

Sustainability Report 2024

Inmocemento Group



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General Disclosures

ESRS 2 - General Disclosures

Innocemento Group Description

History and business model

The Innocemento Group was formed in the last quarter of the financial year 2024, arising from the spin-off of the real estate and cement manufacturing businesses of the FCC Group.

Precisely because of its long-standing membership of the centenary group of citizen services that is FCC, these two main lines of action of Innocemento bring a long experience characterised both by its commitment to the environment and to urban and social development.

This proven track record reaffirms Innocemento's commitment to globalisation and expansion, as well as the confidence of its stakeholders in its various activities.

The Group's priority is to improve the quality of life of citizens and contribute to the sustainable progress of society, and to achieve this, it will develop a variety of products and services, with a diversified business model.



It should be noted at this point that, although the Innocemento Group was legally incorporated on 7 November 2024, this report is backdated to 1 January 2024.

(SBM-1_01, SBM-1_02).

At the end of 2024, the Innocemento Group achieved a total revenue volume of 943,927 thousand euros (SBM-1_06), as a result of the joint efforts of all its employees, the breakdown of which by geographical area is shown below (SBM-1_03, SBM-1_04):

Geographical area	No. of workers
Europe	1,002
MENA	187


The business areas that make up the Inmocermento Group are described below, indicating the main activities carried out and the markets in which they operate:

	Main activities	Markets served
 Cement	<ul style="list-style-type: none"> - Production and marketing of cement, concrete, aggregate and mortar. 	<ul style="list-style-type: none"> - Europe (Spain, Netherlands and UK) - Africa (Tunisia)
 Real estate	<ul style="list-style-type: none"> - Development and operation of housing rental projects. - Leasing and management of office buildings, commercial premises and shopping centres. - Urban land management at different stages of development. - Promotion and sale of real estate products (mainly housing). 	<ul style="list-style-type: none"> - Europe (Spain, UK, Romania and Croatia)

As can be seen from the above information, the Inmocermento Group has no involvement in activities related to the fossil fuel sector (coal, oil and gas), the chemical production sector, the controversial arms sector, or the tobacco cultivation and production sector (SBM-1_09, SBM-1_15, SBM-1_17, SBM-1_19).

Description of the value chain

Being composed of two business areas specialised in different sectors, two value chains can be distinguished within the Inmocermento Group, which are set out below (SBM-1_25, SBM-1_26, SBM-1_27, SBM-1_28):

	Value chain
 Cement	<p>The Area engages in activities related to the production and marketing of cement, concrete, aggregate and mortar, materials necessary for all types of construction or maintenance work. These materials are mainly sold in bulk to companies in the construction sector, although they can also be distributed in bags to companies that distribute construction materials, which will subsequently be purchased by the consumer. Distribution is most commonly carried out by subcontractors or even by customers' own means.</p> <p>A large part of the minerals necessary for production are extracted by the Area in its own quarries, which relies on suppliers to obtain fuel, water, raw materials and consumables, containers and packaging, and the necessary machinery. As for the services provided by suppliers, those related to the maintenance and repair of facilities stand out.</p>

Value chain



Real estate

Within the Area's activity, a distinction can be made between services aimed at the rental or sale of housing, and those related to offices, premises and shopping centres. In the former, the client (tenant or buyer) coincides with the end user, for whom the service aims to promote access to and availability of housing. On the other hand, in the latter, aimed at promoting commercial activity, the clients are companies seeking to carry out their operations in the Area's properties, and the users are visitors who come to these properties for shopping, leisure or services.

As it provides Real Estate services, the main inputs necessary for the correct development of its activity would be the supply of energy and water for the centres, acquired through supply companies. The Area also requires the provision of services by suppliers, such as those related to cleaning and security.

In order to ensure the main inputs identified above, the Inmocemento Group relies on a large number of suppliers, so that the different areas can develop their operations without any disruption. Specifically, in 2024, the Inmocemento Group had relations with 4,804 suppliers. For more details on the types of inputs used in each of the business areas, see the section "Supplier relationship management", included in the chapter on Business Conduct.

