assets are projects that integrate renewable and low-carbon energy sources into the Entity's operations, which may include the use of renewable electricity, green hydrogen or other biogenic fuels, as well as recovery and reuse of residual energy flows. According to the Framework, eligible projects would be the increase in the use of alternative fuels through the installation of a dryer and enabling the use of more biogenic fuel streams and the pilot integration of green hydrogen in clinker production in the Profuture Project.</p> <p>In terms of the eligible category (4) Circular economy adapted products, production technologies and processes, the Framework states that the Entity's eligible assets are projects that promote circular economy and resource efficiency across the Entity's operation, which may include adapted production technologies and processes that enable the substitution of virgin raw materials with secondary or recycled inputs, the use of supplementary cementitious materials (e.g., pozzolanic or other suitable materials), the incorporation of industrial by-products, the development of low-carbon cement and concrete, and the valorisation of constructed and demolition waste. According to the Framework, eligible projects would be the increased use of pozzolanic and silico-aluminous materials as</p>
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		<p>clinkers substitutes, the expansion of alternative fuels co-processing, and the development and industrial deployment of calcined clays for clinker substitution at the Pataias plant.</p> <p>In terms of the eligible category (5) Circular economy / energy efficiency, the Framework states that the Entity's eligible assets are projects that improve resource and energy efficiency through the recovery and reuse of residual energy and materials, which may include waste heat recovery for internal process use, the preparation and drying of alternative fuels and raw materials, or other technologies that enable more efficient use of resources across the Entity's operations. According to the Framework, eligible projects would include the integration of recovered process heat to enable the use of alternative fuels and the thermal activation of supplementary cementitious materials (SCMs), supporting clinker substitution and improved energy efficiency.</p> <p>In terms of the eligible category (6) Sustainable water and wastewater management, the Framework states that the Entity's eligible assets are projects that enhance water efficiency and sustainable water use across the Entity's cement, concrete, and aggregates operations, which may include initiatives to reduce freshwater consumption in industrial processes, optimise water recycling and reuse, and improvement water management systems. According to the Framework expenditures associated with this eligible category may also cover the development, upgrading, or installation of technologies to improve wastewater treatment and effluent quality, the deployment of efficient water-related equipment, and investments in systems for wastewater recycling, recovery and safe discharge. According to the Framework, eligible projects would include the implementation of water-efficient technologies and reuse/recycling systems and the improvement of water management systems.</p>
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<p>Environmental benefits</p>	<p>Taking into account the local context and business activity of the issuer, will the intended activity/project/asset provide and/or ensure a short- or long-term environmental improvement?</p> <p>Common question(s) from the pre-issuance external reviewers:</p> <p><i>Can the issuer demonstrate that the project/activity/asset will provide clear and relevant environmental improvements (based on evidence, research, international standards, etc.)?</i></p>	<p>Core</p>	<p>In terms of the eligible category (1) Pollution prevention and control, the Framework states that the expected environmental benefits include the replacement of fossil fuels with alternative fuels, the reduction of SOx and other gaseous emissions, and the improvement of compliance with BAT-AEL emission limits. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the sustainable use and protection of water and marine resources, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Improving water management and efficiency, including by protecting and enhancing the status of aquatic ecosystems, by promoting the sustainable use of water through the long-term protection of available water resources, <i>inter alia</i>, through measures such as water reuse, by ensuring the progressive reduction of pollutant emissions into surface water and groundwater, by contributing to mitigating the effects of floods and droughts, or through any other activity that protects or improves the qualitative and quantitative status of water bodies. <p>Additionally, according to the Framework, projects in this eligible category also have as a goal to contribute substantially to pollution prevention and control, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Preventing or, where that is not practicable, reducing pollutant emissions into air, water or land, other than greenhouse gases, and – Improving levels of air, water or soil quality in the areas in which the economic activity takes place whilst minimizing any adverse impact on human health and the environment or the risk thereof. <p>In terms of the eligible category (2) Energy efficiency, the Framework states that the expected environmental benefits include the improvement of energy efficiency within the Entity's operations. These environmental benefits have, as a final goal, to contribute</p>
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		<p>towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to climate change mitigation, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Improving energy efficiency, except for power generation activities as referred to in Article 19(3) of the EU Taxonomy Regulation. <p>In terms of the eligible category (3) Renewable energy, the Framework states that the expected environmental benefits include the replacement of fossil fuels with renewable-based green hydrogen and the enabling of full decarbonization of thermal energy supply. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to climate change mitigation, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Generating, transmitting, storing, distributing or using renewable energy in line with Directive (EU) 2018/2001, including through innovative technology with a potential for significant future savings or through necessary reinforcement or extension of the grid. <p>Additionally, according to the Framework, projects in this eligible category also have as a goal to contribute substantially to the transition to a circular economy, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Using natural resources, including sustainably sourced bio-based and other raw materials, in production more efficiently, including by (i) reducing the use of primary raw materials or increasing the use of by-products and secondary raw materials, or (ii) resource and energy efficiency measures. <p>In terms of category (4) Circular economy adapted products, production technologies and processes, the Framework states that the expected environmental benefits include the promotion of industrial symbiosis, the reduction of the clinker factors and embodied</p>
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		<p>CO₂, and the extension of the lifecycle of cement-based materials. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the transition to a circular economy, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Using natural resources, including sustainably sourced bio-based and other raw materials, in production more efficiently, – Prolonging the use of products, including through reuse, design for longevity, repurposing, disassembly, remanufacturing, upgrades, and repair, and sharing products, and – Preventing or reducing waste generation, including the generation of waste from the extraction of minerals and waste from the construction and demolition of buildings. <p>In terms of category (5) Circular economy / energy efficiency, the Framework states that the expected environmental benefits include the increase in system-wide energy recovery and the enabling of the substitution of high-moisture AFs with biogenic alternatives. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the transition to a circular economy, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Using natural resources, including sustainably sourced bio-based and other raw materials, in production more efficiently, – Preventing or reducing waste generation, including the generation of waste from the extraction of minerals and waste from the construction and demolition of buildings, and – Prolonging the use of products, including through reuse, design for longevity, repurposing, disassembly, remanufacturing, upgrades and repair, and sharing products. <p>In terms of category (6) Sustainable water and wastewater management, the Framework states that the expected environmental</p>
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			<p>benefits include the continuous reduction in freshwater consumption across operations and an insurance that all wastewater is treated before discharge. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the sustainable use and protection of water and marine resources, especially with regards to but limited to:</p> <ul style="list-style-type: none"> – Protecting the environment from the adverse effects of urban and industrial wastewater discharges, including from contaminants of emerging concern such as pharmaceuticals and microplastics, for example by ensuring the adequate collection, treatment and discharge of urban and industrial wastewaters, – Protecting human health from the adverse impact of any contamination of water intended for human consumption by ensuring that it is free from any microorganisms, parasites and substances that constitute a potential danger to human health as well as increasing people's access to clean drinking water, and – Improving water management and efficiency, including by protecting and enhancing the status of aquatic ecosystems, by promoting the sustainable use of water through the long-term protection of available water resources, <i>inter alia</i>, through measures such as water reuse, by ensuring the progressive reduction of pollutant emissions into surface water and groundwater, by contributing to mitigating the effects of floods and droughts, or through any other activity that protects or improves the qualitative and quantitative status of water bodies.
Multiple projects	<p>Description of the estimated proceeds allocation per green project category.</p> <p>If unknown at time of issuance, please indicate when this will be determined.</p>	Core	<p>The Framework indicates that the eligible green projects may fall into one or more of each of the six identified eligible categories. These are: (1) Pollution prevention and control, (2) Energy efficiency, (3) Renewable energy, (4) Circular economy adapted products,</p>

			<p>production technologies and processes, (5) Circular economy / energy efficiency, and (6) Sustainable water and wastewater management.</p> <p>According to the Framework, the eligible green projects may include capital expenditures, operating expenditures related to implementation, and research and development (R&D) expenditures, and may be carried out by the Entity or its subsidiaries in Portugal, provided they meet the eligibility criteria.</p> <p>The Framework further states that the Entity will allocate proceeds to eligible green projects selected in accordance with the eligibility criteria within up to 36 months of issuance of the green finance instruments. It states, however, that at the time of publication of the Framework, the Entity cannot estimate the amounts that will be financed or refinanced.</p>
Refinancing	<p>Description of the estimated share of financing vs. re-financing, and where appropriate, also clarify which investments or project portfolios may be refinanced, and, to the extent relevant, the expected look-back period for the refinanced green projects.</p> <p>If unknown at time of issuance, please indicate when this will be determined.</p> <p>Please note that:</p> <ul style="list-style-type: none"> • Green projects qualify for refinancing as long as they are in use, follow the relevant eligibility criteria at the time of issuance and are still assessed as making a meaningful impact. • Different lookback periods may apply for Capex, Opex and assets. 	Recommendation	<p>The Framework states that the Entity will allocate proceeds to eligible green projects selected in accordance with the eligibility criteria within up to 36 months of issuance of the green finance instruments. It states, however, that at the time of publication of the Framework, the Entity cannot estimate the amounts that will be financed or refinanced, while adding that such information will be reflected in the Allocation and Impact Report.</p>

