

	GROUP POLICY	Doc N° GPO_16
		Rev. 2
	HUMAN RIGHTS POLICY	

CIMPOR Portugal Holdings, SGPS, S.A.

Human Rights Policy

Revision	Description and Reason for Revision
0	First Issue (04.12.2020)
1	First Revision (20.12.2023)
2	Second Revision

	FUNCTION	SECOND REVISION DATE
Prepared by:	Group Director of Internal Audit, Risk and Compliance Directorate	10.10.2025
Reviewed by:	TCC Legal Department	05.11.2025
Approved by:	Board of Directors	24.11.2025

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Introduction

CIMPOR Portugal Holdings, SGPS, S.A. and its subsidiaries or Affiliated Companies that are located in different countries and regions (hereafter referred to "CIMPOR" or "CIMPOR Group") is committed to a culture of compliance and conducting business in an ethical and responsible manner. CIMPOR believes that companies have a responsibility to respect international human rights standards, which means not to infringe people's rights and to address adverse human rights impacts that they may cause or contribute to. For this purpose, CIMPOR respect and support international principles aimed at protecting and promoting human rights, as described in the United Nations' Universal Declaration of Human Rights ("UDHR"), the United Nations Global Compact ("UNGC"), the International Labor Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, the European Convention on Human Rights, the United Nations Declaration on the Rights of Indigenous Peoples and the ILO Convention 169 on Indigenous Peoples, and the spirit and fundamentals of human rights embodied in such international treaties, in all countries and regions where CIMPOR conducts its business and each aspect of its business.

Our commitment to the respect of human rights consists in adopting this Human Rights Policy, implementing in the long term a structured process to support internationally recognized human rights and to avoid any complicity in human rights abuses, in particular, within CIMPOR's value chain. This Policy sets out CIMPOR's commitment to protect the fundamental human rights, as well as the dignity of the individuals working in its operations, regardless of their employment relationship with CIMPOR, and to promote the respect of all human rights within its value chain and business relationships.

CIMPOR enforced its journey toward the respect of human rights and responsible business practices with the publication and consequent implementation of its Code of Business Ethics and the Supplier Code of Conduct. Principles expressed in CIMPOR Group's Code of Ethics are aligned with the highest standards of ethical behavior, and in compliance with all applicable laws and regulations.

Scope

The Human Rights Policy applies to all CIMPOR employees, and its subsidiaries and affiliates. This Policy reflects CIMPOR global standards. However, because each jurisdiction may vary, CIMPOR will apply and enforce this Policy in a manner consistent with applicable local law.

Principles

CIMPOR's commitment lays on different principles concerning the fundamental human rights contained in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work which are the subject of those ILO Conventions, namely:

- (a) freedom of association and the effective recognition of the right to collective bargaining;
- (b) the elimination of all forms of forced or compulsory labour, human trafficking;

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(c) the effective abolition of child labour;

(d) the elimination of discrimination in respect of employment and occupation, fostering a diverse and inclusive workplace in which every employee is treated with respect; and

(e) a safe and healthy working environment.

Non-discrimination

CIMPOR respects diversity and avoids any form of unfair or unlawful discrimination in employment or occupation, promoting a culture where people recognize the value that a diverse and inclusive workforce brings. CIMPOR is committed to embracing all the differences in employees' age, gender, marital status, race or ethnicity, nationality, religion or other belief, sexual orientation, social and educational background, family and care responsibilities and any other form of diversity. CIMPOR is committed to creating a working environment, which is free from any direct or indirect, associative or individual discrimination, any sort of violence or harassment, either sexual or based on personal, political and cultural diversity. In case these types of discrimination would happen, they will not be tolerated, and remediation actions will be enforced. The aim of CIMPOR is to make sure that all employees treat others, at all times, with dignity, respect and fairness, exhibiting a conduct that reflects inclusion and supports the values of CIMPOR Group.

Child labour

CIMPOR commits to the effective elimination of child labour and adheres to the principles that any work which is likely to negatively impact children's physical, mental or moral health, safety or morals, is prohibited to children under the age of 18. The minimum age for work should not be below the age for finishing compulsory schooling, and in any case not less than the age of 15, which some exceptions for developing countries, where an age of 14 can apply, depending on national legislation. This commitment includes providing decent work for young workers and ensuring protection and safety of children in all business activities and facilities, while reinforcing community and government efforts to protect and fulfil children's rights.

