HUMAN RIGHTS POLICY

1.

(Scope)

1. Secil, Companhia Geral de Cal e Cimento S.A. (hereinafter, "Secil" or "Company") acknowledges that respect for human rights, including labour rights, under the terms of this policy, is a guiding principle of its activities and is part of its commitment to sustainable development.

2. This policy is a benchmark for and governs the activities of Secil and the companies which are in a control or group relationship with the Company (hereafter "Secil Group"), regardless of the location of their head offices and activities, in the field of human rights, including labour rights. These companies shall adopt principles and commitments equivalent to those set out in this policy, taking into account the context and specific features of their respective activities and in compliance with the legislation applicable to them.

2.

(Framework)

Secil commitment to respect human rights in this policy has been established in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, namely the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the eight core ILO Conventions and the International Bill of Human Rights.

3.

(Commitments)

In accordance with the provisions in this policy, Secil makes the following commitments with

regard to human rights, including labour rights:

a) To implement sound corporate governance practices and respect human rights, including labour rights, and comply with applicable laws and regulations, within the scope of its activity, namely in relation to its employees, partners, suppliers, customers, other counterparties and local communities;

b) To respect the freedom of association of employees and the right to bargain collectively, recognising the importance of engaging in constructive and beneficial dialogue with all parties;

c) To promote dignity and respect for human beings in the work context, and not permit discrimination towards its employees, namely on grounds of ascendency, race, religion, language, gender, sexual orientation, disability, age, nationality, political beliefs, economic situation or social status, and value diversity, gender equality and inclusion to ensure real equal opportunities, with a focus on disabled persons;

d) To prevent all forms of harassment, abuse and violence in the workplace, by reproaching and punishing any behaviour intended to humiliate, threaten or intimidate or resulting in humiliation, threat or intimidation;

e) Not to resort to any form of child labour or forced or coerced labour;

f) To provide access to decent employment, ensuring a physically and psychologically safe and healthy work environment, fair and equitable remuneration, personal development and continuous training, the privacy of

the personal data, compliance with rest periods, access to applicable social protection schemes and respect for the right to parenthood for all workers, all the while encouraging work-life balance;

g) To ensure respect for human rights in all local communities in which it operates, namely by adopting measures that offset any negative impact of its activities, taking into account the local values, culture and traditions, and

h) To encourage the reporting of operations suspected of breaching the standards and good practices set out here through the usual reporting procedures or, alternatively, through the Secil Group Integrity Channel.

4.

(Dissemination, implementation and monitoring)

1. Secil shall promote the dissemination of this policy across the Company and the Secil Group and to current employees or those who may work for Secil in the future, thereby imbuing its corporate culture with this policy, namely by holding training sessions and incorporating its principles and commitments in operational procedures.

2. The Board of Directors will approve the necessary acts for the adoption of this policy, namely by establishing preventive and corrective measures and compliance evaluation procedures - aimed at identifying the main impacts and potential risks of its activity for human rights, including labour rights - and take the necessary actions and ensure the disclosure of relevant information on this matter in a transparent manner in its annual report.

3. Secil Executive Committee shall implement specific measures to promote this policy and ensure compliance with it, including the implementation of any necessary mitigation and corrective measures or remedies.

4. Secil staffers are responsible for reporting acts of non-compliance with the principles and commitments set out in this policy and for detecting any nonconformities through the reporting procedures in force or Secil Group Integrity Channel.

5.

(Adoption and entry into force)

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

The Board of Directors