GBP COMPONENT 2: PROCESS FOR PROJECT EVALUATION & SELECTION			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Evaluation and selection of green projects	<p>Description of the governance process by which the green projects are evaluated and selected including:</p> <ul style="list-style-type: none"> details on who will be part of the process to select eligible projects for allocation; the alignment with the Use of Proceeds Categories (qualitative and quantitative inclusion criteria and, if applicable, exclusion criteria); and the alignment with official or market-based taxonomies, (e.g., qualitative and quantitative criteria and if applicable, exclusion criteria). <p>Issuers should also clearly communicate the environmental sustainability objectives of the green projects and should describe how the selected projects fit within the issuer's wider sustainability strategy, goals and objectives.</p>	Core Recommendation Core	<p>The Framework states that the Entity established a structured decision-making process to determine the eligibility of green projects in accordance with the eligibility criteria set out in the Use of Proceeds chapter.</p> <p>The Framework states that the selection of the eligible green projects was carried out by the Entity's Executive Committee, based on prior assessments and recommendations from the Finance, Sustainability, Technical, and other relevant business teams, as deemed necessary, in line with the eligibility criteria defined in the Framework.</p> <p>The Framework states that the allocation of proceeds, whether for financing or refinancing eligible green projects, is set to be authorized by the Entity's Chief Financial Officer (CFO), following the project's selection by the Executive Committee, who ensures and guarantees that the allocation of funds complies with the principles and requirements established in the Framework.</p>
Associated risks	<p>Description of the process applied to identify and manage perceived/known social and environmental risks associated with the relevant projects.</p> <p>It is recommended that issuers have a process in place to identify mitigants to key social and/or environmental risks associated with the eligible project(s). Such mitigants may include clear and relevant trade-off analysis undertaken and monitoring required where the issuer assesses the potential risks to be meaningful.</p>	Core	<p>The Framework states that the process of identifying and managing social and environmental risks at Entity level is carried out through the Double Materiality assessment, in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the EFRAG guidelines. As further stated, the necessary mitigation measures are established based on the negative impacts assessed.</p> <p>The Framework further states that the Entity promotes continuous training and upskilling initiatives to prepare its workforce for the technological transformation of cement production. As stated in the Framework, the Entity additionally engages with local stakeholders</p>

	<p>Where relevant, issuers may seek to highlight how their green or transition projects may incorporate elements of a “just transition” either through risk reduction or social co-benefits.</p> <p>Common question(s) from the pre-issuance external reviewers:</p> <ul style="list-style-type: none"> • <i>Would the considered use of proceeds have a significant negative impact on the other environmental objectives, or on other vulnerable groups or social areas?</i> • <i>What measures can be implemented to avoid or at least minimise the negative impact of the activity/project?</i> • <i>Is the commitment to identify and manage potentially material social and/or environmental risks, as well as international conventions and recommendations or local labour laws formalised and detailed in the framework?</i> 	Recommendation	<p>through environmental monitoring committees and community development projects designed to foster inclusion and minimize potential negative social impacts arising from the transition to a low-carbon economy. The Framework states that these actions underpin a fair and inclusive transition, consistent with the recommendations of the Climate Transition Finance Handbook 2025.</p> <p>The Framework states that to ensure that the assets financed and/or refinanced under the Framework are evaluated and selected based on compliance with the eligibility criteria, the Entity complies with applicable national, European, and international environmental and social standards and regulations, including the United Nations Principles for Human Rights and the International Labour Organisation’s core labour conventions, to ensure stringent management of potential negative environmental and social impacts associated with the eligible green assets. As stated in the Framework, the Entity has signed the CEO Guide for Human Rights of the World Business Council for Sustainable Development (WBCSD).</p>
Official or market-based taxonomies, green standards or certifications referenced	<p>Issuers are also encouraged to identify alignment of their Green Finance framework and their green projects with official or market-wide taxonomies and to reference any green standards or certifications used which may include: GBP, EU taxonomy for Sustainable Activities, ISO 14030, China’s Guidelines for issuing Green Bonds, ASEAN Green Bond Standards, Climate Bond Initiative Standard, Climate Transition Finance Handbook (CTFH) etc. if applicable.</p> <p>It is also recommended to provide information, if relevant and applicable, on exclusion criteria used.</p>	Recommendation	<p>The Framework states that it is aligned with the four core components of the International Capital Markets Association’s (ICMA) Green Bond Principles (GBP) of June 2025 and with the four core components of the Loan Market Association’s (LMA) Green Loan Principles (GLP) of March 2025.</p> <p>The Framework further stated that the Entity has developed continuous actions for its workforce and in engagement with local stakeholders that underpin a fair and inclusive transition, consistent with the recommendations of the Climate Transition Finance Handbook 2025.</p> <p>The Framework states that the Entity is not excluded from the EU Paris Agreement-aligned benchmark indicators and the Entity’s</p>

			<p>economic activities are covered by the EU's Taxonomy Regulation. Additionally, the Framework states that, in defining and assessing Eligible Green Projects, the Entity also considers the EU Taxonomy as a key reference framework and is committed to progressively align its investments with its objectives, including the technical screening the criteria, the DNSH (Do No Significant Harm) requirements and the Minimum Safeguards.</p> <p>The Framework states that to ensure that the assets financed and/or refinanced under the Framework are evaluated and selected based on compliance with the eligibility criteria, the Entity complies with applicable national, European, and international environmental and social standards and regulations, including the United Nations Principles for Humans Rights and the International Labour Organisation's core labour conventions, to ensure stringent management of potential negative environmental and social impacts associated with the eligible green assets. As stated in the Framework, the Entity has signed the CEO Guide for Human Rights of the World Business Council for Sustainable Development (WBCSD).</p>
SDGs alignment	<p>Issuers are also encouraged to identify alignment with market-wide green, social or development objectives, such as the Sustainable Development Goals (SDGs), to help investors that may use them as part of their investment decisions. Issuers can indicate alignment:</p> <ol style="list-style-type: none"> 1) At a company level (if applicable) 2) In respect of the green categories and/or projects to be funded by Green Bonds <p>It is recommended that issuers include in their Green Finance framework their methodology for alignment with the SDGs, and where applicable, incorporate this in their external review process. Issuers should provide as much clarity and detail as feasible on how specific SDGs are relevant to the issuance and not simply reference the SDGs in general.</p>	Recommendation	<p>The Framework states that the Entity's sustainability commitments allow the Entity to align and consolidate its internal objectives, integrate the perspectives of all stakeholders, position the Entity alongside its peers and contribute to the achievement of the UN's SDGs. As stated in the Framework, the Entity closely monitors the challenges of sustainable development and, as such, the UN's SDGs are included in the Entity's agenda and are periodically reviewed and confirmed. The Framework states that the Entity has established three levels of SDGs:</p> <ul style="list-style-type: none"> – Level 1: Strategic – Level 2: Relevant – Level 3: Support <p>According to the Framework, the SDG are mapped as follows:</p>

		<ul style="list-style-type: none"> – Level 1: SDG 9 (Industry, Innovation and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action), – Level 2: SDG 3 (Good Health and Wellbeing), SDG 8 (Decent Work and Economic Growth), and SDG 11 (Sustainable Cities and Communities), and – Level 3: SDG 17 (Partnerships for the Goals). <p>In terms of category (1) Pollution prevention and control, the Framework states that eligible green assets will be aligned with SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action).</p> <p>In terms of category (2) Energy efficiency, the Framework states that eligible green assets will be aligned with SDG 9 (Industry, Innovation, and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p> <p>In terms of category (3) Renewable energy, the Framework states that eligible green assets will be aligned with SDG 7 (Affordable and Clean Energy), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p> <p>In terms of category (4) Circular economy adapted products, production technologies and processes, the Framework states that eligible green assets will be aligned with SDG 9 (Industry, Innovation and Infrastructure), SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p> <p>In terms of category (5) Circular economy / energy efficiency, the Framework states that eligible green assets will be aligned with SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action).</p>
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			<p>In terms of category (6) Sustainable water and wastewater management, the Framework states that eligible green assets will be aligned with SDG 6 (Clean Water and Sanitation), SDG 9 (Industry, Innovation and Infrastructure), SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p>
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GBP COMPONENT 3: MANAGEMENT OF PROCEEDS			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Management of proceeds	<ul style="list-style-type: none"> Issuers should describe the governance within the company to manage the use of proceeds, including the supervision, tracking and reporting of the proceeds. The proceeds of green bonds can be managed per bond (bond-by-bond approach) or on an aggregated basis for multiple Green Bonds (portfolio approach). Proceeds should be credited to a sub-account, moved to a sub-portfolio or otherwise tracked in an appropriate manner (e.g., tagged in the internal accounting systems). The issuer can also choose to include a clause which states the commitment of the issuer to invest the proceeds [•] months after issuance. The issuer can inform on process in case a project no longer qualifies and the net proceeds originally allocated need to be reallocated. 	<p>Core</p> <p>Recommendation</p>	<p>The Framework states that all cash flows and balances will be performed through and accounted for in the Entity's accounts and will be monitored by the Entity's Financial teams.</p> <p>The Framework states that the Entity will allocate proceeds to eligible green projects selected in accordance with the eligibility criteria within up to 36 months of issuance of the green finance instruments. As stated in the Framework, at the date of issuance of the Framework, it is not yet possible to estimate the amounts that will be financed or refinanced, and this information will be reflected in the Allocation and Impact Report.</p> <p>The Framework states that the eligible green assets will be registered at their IFRS balance sheet value, updated annually to reflect investments and depreciation and may include both new financing and refinancing of existing projects. The Framework further states that if a look-back period applies for refinancing, such information will be disclosed in the Allocation and Impact Report.</p> <p>The Framework states that if any asset ceases to be eligible, the Entity will make its best efforts to replace it with another eligible green project as soon as practicable.</p> <p>The Framework states that the principal and interest payments of the green finance instruments under the Framework will be made from the Entity's general funds and will not be directly linked to the performance or execution of eligible green projects.</p>