Forced, bonded and compulsory labour

CIMPOR ensures voluntary employment for all its employees and works towards the elimination of any form of forced, bonded and compulsory labour within its value chain. Banned forced labour includes also human trafficking, threatening workers with severe deprivations, such as withholding passports or other ID documents, food or land or wages, physical violence or sexual abuse, or bonding workers through debts.

Freedom of association and recognition of the right to collective bargaining

CIMPOR guarantees an open and constructive dialogue with its employees and their representatives. Employees can engage in collective bargaining according to the applicable national laws, as a way of determining the contractual working conditions and regulating the implementation of collective agreement.

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Health and safety

As underlined in its Code of Business Ethics, CIMPOR duty is to ascertain that working conditions of its employees' respect health and safety standards, ensuring to its employees a safe working environment. The absence of disease or infirmity and physical and mental elements affecting health, which are directly related to safety and hygiene at work, must be guaranteed, including also noise, air pollution and vibration. CIMPOR refrains from knowingly entering into relationships that, directly or indirectly, expose employees to undue health and safety risks. Moreover, CIMPOR is committed in preventing any fatalities, injuries or ill health affecting workers or members of the public, or damage to the environment arising from operations by implementing a comprehensive health, safety and environmental compliance program.

Working conditions

Contracts must have written agreements on employment, with agreed terms and conditions, including notice periods on both sides. CIMPOR guarantees the fullest possible opportunity for each worker to qualify for, and to use his/her skills and endowments in a job for which he/she is well suited. Employees are guaranteed working hours set on national laws and industry standards, access to all the necessary facilities to create a pleasant working environment and annual leave according to national legislation of residence. Training is provided to all employees, ensuring equality in access to training and education and providing employees with full and productive employment.

Fair wages and equal compensation

CIMPOR ensures its employees fair and equal remuneration, including the ordinary, basic or minimum wage or salary and any additional emoluments. Employees are guaranteed at least the minimum wage required by national applicable law and benchmarked with the industry average. Whenever possible, employees are provided with all legally required benefits. When overtime hours occur employees shall be compensated at the rate established by law in the country of manufacture or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation. Equal gender remuneration for work of equal value is guaranteed, referring to rates of remuneration established without discrimination based on gender.

Commitment toward the local communities

CIMPOR recognizes the importance of the rights of locals to exercise their rights, ways of life and economic development and to maintain and develop their identities, languages and religions, within the framework of the countries and regions in which they live. Therefore, CIMPOR's responsibility toward local communities refers both to CIMPOR employees, locals and indigenous peoples living nearby CIMPOR Group's plants.

CIMPOR commitment to the respect of local community identity, regards their right to live in good conditions, including the quality of the surrounding environment around the production site. When planning and implementing environmental and resource-use strategies, CIMPOR ensures that business operations do not adversely affect human rights, through damage to the environment or reducing access to natural resources. Furthermore, CIMPOR contributes to the economic development of the community, ensuring fair, equal and respectful treatment and playing a positive influence in the area in which it operates. CIMPOR is open to dialogue with community representatives and is committed to promote engagement activities with the local stakeholders,

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contributing to existing programs or planning and implementing social investment programs in cooperation with governments and civil society.

Implementation

CIMPOR takes steps to reflect its commitment to human rights protection in CIMPOR everyday activities:

- Full Compliance with all applicable labour-related laws and regulations and CIMPOR Code of Business Ethics: CIMPOR expects and encourages employees throughout all business operations to uphold the aforementioned principles and practices, and CIMPOR upholds their employees accountable for adhering to this Policy and the Code of Business Ethics.
- Continuously reporting CIMPOR human rights efforts to stakeholders: CIMPOR reports on its implementation results of this Policy in the annual sustainability report following the European Union (“EU”) standards and requirements, namely, the EU Corporate Sustainability Reporting Directive, and provides period reports to stakeholders in an open and transparent manner, including on CIMPOR official websites if applicable.
- Supply chain and other business partners: CIMPOR continues to foster a safe, inclusive and respectful workplace and CIMPOR expects the same commitment from its suppliers and business partners. CIMPOR Supplier Code of Conduct sets forth requirements and expectations for CIMPOR suppliers including labor standards and working conditions and prohibits the use of child and forced labour in all aspects of supply chain. Following a risk-based approach, CIMPOR conducts human rights due diligence and audits to strategic suppliers and business partners in order to identify, prevent and mitigate potential and actual adverse human rights impacts throughout its supply chain.
- Human Rights risk assessment: CIMPOR conducts regular human rights risk assessments and reviews in order to assess impacts on people, not impacts on business of CIMPOR products and services. Results are reported and openly disclosed to CIMPOR Board of Directors.
- Regular training and awareness activities: CIMPOR trains relevant employees in the CIMPOR Supplier Code of Conduct and modern slavery prevention and monitors and assesses supplier performance.
- CIMPOR makes available to employees and third parties a whistleblowing channel on which they can raise concerns about potential violations of this Policy, CIMPOR Code of Business Ethics and Supplier Code of Conduct, detailed below.

Reporting and Solving Violations of the Human Rights Policy

CIMPOR provides access to an independent whistleblowing channel to raise concerns or identify adverse human rights impacts. The Speak Up Policy encourages and enables employees and any third party to raise serious concerns about any violations of the Code of Business Ethics, this Policy, and other CIMPOR’s policies and their principles. CIMPOR Ethics Hotline – Ethi.co - is directed to anyone who works for CIMPOR or conducts business with/on behalf of CIMPOR or any of its Subsidiaries. Through CIMPOR Ethics Hotline any involved party can report:

- information about illegal or underhand practices; or
- raise concerns about misconduct within CIMPOR Group.

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Should employees encounter an unethical practice or violation of this Policy, they can report directly to the Compliance Directorate or via ethics hotline channels (see Appendix 1 - Ethics Hotline Channels).

Access to ethics notifications is under the authority of the Group Director of Internal Audit, Risk and Compliance ("Compliance Director"), who is responsible for the security, confidentiality and management of all channels.

Responsibility within CIMPOR Group

CIMPOR' s Board of Directors is responsible for providing a business environment that allows the implementation of CIMPOR Human Rights Policy.

CIMPOR' s Board of Directors, Chief Human Resource Officer and Compliance Director are obliged to protect the employees from possible harassment after reporting and ensure occupational safety by guaranteeing confidentiality of all ethics notifications, in line with the Non-Retaliation Policy.

Compliance Directorate provides necessary training sessions for employees with the aim of raising awareness toward the topic, presenting and explain the principles supported by CIMPOR and the related tools and policies in place.

Penalties for Violation of the Policy

Employees who violate the Policy are subject to disciplinary action CIMPOR deems necessary and proportionate and including termination of employment if allowed under applicable law. In addition, if laws are violated, employees or CIMPOR may be subject to criminal penalties (fines or jail time) or civil sanctions (damage awards or fines).

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Appendix 1 - Ethics Hotline Channels

(i) You can submit a report anonymously via <https://cimporglobal.speakup.report/ethico>. Please note that each report will have a unique password and case number assigned by the system. Make sure to save both for future reference. OR

(ii) You may send an email to compliance@cimporglobal.com

OR

(ii) You may send mail to the address below:

Mr. Ozge Asciglu

Parnassusweg 819 1082 LZ

Amsterdam, Netherlands OR

(iv) You may report by telephone through the following numbers:

Turkey: 0080 04488 28602

Portugal & Cape Verde: – 800831302

The Netherlands: +31 10 700 75 03 (*Local call rates apply*)

Romania: 0800400653

Ivory Coast: 002250566770918

Cameroon: 00237657103112

Ghana: 00233596993553 (*Local call rates apply*)

Spain: +34 900 031 156 (*Local call rates apply*)

United Kingdom: 08000224118

France: 0805543753

(v) Download the “SpeakUp by People Intouch” mobile app from Google Play or the App Store and submit your report via the app.

To report via the mobile app or by phone, please use the Cimporg Organization Code: 126318