



STAKEHOLDERS' ENGAGEMENT POLICY

1.

(Scope)

1. Secil, Companhia Geral de Cal e Cimento S.A. (hereinafter, "Secil" or "Company") recognizes that its respective stakeholders are a key player in the conduct of the Group's business, and channels are being promoted that allow increasing involvement of the different impacted actors for its operations, which must be listened to and involved in decision-making processes.
2. The consultation of different stakeholders to define how the Group manages its activity, constitutes, under the terms set out in this policy, a structuring principle of its activity and is included in its commitment to sustainable development.
3. This policy constitutes a benchmark for and covers the activities of Secil and companies that are in a control or group relationship with the Company (hereinafter, "Group" or "Secil Group"), regardless of the location of their head offices and activities, within the scope of business ethics. 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.

2.

(Stakeholders)

Secil Group's stakeholders are a key element in the development of the Group's activity, including, namely, shareholders, employees, customers, suppliers, surrounding communities, competent authorities and partners.

3.

(Framework)

The commitments made by Secil in this policy are based on the assumption of compliance with the laws and regulations and are 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.

4.

(Commitments)

Under the terms and for the purposes set out in this policy, Secil undertakes the following commitments regarding engagement with stakeholders:

- a) Strengthening dialogue with stakeholders, enhancing the creation of partnerships and promoting the exchange of experiences, resources, knowledge, skills and efforts;
- b) Integration of stakeholder expectations;
- c) Promotion of intervention and continuous identification of possible impacts on the communities surrounding



the areas where it carries out its activity;

- d) Enrichment of surrounding communities through job creation, local hiring and community involvement;
- e) Contribution to improving the well-being of populations and promoting initiatives whose objective is to support the development not only of communities, but also of the places where the Group is located;
- f) Sharing knowledge with stakeholders;
- g) Refrain from any undue interference in local political activities;
- h) Access to relevant corporate information and the development of the Group's activity by stakeholders;
- i) Inclusion of relevant contributions identified by stakeholders in the Group's strategy, and
- j) 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.

5.

(Dissemination, implementation and monitoring)

1. Secil shall promote the dissemination of this policy across the Company and the Secil Group, to its various stakeholders and to those who work 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. A The Board of Directors will approve the necessary acts for the adoption of this policy, namely by establishing preventive and corrective measures and compliance evaluation procedures - *aimed at identifying the main impacts and potential risks of its activity in this regard* - and take the necessary actions.
3. Secil Executive Committee shall implement specific measures to promote and comply with this policy including the implementation of any necessary mitigation and corrective measures or remedies.
4. All stakeholders along with 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.

6.

(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