Unallocated proceeds	Description of the intended types of temporary placement for the balance of unallocated net proceeds.	Core	<p>The Framework states that the Entity intends to allocate an amount equivalent to the net proceeds from each green finance instrument to eligible green projects as soon as reasonably practicable. The Framework further states that, pending allocation or reallocation, unallocated proceeds will be managed in line with the Entity's standard liquidity management practices, in cash, cash equivalents, or other liquid instruments that are consistent with the Framework. The Framework further states that if any asset ceases to be eligible, the Entity will make its best efforts to replace it with another eligible green project as soon as practicable.</p>
External review	<p>The management of proceeds may be externally verified, by an auditor or another independent third party, to verify the internal tracking method and the allocation of funds from the Green Bond proceeds. This verification is expected to take place annually or until full allocation.</p>	Recommendation	<p>The Framework states that the Entity will provide annual updates on activities related to its green finance issuance in the Allocation and Impact Report, where the Entity will seek to provide information on the allocation of proceeds as well as relevant impacts metrics, which will provide the assessment of the associated environmental impacts.</p> <p>According to the Framework, an independent external party, appointed by the Entity, will provide independent limited assurance on the Entity's Allocation and Impact Report until full allocation of proceeds from the green finance instruments.</p>

GBP COMPONENT 4: REPORTING			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Frequency, duration and level of allocation reporting	<p>The reporting should be renewed:</p> <ul style="list-style-type: none"> • Annually until full allocation of the proceeds of the relevant green bond. • In case of full allocation, on a timely basis in case of material developments. <p>The reporting can be done on the individual Green Bond level (bond-by-bond approach) or on aggregated level (portfolio approach).</p> <p>In case of bond-by-bond approach the issuer should clearly reference to which bond (ISIN) the reported impact belongs to.</p>	Core	<p>The Framework states that the Entity will prepare and maintain readily available reporting on the allocation of the proceeds to the eligible green projects. The Framework states that this reporting may take place in line with the Entity's general annual reporting cycle at least until the proceeds from the green finance issues have been fully allocated, through an annual Allocation and Impact Report. The Framework further states that once full allocation has been achieved, allocation reporting will only be provided in the event of material changes.</p> <p>The Framework states that the report on allocation in the Allocation and Impact Report will include:</p> <ul style="list-style-type: none"> – The total amount of eligible assets, – The portion (amount or percentage) of financing and refinancing, – A breakdown of what is financed and refinanced, and – The balance of unallocated proceeds. <p>The Framework states that the Allocation and Impact Report may be made available via the Entity's corporate website (https://www.secil-group.com/en/home) and will always be made accessible to interested parties. As further stated in the Framework, a summary of the Allocation and Impact Report may be published in the Entity's annual report.</p>
Frequency, duration and level of impact reporting	The report should include the output, expected/achieved outcome and/or impact of projects financed by Green Bond proceeds either on a project level or on a portfolio level throughout the life of the Green Bond or at a minimum, until full allocation of the proceeds.	Recommendation	The Framework states that the Entity will prepare and maintain readily available reporting on the impact of the eligible green projects. The Framework states that this reporting may take place in line with the Entity's general annual reporting cycle at least until the proceeds

	<p>Issuers are welcome to report throughout the life of the bond and are encouraged to make available the latest report either on their website or in another publicly available space, with the date that it was prepared.</p>		<p>from the green finance issues have been fully allocated, through an annual Allocation and Impact Report. The Framework further states that once full allocation has been achieved, impact reporting will no longer be mandatory but may continue throughout the life of the green finance instruments.</p> <p>The Framework states that the report on the impact in the Allocation and Impact Report will include:</p> <ul style="list-style-type: none"> – A brief description of the eligible projects and their contribution to the environmental objectives, and – Environmental impact indicators and metrics, per eligible green project.
Reporting indicators	<p>Description of the qualitative and quantitative impact metrics that will be used to demonstrate substantial contribution to environmental objectives per project category related to the criteria.</p> <p>For the calculation of indicators, where there is no single commonly used standard, issuers may follow their own methodologies while making these available to investors. For the calculation of greenhouse gas (GHG) emissions reduced/avoided, for instance, there are a number of calculation methodologies both within and across institutions. Issuers should be transparent as to the calculation methodologies used.</p> <p>The impact report should illustrate the expected/achieved environmental impact made possible as a result of projects to which green bond proceeds have been allocated.</p> <p>The expected environmental impacts should be based on ex-ante estimates (developed prior to project implementation) of expected annual results for a representative year once a project is completed and operating at normal capacity. In case of reporting on a portfolio level, ex-ante estimates can be based on the annual analyses per portfolio and, if several categories are financed, per category, if possible.</p>	Recommendation	<p>The Framework states that four main indicators have already been identified:</p> <ul style="list-style-type: none"> – CO₂ emissions, – Total energy consumption reduction, – Alternative fuel substitution rate, and – Total water withdrawal reduction. <p>According to the Framework, additional indicators may also be reported in the annual Allocation and Impact Report, where relevant, to better reflect the status and progress of the eligible green projects as of the reporting date.</p> <p>The Framework further states that the Entity might seek to complement the aforementioned indicators with relevant case studies, depending on availability of information and subject to confidentiality obligations, and may appoint specialized consultants to develop methodologies for the estimation and calculation of the impacts that are to be made publicly available.</p>

	Where possible and relevant, the issuer may use quantitative metrics on any identified social co-benefits (e.g., number of employees from decommissioned facilities currently employed by company/externally in X year).		
Indicator Methodology	<p>Description of the key underlying methodology and/or assumptions used in the quantitative determination.</p> <p>To facilitate comparison of project results, it is suggested that issuers aim to report on at least a limited number of sector specific core indicators for projects included in their green bond programmes.</p>	Recommendation	<p>The Framework states that the Entity intends to align the Allocation and Impact Report's methodology with the approach described in the "Handbook – Harmonized Framework for Impact Reporting" of June 2024.</p>
Estimated lifetime results	<p>It could also be beneficial to report the estimated lifetime results and/or project economic life (in years) to provide users with a basis for understanding the impact of the project over its lifetime.</p>	Recommendation	<p>The Framework states that eligible projects will lead to the replacement of fossil fuels with alternative fuels and renewable-based green hydrogen, the reduction of SOx and other gaseous emissions, the improvement of compliance with BAT-AEL emission limits, the improvement of energy efficiency, the promotion of industrial symbiosis, the reduction of the clinker factor and embodied CO₂, the extension of the lifecycle of cement-based materials, the increase in system-wide energy recovery, and the enabling of the substitution of high-moisture AFs with biogenic alternatives.</p> <p>The Framework further states that the impacts and environmental benefits of the eligible green projects may arise throughout their operational lifetime.</p>
Further information	<p>In this section you have the opportunity to provide further information, e.g. based on national regulations, data and/or certain KPI's, with regard to the SDGs or other information which could be useful for investors.</p> <p>For increased transparency, where possible and relevant, the issuer may consider reporting for green eligible project categories, the impact on workforce and communities, and other non-environmental benefits.</p>	Recommendation	<p>The Framework states that the Entity will report impact indicators in its Annual and Impact Report that best reflect the status and progress of the eligible green projects as of the reporting date. The Framework further states that the Entity intends to align the Allocation and Impact Report with the approach described in the "Handbook – Harmonized Framework for Impact Reporting" of June 2024.</p>

ENGAGING EXTERNAL REVIEW PROVIDERS			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Appointment	The GBP recommend that in connection with the issuance of a green bond or a green bond programme, issuers appoint (an) external review provider(s) to assess through pre-issuance external review the alignment of their green bond or green bond programme and/or Framework with the four components of the GBP.	Recommendation	<p>The Framework states that the Entity has appointed KPMG to provide independent limited assurance on the alignment of the Framework with the four core principles of ICMA's Green Bond Principles of June 2025 and with the four core principles of LMA's Green Loan Principles of March 2025.</p> <p>The Framework further states that the independent limited assurance report and the green finance framework may be made available on the Entity's website at www.secil-group.com.</p>
Type of external review	<input checked="" type="checkbox"/> Second Party Opinion <input type="checkbox"/> Verification <input type="checkbox"/> Certification <input type="checkbox"/> Scoring/Rating	Core	<p>The Framework states that through this Framework the Entity intends to align the Entity's funding with the Entity's sustainability roadmap, and expand access to a broader investor community, strengthen relationships with responsible investors, and actively contribute to the development of the green finance market. The Framework states that both the Framework and the annual Allocation and Impact Reports will be the target of independent limited assurance work.</p>
Public disclosure of the reports or templates	The GBP recommend public disclosure of external reviews (on the bond issuer's website and/or through any other accessible communication channel as appropriate before or at the time of the issuance) as well as using the template for performed external reviews.	Recommendation	<p>The Framework states that the independent limited assurance report and the green financing framework may be made available on the Entity's website at www.secil-group.com.</p> <p>The Framework further states that the annual Allocation and Impact Report and the corresponding independent limited assurance report may also be made publicly available on the Entity's corporate website at www.secil-group.com.</p>

External verification of reporting	Indicate if external review will be provided to verify the internal tracking and the allocation of proceeds.	Recommendation	The Framework states that an independent external party, appointed by the Entity, will provide an annual independent limited assurance report on the Entity's Allocation and Impact Report until full allocation of proceeds from the green finance instruments. As stated in the Framework, this review will cover the internal tracking method, the allocation of proceeds to eligible green projects, the remaining balance of unallocated proceeds, and the compliance of allocated resources with the eligible categories defined in this Framework.

