



POLICY ON THE PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

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1.

(Scope)

1. Secil - Companhia Geral de Cal e Cimento, S.A. (hereinafter, "Secil" or "Company") acknowledges that combating and preventing money laundering and terrorist financing, as provided for herein, is a guiding principle of its activities and is part of its commitment to sustainable development.
2. This policy is a benchmark for and governs the activities of Secil and of the companies which are in a control or group relationship with the Company (hereafter "Secil Group"), regardless of the location of their head offices and activities, concerning the combat and prevention of money laundering and terrorist financing. The 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.
3. The principles and rules set out in this policy shall apply to all members of Secil's governing bodies, members of the committees, representatives, service providers and staff, hereinafter jointly referred to as Staffers, who undertake to comply with them.

2.

(Framework)

Secil's commitments to combat and prevent money laundering and terrorist financing are based the assumption of compliance with the laws and regulations in force and applicable to the activities performed in the relevant jurisdictions and have 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 to combat and prevent money laundering and terrorist financing:

- a) Secil and its Staffers shall comply with the laws and regulations on combating and preventing money laundering and financing of terrorism applicable in the jurisdictions where the respective activities are conducted;
- b) Secil and its Staffers shall not engage in any relationship with entities that, to their knowledge, carry out illicit activities and whose sources of income are also illicit and relate to money laundering or the financing of terrorism, or present a high risk of involvement in such activities;



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- c) Secil and its Staffers shall adopt measures to prevent illegal practices concerning money laundering and financing of terrorism;
- d) Secil undertakes to train its staff in subjects such as anti-money laundering and terrorist financing issues, especially those whose duties require it, and
- e) Secil undertakes to encourage the reporting of suspicion of money laundering or terrorist financing 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 shall approve the acts necessary for the adoption of this policy and the Executive Committee shall undertake the concrete measures for its dissemination and enforcement, including the implementation of the necessary mitigation, correction or remedy measures to be applied.
3. The Corporate Governance Committee will help the Board of Directors monitor the implementation of this policy and, if appropriate or necessary, review it.
4. Secil Staffers are responsible for reporting acts of non-compliance with the principles and commitments set out in this policy and for detecting any nonconformities through the usual reporting procedures or, alternatively, through the Secil Group Integrity Channel.

5.

(Adoption and entry into force)

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

The Board of Directors