Appendix III - Green Loans Principles issued by the Loan Market Association (“LMA”) in March 2025

Findings and observations related to particular aspects of the engagement

We provide a summary of our findings and observations in alignment with LMA's GLP for the core components, to provide the reader with further understanding on how the Green Finance Framework meets the Criteria. These observations are not intended to detract from our conclusion provided above.

STRATEGY AND RATIONALE			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Rationale for Green Loan issuance	Description of the reasoning for issuing a Green Loan.	Recommendation	<p>The Framework states that sustainability is a core element of Secil's long-term strategy and is fundamental to the Entity's ambition of contributing to the decarbonisation of the construction value chain. The Framework states that the Entity seeks to reduce the environmental footprint associated with its operations and products and to support the transition towards a low-carbon and circular economy.</p> <p>The Framework states that the Entity believes that green finance instruments are effective tools to channel investments into projects with tangible climate and environmental benefits. According to the Framework, the Entity intends to align its funding with its sustainability roadmap and to expand access to a broader investor community, strengthen relationships with responsible investors, and actively contribute to the development of the green finance market. In doing so, as the Framework states, the Entity ensures the projects contribute to the achievement of the United Nations' Sustainable Development Goals (UN's SDGs).</p> <p>The Framework further states that it is intended to be used to execute financings, which may include, but are not limited to, debt securities, including green bonds, loans and/or commercial paper programmes,</p>

			whose proceeds will be used exclusively to finance and/or refinance, in part or in full, new and/or existing eligible green assets.
Sustainability strategy – issuer	<p>It is recommended that issuers summarise in their Green Finance framework relevant information to provide the context of the issuer's overarching objectives, strategy, policy and/or processes relating to sustainability.</p> <p>Environmental Sustainability Strategy:</p> <p>This may include reference to the five high level environmental objectives of the GLP (climate change mitigation, climate change adaptation, natural resource conservation, biodiversity conservation, and pollution prevention and control).</p> <p><i>For example, if the Green Loan's use of proceeds is invested in clean energy projects, the issuer should provide the rationale for how those projects will support the issuer's decarbonisation efforts. If possible, provide a quantification of the green projects' contribution towards the realisation of the relevant environmental strategy and decarbonisation targets – Greenhouse Gases (GHG) reduced/avoided and/or renewable capacity installed.</i></p> <p>It is recommended that issuers with a published decarbonisation trajectory also include reference to relevant external, industry or sector benchmarks (e.g., SBTi) and to provide disclosures aligned to each of the four elements of the CTFH in order to credibly articulate how the identified use of proceeds fits into the achievement of the overall strategy.</p> <p>Transition may have positive or negative impacts for workers, communities, and surrounding environments. Therefore, where relevant, issuers are encouraged to outline how they have incorporated consideration of a “just transition” into their climate transition strategy and may also detail any social expenditures that are considered relevant.</p> <p>Common question(s) from the pre-issuance external reviewers: <i>Is the activity integrated into the issuer's business model?</i></p>	Recommendation	<p>According to the Framework, the Entity is committed to sustainability and seeks to reconcile its economic performance with respect for the environment and responsible citizenship. The Entity states in its Framework that the response to global climate change involves the reduction of the carbon intensity of production, and the promotion of biodiversity and a circular economy, which the Framework states the Entity has accepted as challenges that will be overcome with continued creation of economic value. As such, and according to the Framework, the Entity has designed a strategy that is upheld by an empowered and autonomous internal team. Secil's strategy aims to:</p> <ul style="list-style-type: none"> – Achieve carbon neutrality in the cement and concrete value chains by 2050, – Contribute to a circular economy through the co-processing of alternative fuels and raw materials, – Promote a health and safety culture that will allow for the reduction of work-related accidents and eliminate fatalities, – Support equal opportunities and promote diversity in management decisions, – Develop strong synergies with local communities, with the aim to give back to the Entity's neighbours and stakeholders, – Focus on the customer to provide them with exceptional customer experience, and – Do all the above while respecting human and labour rights with ethics, integrity and corporate responsibility. <p>The Framework states that the Entity takes part in international institutions and partnerships with the additional aim of having a clear, transparent governance model that allows the Entity to anticipate risks and opportunities. As stated in the Framework, the Entity's Sustainability Policy (https://www.secil-group.com/en/sustainability/sustainability-at-secil/sustainability-policy) defines objectives and prioritizes actions that contribute, according to</p>

<p><i>(For example, what proportion of the issuer's income and/or investments are linked to such activities? How has it been changing over the last few years? What are relevant short-term, medium-term and long-term targets?)</i></p>		<p>the Framework, to a better life on a planet that supports all of humanity. In alignment with its policy, the Entity has, according to the Framework, developed an internal framework to achieve its strategy named ESG+E, which covers the Environmental, Social, Governance and Economic pillars and is based on the Entity's material topics:</p> <ul style="list-style-type: none"> – Environmental (E): carbon neutrality; air emissions; circular economy; resources & energy efficiency; biodiversity; water. – Social (S): health & safety; stakeholder engagement; social responsibility; equity, diversity & inclusion; human & labour rights. – Governance (G): corporate governance; organization strategy; ethics, integrity & compliance; sustainability management; reporting. – Economic (E): sustainable economic growth; sustainable finance; sustainable procurement; customer centricity. <p>According to the Framework, the Entity is a member of the Global Cement and Concrete Association (GCCA), which has issued a charter of ten commitments for the sector to contribute to the achievement of the SDGs. As stated in the Framework, the Entity has subscribed these ten commitments, which it intends to meet in the 2020-2030 horizon, with well-defined indicators and targets. Additionally, according to the Framework, the Entity has committed to the promotion of a more sustainable development model with the signing of the Manifesto promoted by the Business Council for Sustainable Development (BCSD) Portugal.</p> <p>The Framework states that the Entity has defined a roadmap for decarbonisation called <i>Secil's Path to Decarbonisation</i> and based on the Cembureau 5C's methodology. According to the Framework, the roadmap lays out the Entity's path toward the decarbonisation of its cement plants, with intermediate targets established for 2030 and carbon neutrality by 2050. The 2030 targets, as stated in the Framework, are aligned with the 1.5 °C trajectory in line with the goals of the Paris Agreement, having been validated in 2024 by the Science Based Targets initiative (SBTi). The Framework states that</p>
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		<p>the roadmap is supported by the implementation of a set of actions underpinned by internal investment plans extending through 2050 and ensures a fair transition by supporting workers, suppliers, and local communities, where applicable, throughout the decarbonization process. To ensure a fair transition in alignment with the recommendations of the Climate Transition Finance Handbook 2025, the Entity, according to the Framework, promotes continuous training and upskilling initiatives to prepare its workforce for the technological transformation of cement production and engages with local stakeholders through environmental monitoring committees and community development projects designed to foster inclusion and minimize potential negative social impacts arising from the transition to a low-carbon economy.</p> <p>The Framework states that reductions in the Entity's Scope 1 Greenhouse Gas (GHG) emissions will be achieved through the modernization of facilities with more efficient and proven technologies, which will reduce heat consumption and increase the rate of use of alternative fuels with CO₂-neutral content with the support of green hydrogen, decarbonated raw materials in clinker production, and alternative raw materials with pozzolanic properties in cement production. According to the Framework, the Clean Cement Line (CCL) project was the first major decarbonization carried out by the Entity and occurred in its Outão plant in Portugal. As stated in the Framework, the Profuture project, currently underway in the Maceira-Liz plant in Portugal is the second major project aligned with the Entity's decarbonization strategy and has as its main objective the elimination of fossil fuel usage in the plant and the increase in the plant's energy efficiency, thereby reducing GHG emissions and reinforcing the Entity's commitment to innovation and sustainability.</p> <p>According to the Framework, the Entity will assess available and emerging technologies to select those best suited to be incorporated in its plants between 2030 and 2050. The Framework indicates that one of the options currently under evaluation is the use of captured CO₂ either through the forced carbonation of the Entity's materials or</p>
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		<p>to produce synthetic fuels (e-fuels) and the Entity is currently identifying the infrastructure required to use or store this CO₂ safely. By 2040, as stated in the Framework, the Entity plans to invest over 150 million Euros in a variety of decarbonization projects that focus on traditional levers such as alternative fuels and secondary raw materials, low-carbon clinkers, reduction of the clinker factor, and thermal energy efficiency measures.</p> <p>The Framework further states that the process of identifying and managing environmental and social risks at the Entity is carried out through the Double Materiality assessment in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the EFRAG guidelines, with mitigation measures established over the assessed negative impacts.</p> <p>The Framework states that the Entity is not excluded from the EU Paris Agreement-aligned benchmark indicators and states that the Entity's economic activities are covered by the EU Taxonomy Regulation. As stated in the Framework, the Entity expects to achieve 86% alignment by 2030 which, as stated reinforces the Entity's transition towards a sustainable economy. Additionally, the Framework states that the stated sustainability commitments allow the Entity to align and consolidate its internal objectives, integrate the perspectives of all stakeholders, position the Entity alongside its peers and contribute to the achievement of the UN SDGs.</p> <p>As stated in the Framework, the Entity closely monitors the challenges of sustainable development and, as such, the UN's SDGs are included in the Entity's agenda and are periodically reviewed and confirmed. The Framework states that the Entity has established three levels of SDGs:</p> <ul style="list-style-type: none"> – Level 1: Strategic – Level 2: Relevant – Level 3: Support <p>According to the Framework, the SDG are mapped as follows:</p>
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		<ul style="list-style-type: none"> – Level 1: SDG 9 (Industry, Innovation and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action), – Level 2: SDG 3 (Good Health and Wellbeing), SDG 8 (Decent Work and Economic Growth), and SDG 11 (Sustainable Cities and Communities), and – Level 3: SDG 17 (Partnerships for the Goals). <p>The Framework states that the ESG+E strategy will ensure the Entity's key contributions to achieve the SDGs in the following way:</p> <ul style="list-style-type: none"> – Environmental (E): Help reduce the impacts of climate change; help drive decarbonization; optimize energy consumption and use of alternative energy sources, including renewables; promote a circular economy and efficient use of natural resources; value and protection of biodiversity; develop RDI projects and establish partnerships to offer solutions with an impact on the construction value chain. – Social (S): build close relationships and stakeholder engagement; support the local community in the countries the Entity operates; provide decent work, training, and support for the career advancement of the Entity's employees, fostering health, safety, and wellbeing; uphold diversity, equity, inclusion, and non-discrimination in human rights internally and externally. – Governance (G): clearly define and monitor goals for the commitments included in the Strategy Plan – Ambition 2025 – Sustainable Growth; governance model supported by rules of ethics and conduct, integrity, transparency, and accountability; build a risk management model based on risk identification, mitigation measures, oversight, and evaluation. – Economic (E): drive economic growth and generate employment and wealth in the regions where the Entity operates; create decent work by protecting labour rights; drive innovation and develop new products and projects with a focus on quality and safety; build sustainability in the Entity's value chain and foster trusting relationships with customers and suppliers.
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			Finally, the Framework states that the Entity initiated, in 2024, a process to identify climate-related risks and opportunities in line with the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) with the objective of assessing potential physical and transition risks related to climate change and developing appropriate climate change adaptation strategies.
Sustainability governance – issuer	<p>Explain the issuer's governance and responsibilities around sustainability.</p> <p>Examples of items that can be included are:</p> <ul style="list-style-type: none"> • Description of the board's oversight and role in assessing and managing of climate-related risks and opportunities; • Board and management composition: board size, % of independent members, rotation, diversity (gender, age, ethnicity, geography), competence, qualifications; • Engagement: ability of the board to ensure the interest of shareholders, as well as the active role they play in setting the vision and sustainability strategy; • Sustainability strategy and associated performance targets: sustainability-related targets, processes, monitoring systems, formalised action plan and incentives mechanism (remuneration); • Sustainability-related policies: sustainability-related policies and operational guidelines, implemented by trainings, audits, etc.; • Social safeguards: human rights, labour rights, anti-corruption, anti-bribery; • Sustainability reporting. <p>Common question(s) from the Pre-Issuance External Reviewers:</p> <p><i>How does the company's strategy ensure that all activities are aligned with both social and green priorities?</i></p>	Recommendation	<p>The Framework states that the Entity is led by a two-tier Board of Directors with 4 executive and 4 non-executive directors, where the Chief Executive Officer (CEO) is charged with the promotion of sustainability topics within the business, as well as with the approval of related strategic objectives, strategic initiatives, and priority actions. According to the Framework, there is an Executive Director responsible for environmental and climate-related issues and, since 2025, an Executive Director responsible for social issues.</p> <p>The Framework states that in 2021, when the Entity's strategic plan was defined, one of its defined seven elements was Sustainability, over which the project ESG+E was created. According to the Framework, the Entity's Sustainability Department was created in 2023 and the ESG+E project was incorporated into its responsibilities, where the Sustainability Manager coordinates all topics under the Sustainability Framework with the support of the responsible persons of each of the ESG+E pillars and all managers involved in the Sustainability Committee. According to the Framework, the said Sustainability Committee, which was created in 2018, has had its reach extended to all business areas and all geographies and is composed of all elements involved in the various Sustainability topics within the Entity.</p> <p>Regarding the <i>Responsible Business Conduct</i> topic, the Framework states that the principles of ethics, compliance and respect for human rights are integrated into the Entity's Governance model and are</p>

		<p>extended to all geographies where the Entity operates. Additionally, the Framework states that the Entity's Code of Conduct mirrors the Entity's responsible conduct and, in 2024, the Entity developed an additional group of policies to increase the robustness and clarity of the principles of ethics and compliance across its operations (Corruption Prevention Policy; Policy on the Prevention of Money Laundering and Terrorist Financing; Fair Competition Policy; Stakeholder Engagement Policy; Human and Labour Rights Policy).</p> <p>Regarding the <i>Involvement with stakeholders</i>, the Framework states that stakeholders are a key part of the way in which the Entity manages its business model. As stated in the Framework, the Entity has been promoting the opening of channels that make it possible for different actors that are impacted by the Entity's operations to be heard and be involved in the Entity's decision-making process. As such, and according to the Framework, in 2024 the Entity developed a Stakeholder Engagement Policy and put in place a Stakeholder Engagement Program whose objectives were to:</p> <ul style="list-style-type: none"> – Strengthen dialogue with stakeholders, enhancing the creation of partnerships and promoting the exchange of experiences, resources, knowledge, skills, and efforts, – Integrate stakeholder expectations, – Promote the intervention and continuous identification of possible impacts on the communities surrounding the areas where the Entity carries out its activities, – Enrich surrounding communities through job creation, local hiring, and community involvement, – Contribute to the improvement of the well-being of populations and promote initiatives to support the development of communities and places where the Entity is located, – Refrain from any undue interference in local political activity, – Allow the access of relevant corporate information and development of the Entity's activity by stakeholders, – Include relevant contributions identified by stakeholders in the Entity's strategy, and
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			<ul style="list-style-type: none"> – Encourage the reporting of operations suspected of breaching the standards and good practices set out in the policy through the usual reporting procedures or, alternatively, through the Secil Group Integrity Channel.
Supporting regulations, standards, or framework for sustainability-related disclosure and reporting – issuer	<p>Issuers are encouraged to create disclosures regarding issuer strategies and their alignment with recognised initiatives, standards and/or reporting frameworks which are numerous and issued by multiple regional entities. These may include:</p> <ul style="list-style-type: none"> • Supporting regulation such as: EU Non-Financial Reporting Directive (NFRD) – EU Corporate Sustainability Reporting Directive (CSRD) - EU Sustainable Finance Disclosure Regulation (SFDR). • Climate reporting standards and carbon pathway methodologies such as: TCFD, SBTi, PRI, TPI. • ESG reporting such as: GRI, SASB, CDP. 	Recommendation	<p>The Framework states that it is aligned with the four core components of the Green Bond Principles issued by the International Capital Market Association in June 2025 and with the four core components of the Green Loan Principles issued by the Loan Market Association in March 2025.</p> <p>The Framework further states that the process to identify and manage social and environmental risks was carried out through the Double Materiality assessment in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the EFRAG guidelines and that the Entity has begun the process to identify climate-related risks and opportunities in line with the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD).</p>

GLP COMPONENT 1: USE OF PROCEEDS			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Green projects	<p>A description of the issuer's selected green projects should be appropriately described in the Green Finance framework or in the legal documentation of the security. All designated green projects should provide clear environmental benefits, which will be assessed and, where feasible, quantified by the issuer. Issuers are encouraged to provide further details on the project category, such as type of technology being considered.</p> <p>Common question(s) from the pre-issuance external reviewers:</p> <p><i>Does the activity/project provide clear environmental benefits that can be monitored, quantified and are attributable (at least indirectly) to the activity/project?</i></p>	Core	<p>The Framework states that the Green Finance Framework was established to execute financings, which may include, but are not limited to, debt securities, including green bonds, loans and/or commercial paper programmes, whose proceeds will be used exclusively to finance and/or refinance, in part or in full, new and/or existing eligible green assets.</p> <p>The Framework states that eligible green assets will fall within six main environmental objectives or groups of objectives: (1) Pollution prevention and control, (2) Energy efficiency, (3) Renewable energy, (4) Circular economy adapted products, production technologies and processes, (5) Circular economy / energy efficiency, and (6) Sustainable water and wastewater management.</p> <p>In terms of the eligible category (1) Pollution prevention and control, the Framework states that the Entity's eligible assets are projects that prevent, reduce, or control emissions of air pollutants or GHGs and other environmental impacts across the Entity's operations, which may include the use of low-carbon fuels and raw materials, technologies to reduce air pollutants such as SO_x, NO_x and particulate matter, improvements in emissions monitoring systems, water treatment and waste management measures. As stated in the Framework, these projects would be consistent with the Entity's publicly disclosed climate commitments, validated by the SBTi, including the reduction of Scope 1 and Scope 2 GHG emissions by 30.4% per tonne of cement by 2030 compared to a 2020 baseline (equivalent to a reduction from 781 kgCO₂e/t cement in 2020 to 544 kgCO₂e/t cement in 2030). According to the Framework, an eligible project would be the Profuture project in the Maceira plant, which includes the modernization of Line 6 with advanced low-carbon</p>

		<p>technologies, including alternative fuels and green hydrogen integration.</p> <p>In terms of the eligible category (2) Energy efficiency, the Framework states that the Entity's eligible assets are projects of implementation of technologies and measures aligned with Best Available Technologies (BAT) and other innovations that aim to improve efficiency and reduce thermal and electrical energy consumption across clinker productions and other operations. According to the Framework, an eligible project would be the digitalization of kiln operations and advanced monitoring systems installed at the Entity's plants.</p> <p>In terms of the eligible category (3) Renewable energy, the Framework states that the Entity's eligible assets are projects that integrate renewable and low-carbon energy sources into the Entity's operations, which may include the use of renewable electricity, green hydrogen or other biogenic fuels, as well as recovery and reuse of residual energy flows. According to the Framework, eligible projects would be the increase in the use of alternative fuels through the installation of a dryer and enabling the use of more biogenic fuel streams and the pilot integration of green hydrogen in clinker production in the Profuture Project.</p> <p>In terms of the eligible category (4) Circular economy adapted products, production technologies and processes, the Framework states that the Entity's eligible assets are projects that promote circular economy and resource efficiency across the Entity's operation, which may include adapted production technologies and processes that enable the substitution of virgin raw materials with secondary or recycled inputs, the use of supplementary cementitious materials (e.g., pozzolanic or other suitable materials), the incorporation of industrial by-products, the development of low-carbon cement and concrete, and the valorisation of constructed and demolition waste. According to the Framework, eligible projects would be the increased use of pozzolanic and silico-aluminous materials as</p>
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		<p>clinkers substitutes, the expansion of alternative fuels co-processing, and the development and industrial deployment of calcined clays for clinker substitution at the Pataias plant.</p> <p>In terms of the eligible category (5) Circular economy / energy efficiency, the Framework states that the Entity's eligible assets are projects that improve resource and energy efficiency through the recovery and reuse of residual energy and materials, which may include waste heat recovery for internal process use, the preparation and drying of alternative fuels and raw materials, or other technologies that enable more efficient use of resources across the Entity's operations. According to the Framework, eligible projects would include the integration of recovered process heat to enable the use of alternative fuels and the thermal activation of supplementary cementitious materials (SCMs), supporting clinker substitution and improved energy efficiency.</p> <p>In terms of the eligible category (6) Sustainable water and wastewater management, the Framework states that the Entity's eligible assets are projects that enhance water efficiency and sustainable water use across the Entity's cement, concrete, and aggregates operations, which may include initiatives to reduce freshwater consumption in industrial processes, optimise water recycling and reuse, and improvement water management systems. According to the Framework expenditures associated with this eligible category may also cover the development, upgrading, or installation of technologies to improve wastewater treatment and effluent quality, the deployment of efficient water-related equipment, and investments in systems for wastewater recycling, recovery and safe discharge. According to the Framework, eligible projects would include the implementation of water-efficient technologies and reuse/recycling systems and the improvement of water management systems.</p>
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<p>Environmental benefits</p>	<p>Taking into account the local context and business activity of the issuer, will the intended activity/project/asset provide and/or ensure a short- or long-term environmental improvement?</p> <p>Common question(s) from the pre-issuance external reviewers:</p> <p><i>Can the issuer demonstrate that the project/activity/asset will provide clear and relevant environmental improvements (based on evidence, research, international standards, etc.)?</i></p>	<p>Core</p>	<p>In terms of the eligible category (1) Pollution prevention and control, the Framework states that the expected environmental benefits include the replacement of fossil fuels with alternative fuels, the reduction of SOx and other gaseous emissions, and the improvement of compliance with BAT-AEL emission limits. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the sustainable use and protection of water and marine resources, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Improving water management and efficiency, including by protecting and enhancing the status of aquatic ecosystems, by promoting the sustainable use of water through the long-term protection of available water resources, <i>inter alia</i>, through measures such as water reuse, by ensuring the progressive reduction of pollutant emissions into surface water and groundwater, by contributing to mitigating the effects of floods and droughts, or through any other activity that protects or improves the qualitative and quantitative status of water bodies. <p>Additionally, according to the Framework, projects in this eligible category also have as a goal to contribute substantially to pollution prevention and control, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Preventing or, where that is not practicable, reducing pollutant emissions into air, water or land, other than greenhouse gases, and – Improving levels of air, water or soil quality in the areas in which the economic activity takes place whilst minimizing any adverse impact on human health and the environment or the risk thereof. <p>In terms of the eligible category (2) Energy efficiency, the Framework states that the expected environmental benefits include the improvement of energy efficiency within the Entity's operations. These environmental benefits have, as a final goal, to contribute</p>
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		<p>towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to climate change mitigation, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Improving energy efficiency, except for power generation activities as referred to in Article 19(3) of the EU Taxonomy Regulation. <p>In terms of the eligible category (3) Renewable energy, the Framework states that the expected environmental benefits include the replacement of fossil fuels with renewable-based green hydrogen and the enabling of full decarbonization of thermal energy supply. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to climate change mitigation, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Generating, transmitting, storing, distributing or using renewable energy in line with Directive (EU) 2018/2001, including through innovative technology with a potential for significant future savings or through necessary reinforcement or extension of the grid. <p>Additionally, according to the Framework, projects in this eligible category also have as a goal to contribute substantially to the transition to a circular economy, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Using natural resources, including sustainably sourced bio-based and other raw materials, in production more efficiently, including by (i) reducing the use of primary raw materials or increasing the use of by-products and secondary raw materials, or (ii) resource and energy efficiency measures. <p>In terms of category (4) Circular economy adapted products, production technologies and processes, the Framework states that the expected environmental benefits include the promotion of industrial symbiosis, the reduction of the clinker factors and embodied</p>
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		<p>CO₂, and the extension of the lifecycle of cement-based materials. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the transition to a circular economy, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Using natural resources, including sustainably sourced bio-based and other raw materials, in production more efficiently, – Prolonging the use of products, including through reuse, design for longevity, repurposing, disassembly, remanufacturing, upgrades, and repair, and sharing products, and – Preventing or reducing waste generation, including the generation of waste from the extraction of minerals and waste from the construction and demolition of buildings. <p>In terms of category (5) Circular economy / energy efficiency, the Framework states that the expected environmental benefits include the increase in system-wide energy recovery and the enabling of the substitution of high-moisture AFs with biogenic alternatives. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the transition to a circular economy, especially with regards to but not limited to:</p> <ul style="list-style-type: none"> – Using natural resources, including sustainably sourced bio-based and other raw materials, in production more efficiently, – Preventing or reducing waste generation, including the generation of waste from the extraction of minerals and waste from the construction and demolition of buildings, and – Prolonging the use of products, including through reuse, design for longevity, repurposing, disassembly, remanufacturing, upgrades and repair, and sharing products. <p>In terms of category (6) Sustainable water and wastewater management, the Framework states that the expected environmental</p>
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			<p>benefits include the continuous reduction in freshwater consumption across operations and an insurance that all wastewater is treated before discharge. These environmental benefits have, as a final goal, to contribute towards the EU Environmental Objectives present in the EU Taxonomy Regulation. According to the Framework, projects in this eligible category have as a goal to contribute substantially to the sustainable use and protection of water and marine resources, especially with regards to but limited to:</p> <ul style="list-style-type: none"> – Protecting the environment from the adverse effects of urban and industrial wastewater discharges, including from contaminants of emerging concern such as pharmaceuticals and microplastics, for example by ensuring the adequate collection, treatment and discharge of urban and industrial wastewaters, – Protecting human health from the adverse impact of any contamination of water intended for human consumption by ensuring that it is free from any microorganisms, parasites and substances that constitute a potential danger to human health as well as increasing people's access to clean drinking water, and – Improving water management and efficiency, including by protecting and enhancing the status of aquatic ecosystems, by promoting the sustainable use of water through the long-term protection of available water resources, <i>inter alia</i>, through measures such as water reuse, by ensuring the progressive reduction of pollutant emissions into surface water and groundwater, by contributing to mitigating the effects of floods and droughts, or through any other activity that protects or improves the qualitative and quantitative status of water bodies.
Multiple projects	<p>Description of the estimated proceeds allocation per green project category.</p> <p>If unknown at time of issuance, please indicate when this will be determined.</p>	Core	<p>The Framework indicates that the eligible green projects may fall into one or more of each of the six identified eligible categories. These are: (1) Pollution prevention and control, (2) Energy efficiency, (3) Renewable energy, (4) Circular economy adapted products,</p>

			<p>production technologies and processes, (5) Circular economy / energy efficiency, and (6) Sustainable water and wastewater management.</p> <p>According to the Framework, the eligible green projects may include capital expenditures, operating expenditures related to implementation, and research and development (R&D) expenditures, and may be carried out by the Entity or its subsidiaries in Portugal, provided they meet the eligibility criteria.</p> <p>The Framework further states that the Entity will allocate proceeds to eligible green projects selected in accordance with the eligibility criteria within up to 36 months of issuance of the green finance instruments. It states, however, that at the time of publication of the Framework, the Entity cannot estimate the amounts that will be financed or refinanced.</p>
Refinancing	<p>Description of the estimated share of financing vs. re-financing, and where appropriate, also clarify which investments or project portfolios may be refinanced, and, to the extent relevant, the expected look-back period for the refinanced green projects.</p> <p>If unknown at time of issuance, please indicate when this will be determined.</p> <p>Please note that:</p> <ul style="list-style-type: none"> • Green projects qualify for refinancing as long as they are in use, follow the relevant eligibility criteria at the time of issuance and are still assessed as making a meaningful impact. • Different lookback periods may apply for Capex, Opex and assets. 	Recommendation	<p>The Framework states that the Entity will allocate proceeds to eligible green projects selected in accordance with the eligibility criteria within up to 36 months of issuance of the green finance instruments. It states, however, that at the time of publication of the Framework, the Entity cannot estimate the amounts that will be financed or refinanced, while adding that such information will be reflected in the Allocation and Impact Report.</p>

GLP COMPONENT 2: PROCESS FOR PROJECT EVALUATION & SELECTION			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Evaluation and selection of green projects	<p>Description of the governance process by which the green projects are evaluated and selected including:</p> <ul style="list-style-type: none"> details on who will be part of the process to select eligible projects for allocation; the alignment with the Use of Proceeds Categories (qualitative and quantitative inclusion criteria and, if applicable, exclusion criteria); and the alignment with official or market-based taxonomies, (e.g., qualitative and quantitative criteria and if applicable, exclusion criteria). <p>Issuers should also clearly communicate the environmental sustainability objectives of the green projects and should describe how the selected projects fit within the issuer's wider sustainability strategy, goals and objectives.</p>	Core Recommendation Core	<p>The Framework states that the Entity established a structured decision-making process to determine the eligibility of green projects in accordance with the eligibility criteria set out in the Use of Proceeds chapter.</p> <p>The Framework states that the selection of the eligible green projects was carried out by the Entity's Executive Committee, based on prior assessments and recommendations from the Finance, Sustainability, Technical, and other relevant business teams, as deemed necessary, in line with the eligibility criteria defined in the Framework.</p> <p>The Framework stats that the allocation of proceeds, whether for financing or refinancing eligible green projects, is set to be authorized by the Entity's Chief Financial Officer (CFO), following the project's selection by the Executive Committee, who ensures and guarantees that the allocation of funds complies with the principles and requirements established in the Framework.</p>
Associated risks	<p>Description of the process applied to identify and manage perceived/known social and environmental risks associated with the relevant projects.</p> <p>It is recommended that issuers have a process in place to identify mitigants to key social and/or environmental risks associated with the eligible project(s). Such mitigants may include clear and relevant trade-off analysis undertaken and monitoring required where the issuer assesses the potential risks to be meaningful.</p>	Core	<p>The Framework states that the process of identifying and managing social and environmental risks at Entity level is carried out through the Double Materiality assessment, in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the EFRAG guidelines. As further stated, the necessary mitigation measures are established based on the negative impacts assessed.</p> <p>The Framework further states that the Entity promotes continuous training and upskilling initiatives to prepare its workforce for the technological transformation of cement production. As stated in the Framework, the Entity additionally engages with local stakeholders</p>

	<p>Where relevant, issuers may seek to highlight how their green or transition projects may incorporate elements of a “just transition” either through risk reduction or social co-benefits.</p> <p>Common question(s) from the pre-issuance external reviewers:</p> <ul style="list-style-type: none"> • <i>Would the considered use of proceeds have a significant negative impact on the other environmental objectives, or on other vulnerable groups or social areas?</i> • <i>What measures can be implemented to avoid or at least minimise the negative impact of the activity/project?</i> • <i>Is the commitment to identify and manage potentially material social and/or environmental risks, as well as international conventions and recommendations or local labour laws formalised and detailed in the framework?</i> 	Recommendation	<p>through environmental monitoring committees and community development projects designed to foster inclusion and minimize potential negative social impacts arising from the transition to a low-carbon economy. The Framework states that these actions underpin a fair and inclusive transition, consistent with the recommendations of the Climate Transition Finance Handbook 2025.</p> <p>The Framework states that to ensure that the assets financed and/or refinanced under the Framework are evaluated and selected based on compliance with the eligibility criteria, the Entity complies with applicable national, European, and international environmental and social standards and regulations, including the United Nations Principles for Humans Rights and the International Labour Organisation’s core labour conventions, to ensure stringent management of potential negative environmental and social impacts associated with the eligible green assets. As stated in the Framework, the Entity has signed the CEO Guide for Human Rights of the World Business Council for Sustainable Development (WBCSD).</p>
Official or market-based taxonomies, green standards or certifications referenced	<p>Issuers are also encouraged to identify alignment of their Green Finance framework and their green projects with official or market-wide taxonomies and to reference any green standards or certifications used which may include: GLP, EU taxonomy for Sustainable Activities, ISO 14030, Climate Transition Finance Handbook (CTFH) etc. if applicable.</p> <p>It is also recommended to provide information, if relevant and applicable, on exclusion criteria used.</p>	Recommendation	<p>The Framework states that it is aligned with the four core components of the International Capital Markets Association’s (ICMA) Green Bond Principles (GBP) of June 2025 and with the four core components of the Loan Market Association’s (LMA) Green Loan Principles (GLP) of March 2025.</p> <p>The Framework further stated that the Entity has developed continuous actions for its workforce and in engagement with local stakeholders that underpin a fair and inclusive transition, consistent with the recommendations of the Climate Transition Finance Handbook 2025.</p> <p>The Framework states that the Entity is not excluded from the EU Paris Agreement-aligned benchmark indicators and the Entity’s</p>

			<p>economic activities are covered by the EU's Taxonomy Regulation. Additionally, the Framework states that, in defining and assessing Eligible Green Projects, the Entity also considers the EU Taxonomy as a key reference framework and is committed to progressively align its investments with its objectives, including the technical screening the criteria, the DNSH (Do No Significant Harm) requirements and the Minimum Safeguards.</p> <p>The Framework states that to ensure that the assets financed and/or refinanced under the Framework are evaluated and selected based on compliance with the eligibility criteria, the Entity complies with applicable national, European, and international environmental and social standards and regulations, including the United Nations Principles for Humans Rights and the International Labour Organisation's core labour conventions, to ensure stringent management of potential negative environmental and social impacts associated with the eligible green assets. As stated in the Framework, the Entity has signed the CEO Guide for Human Rights of the World Business Council for Sustainable Development (WBCSD).</p>
SDGs alignment	<p>Issuers are also encouraged to identify alignment with market-wide green, social or development objectives, such as the Sustainable Development Goals (SDGs), to help investors that may use them as part of their investment decisions. Issuers can indicate alignment:</p> <ol style="list-style-type: none"> 1) At a company level (if applicable) 2) In respect of the green categories and/or projects to be funded by Green Loans <p>It is recommended that issuers include in their Green Finance framework their methodology for alignment with the SDGs, and where applicable, incorporate this in their external review process. Issuers should provide as much clarity and detail as feasible on how specific SDGs are relevant to the issuance and not simply reference the SDGs in general.</p>	Recommendation	<p>The Framework states that the Entity's sustainability commitments allow the Entity to align and consolidate its internal objectives, integrate the perspectives of all stakeholders, position the Entity alongside its peers and contribute to the achievement of the UN's SDGs. As stated in the Framework, the Entity closely monitors the challenges of sustainable development and, as such, the UN's SDGs are included in the Entity's agenda and are periodically reviewed and confirmed. The Framework states that the Entity has established three levels of SDGs:</p> <ul style="list-style-type: none"> – Level 1: Strategic – Level 2: Relevant – Level 3: Support <p>According to the Framework, the SDG are mapped as follows:</p>

		<ul style="list-style-type: none"> – Level 1: SDG 9 (Industry, Innovation and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action), – Level 2: SDG 3 (Good Health and Wellbeing), SDG 8 (Decent Work and Economic Growth), and SDG 11 (Sustainable Cities and Communities), and – Level 3: SDG 17 (Partnerships for the Goals). <p>In terms of category (1) Pollution prevention and control, the Framework states that eligible green assets will be aligned with SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action).</p> <p>In terms of category (2) Energy efficiency, the Framework states that eligible green assets will be aligned with SDG 9 (Industry, Innovation, and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p> <p>In terms of category (3) Renewable energy, the Framework states that eligible green assets will be aligned with SDG 7 (Affordable and Clean Energy), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p> <p>In terms of category (4) Circular economy adapted products, production technologies and processes, the Framework states that eligible green assets will be aligned with SDG 9 (Industry, Innovation and Infrastructure), SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p> <p>In terms of category (5) Circular economy / energy efficiency, the Framework states that eligible green assets will be aligned with SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action).</p>
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			<p>In terms of category (6) Sustainable water and wastewater management, the Framework states that eligible green assets will be aligned with SDG 6 (Clean Water and Sanitation), SDG 9 (Industry, Innovation and Infrastructure), SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).</p>
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GLP COMPONENT 3: MANAGEMENT OF PROCEEDS			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Management of proceeds	<ul style="list-style-type: none"> Issuers should describe the governance within the company to manage the use of proceeds, including the supervision, tracking and reporting of the proceeds. The proceeds of green loans can be managed per loan (loan-by-loan approach) or on an aggregated basis for multiple Green Loans (portfolio approach). Proceeds should be credited to a sub-account, moved to a sub-portfolio or otherwise tracked in an appropriate manner (e.g., tagged in the internal accounting systems). The issuer can also choose to include a clause which states the commitment of the issuer to invest the proceeds [*] months after issuance. The issuer can inform on process in case a project no longer qualifies and the net proceeds originally allocated need to be reallocated. 	<p>Core</p> <p>Recommendation</p>	<p>The Framework states that all cash flows and balances will be performed through and accounted for in the Entity's accounts and will be monitored by the Entity's Financial teams.</p> <p>The Framework states that the Entity will allocate proceeds to eligible green projects selected in accordance with the eligibility criteria within up to 36 months of issuance of the green finance instruments. As stated in the Framework, at the date of issuance of the Framework, it is not yet possible to estimate the amounts that will be financed or refinanced, and this information will be reflected in the Allocation and Impact Report.</p> <p>The Framework states that the eligible green assets will be registered at their IFRS balance sheet value, updated annually to reflect investments and depreciation and may include both new financing and refinancing of existing projects. The Framework further states that if a look-back period applies for refinancing, such information will be disclosed in the Allocation and Impact Report.</p> <p>The Framework states that if any asset ceases to be eligible, the Entity will make its best efforts to replace it with another eligible green project as soon as practicable.</p> <p>The Framework states that the principal and interest payments of the green finance instruments under the Framework will be made from the Entity's general funds and will not be directly linked to the performance or execution of eligible green projects.</p>

Unallocated proceeds	Description of the intended types of temporary placement for the balance of unallocated net proceeds.	Core	<p>The Framework states that the Entity intends to allocate an amount equivalent to the net proceeds from each green finance instrument to eligible green projects as soon as reasonably practicable. The Framework further states that, pending allocation or reallocation, unallocated proceeds will be managed in line with the Entity's standard liquidity management practices, in cash, cash equivalents, or other liquid instruments that are consistent with the Framework. The Framework further states that if any asset ceases to be eligible, the Entity will make its best efforts to replace it with another eligible green project as soon as practicable.</p>
External review	<p>The management of proceeds may be externally verified, by an auditor or another independent third party, to verify the internal tracking method and the allocation of funds from the Green Loan proceeds. This verification is expected to take place annually or until full allocation.</p>	Recommendation	<p>The Framework states that the Entity will provide annual updates on activities related to its green finance issuance in the Allocation and Impact Report, where the Entity will seek to provide information on the allocation of proceeds as well as relevant impacts metrics, which will provide the assessment of the associated environmental impacts.</p> <p>According to the Framework, an independent external party, appointed by the Entity, will provide independent limited assurance on the Entity's Allocation and Impact Report until full allocation of proceeds from the green finance instruments.</p>

GLP COMPONENT 4: REPORTING			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Frequency, duration and level of allocation reporting	<p>The reporting should be renewed:</p> <ul style="list-style-type: none"> • Annually until full allocation of the proceeds of the relevant green loan. • In case of full allocation, on a timely basis in case of material developments. <p>The reporting can be done on the individual Green Loan level (loan-by-loan approach) or on aggregated level (portfolio approach).</p> <p>In case of loan-by-loan approach the issuer should clearly reference to which loan the reported impact belongs to.</p>	Core	<p>The Framework states that the Entity will prepare and maintain readily available reporting on the allocation of the proceeds to the eligible green projects. The Framework states that this reporting may take place in line with the Entity's general annual reporting cycle at least until the proceeds from the green finance issues have been fully allocated, through an annual Allocation and Impact Report. The Framework further states that once full allocation has been achieved, allocation reporting will only be provided in the event of material changes.</p> <p>The Framework states that the report on allocation in the Allocation and Impact Report will include:</p> <ul style="list-style-type: none"> – The total amount of eligible assets, – The portion (amount or percentage) of financing and refinancing, – A breakdown of what is financed and refinanced, and – The balance of unallocated proceeds. <p>The Framework states that the Allocation and Impact Report may be made available via the Entity's corporate website (https://www.secil-group.com/en/home) and will always be made accessible to interested parties. As further stated in the Framework, a summary of the Allocation and Impact Report may be published in the Entity's annual report.</p>
Frequency, duration and level of impact reporting	The report should include the output, expected/achieved outcome and/or impact of projects financed by Green Loan proceeds either on a project level or on a portfolio level throughout the life of the Green Loan or at a minimum, until full allocation of the proceeds.	Recommendation	The Framework states that the Entity will prepare and maintain readily available reporting on the impact of the eligible green projects. The Framework states that this reporting may take place in line with the Entity's general annual reporting cycle at least until the proceeds

	<p>Issuers are welcome to report throughout the life of the loan and are encouraged to make available the latest report either on their website or in another publicly available space, with the date that it was prepared.</p>		<p>from the green finance issues have been fully allocated, through an annual Allocation and Impact Report. The Framework further states that once full allocation has been achieved, impact reporting will no longer be mandatory but may continue throughout the life of the green finance instruments.</p> <p>The Framework states that the report on the impact in the Allocation and Impact Report will include:</p> <ul style="list-style-type: none"> – A brief description of the eligible projects and their contribution to the environmental objectives, and – Environmental impact indicators and metrics, per eligible green project.
Reporting indicators	<p>Description of the qualitative and quantitative impact metrics that will be used to demonstrate substantial contribution to environmental objectives per project category related to the criteria.</p> <p>For the calculation of indicators, where there is no single commonly used standard, issuers may follow their own methodologies while making these available to investors. For the calculation of greenhouse gas (GHG) emissions reduced/avoided, for instance, there are a number of calculation methodologies both within and across institutions. Issuers should be transparent as to the calculation methodologies used.</p> <p>The impact report should illustrate the expected/achieved environmental impact made possible as a result of projects to which green loan proceeds have been allocated.</p> <p>The expected environmental impacts should be based on ex-ante estimates (developed prior to project implementation) of expected annual results for a representative year once a project is completed and operating at normal capacity. In case of reporting on a portfolio level, ex-ante estimates can be based on the annual analyses per portfolio and, if several categories are financed, per category, if possible.</p>	Recommendation	<p>The Framework states that four main indicators have already been identified:</p> <ul style="list-style-type: none"> – CO₂ emissions, – Total energy consumption reduction, – Alternative fuel substitution rate, and – Total water withdrawal reduction. <p>According to the Framework, additional indicators may also be reported in the annual Allocation and Impact Report, where relevant, to better reflect the status and progress of the eligible green projects as of the reporting date.</p> <p>The Framework further states that the Entity might seek to complement the aforementioned indicators with relevant case studies, depending on availability of information and subject to confidentiality obligations, and may appoint specialized consultants to develop methodologies for the estimation and calculation of the impacts that are to be made publicly available.</p>

	Where possible and relevant, the issuer may use quantitative metrics on any identified social co-benefits (e.g., number of employees from decommissioned facilities currently employed by company/externally in X year).		
Indicator Methodology	<p>Description of the key underlying methodology and/or assumptions used in the quantitative determination.</p> <p>To facilitate comparison of project results, it is suggested that issuers aim to report on at least a limited number of sector specific core indicators for projects included in their green bond programmes.</p>	Recommendation	<p>The Framework states that the Entity intends to align the Allocation and Impact Report's methodology with the approach described in the "Handbook – Harmonized Framework for Impact Reporting" of June 2024.</p>
Estimated lifetime results	<p>It could also be beneficial to report the estimated lifetime results and/or project economic life (in years) to provide users with a basis for understanding the impact of the project over its lifetime.</p>	Recommendation	<p>The Framework states that eligible projects will lead to the replacement of fossil fuels with alternative fuels and renewable-based green hydrogen, the reduction of SOx and other gaseous emissions, the improvement of compliance with BAT-AEL emission limits, the improvement of energy efficiency, the promotion of industrial symbiosis, the reduction of the clinker factor and embodied CO₂, the extension of the lifecycle of cement-based materials, the increase in system-wide energy recovery, and the enabling of the substitution of high-moisture AFs with biogenic alternatives.</p> <p>The Framework further states that the impacts and environmental benefits of the eligible green projects may arise throughout their operational lifetime.</p>
Further information	<p>In this section you have the opportunity to provide further information, e.g. based on national regulations, data and/or certain KPI's, with regard to the SDGs or other information which could be useful for investors.</p> <p>For increased transparency, where possible and relevant, the issuer may consider reporting for green eligible project categories, the impact on workforce and communities, and other non-environmental benefits.</p>	Recommendation	<p>The Framework states that the Entity will report impact indicators in its Annual and Impact Report that best reflect the status and progress of the eligible green projects as of the reporting date. The Framework further states that the Entity intends to align the Allocation and Impact Report with the approach described in the "Handbook – Harmonized Framework for Impact Reporting" of June 2024.</p>

ENGAGING EXTERNAL REVIEW PROVIDERS			
Topic	Content	Core to the Principles / Recommendation	Observations and findings
Appointment	The GLP recommend that in connection with the issuance of a green loan or a green loan programme, issuers appoint (an) external review provider(s) to assess through pre-issuance external review the alignment of their green loan or green loan programme and/or Framework with the four components of the GLP.	Recommendation	<p>The Framework states that the Entity has appointed KPMG to provide independent limited assurance on the alignment of the Framework with the four core principles of ICMA's Green Bond Principles of June 2025 and with the four core principles of LMA's Green Loan Principles of March 2025.</p> <p>The Framework further states that the independent limited assurance report and the green finance framework may be made available on the Entity's website at www.secil-group.com.</p>
Type of external review	<input checked="" type="checkbox"/> Second Party Opinion <input type="checkbox"/> Verification <input type="checkbox"/> Certification <input type="checkbox"/> Scoring/Rating	Core	<p>The Framework states that through this Framework the Entity intends to align the Entity's funding with the Entity's sustainability roadmap, and expand access to a broader investor community, strengthen relationships with responsible investors, and actively contribute to the development of the green finance market. The Framework states that both the Framework and the annual Allocation and Impact Reports will be the target of independent limited assurance work.</p>
Public disclosure of the reports or templates	The GLP recommend public disclosure of external reviews (on the loan issuer's website and/or through any other accessible communication channel as appropriate before or at the time of the issuance) as well as using the template for performed external reviews.	Recommendation	<p>The Framework states that the independent limited assurance report and the green financing framework may be made available on the Entity's website at www.secil-group.com.</p> <p>The Framework further states that the annual Allocation and Impact Report and the corresponding independent limited assurance report may also be made publicly available on the Entity's corporate website at www.secil-group.com.</p>

External verification of reporting	Indicate if external review will be provided to verify the internal tracking and the allocation of proceeds.	Recommendation	The Framework states that an independent external party, appointed by the Entity, will provide an annual independent limited assurance report on the Entity's Allocation and Impact Report until full allocation of proceeds from the green finance instruments. As stated in the Framework, this review will cover the internal tracking method, the allocation of proceeds to eligible green projects, the remaining balance of unallocated proceeds, and the compliance of allocated resources with the eligible categories defined in this Framework.