Corporate governance structure

Administrative, management and supervisory bodies

Inmocemento's governance is made up of four essential bodies, which enable efficient strategic decision-making within the parent company.

The bodies that make up Inmocemento's governance structure, as well as the main functions assigned to each of them, are set out below.

- **General Meeting of Shareholders:** This is the highest decision-making body on matters within its competence, including, among others, the following: approval of the annual accounts and non-financial reports, allocation of profits and approval of management, amendment of the Articles of Association, appointment of directors, approval of remuneration policies for directors and any system of remuneration or incentives for directors or senior management that is related to the value of the Company's shares.
- **Board of Directors:** This is the body responsible for the management, direction, administration and representation of the Company, and focuses its activity on the supervision and control of the day-to-day management of the Group entrusted to senior management, as well as on the consideration of all matters of particular importance to the Company. In turn, and with a view to increasing its efficiency and transparency, its work is organised through the creation of different Committees:
 - **Audit and Control Committee:** Its main function is to support the Board, supervising the internal control, internal audit and risk management systems, both financial and non-financial, reporting to the Board on financial and non-financial information, establishing a channel of communication between the Board and the external auditor, and supervising and periodically evaluating the compliance model, as well as the Company's environmental, social and corporate governance rules and internal codes of conduct
 - **Appointments and Remuneration Committee:** Its main function is to advise, inform and make proposals to the Board on the appointment, re-election, ratification and removal of directors, as well as on the remuneration of directors and senior management of the Company. It also ensures diversity in the composition of the Board and its Committees.

The Inmocemento Group, in its firm commitment to best practices in good governance, aligns its conduct with the recommendations of the Good Governance Code for listed companies of the Spanish National Securities Market Commission (CNMV). In particular, it focuses its efforts on those recommendations that promote transparency, the integrity of its operations and the social and environmental sustainability of its activities











Composition of the Board of Directors



The Board of Directors of Inmocemento is made up of 11 members, of which one (1) is an executive director (GOV-1_01) and the other ten (10) are non-executive directors (GOV-1_02). The independent members of the Board of Directors represent 27% of the total number of members (GOV-1_07).

In terms of diversity, the directors are of different nationalities, Spanish and Mexican, and their average age is around 60, with two members in the 30-50 age range, and the remaining nine in the over-50 age range (GOV-1_05).

The gender diversity ratio is 57% (GOV-1_06). The percentage of women on Inmoco's Board of Directors is 36.36% (0.66% above the Spanish average (35.7%) according to the Spencer Stuart Index Report on Boards of Directors 2024), a percentage in line with Recommendation 15 of the CNMV's Good Governance Code for listed companies and with the objective established in the Annex to Directive (EU) 2022/2381, of 23 November 2022, which has been transposed into Spanish law through Organic Law 2/2024, of 1 August, on equal representation and balanced presence of women and men, which has redrafted article 529 bis of the Capital Companies Act, although its provisions will not apply to the Company until 30 June 2027.

The following table lists the members of the Board of Directors, which is governed by the principles of a representative structure and balanced governance.

Members of the Board of Directors	Position held in the Council	Nature	Audit and Control Committee	Appointments and Remuneration Committee
Juan Rodríguez Torres	President	Proprietary		
Gerardo Kuri Kaufmann	First Vice-President	Proprietary		
Alicia Alcocer Koplowitz	Second Vice-President	Proprietary		
Pablo Colio Abril	Director	Executive		
Carlos Slim Helú	Director	Proprietary		
Esther Alcocer Koplowitz	Director	Proprietary		
Alejandro Aboumrads González	Director	Proprietary		
Esther Koplowitz Romero de Juseu	Director	Proprietary		
Gisselle Morán Jiménez	Director	Independent		
Elias Fereres Castiel	Director	Independent		
Álvaro Vázquez de Lapuerta	Director	Independent		

  : President

  : Member

On the other hand, although the legal representation of workers has no members on the Board of Directors, in accordance with Spanish legislation (GOV-1_03), the Board Regulations include, among the general obligations of the director, the reconciliation of the interests of the Company with the legitimate interests of its employees, its suppliers, its customers and those of the other stakeholders that may be affected by the Company's activity ().

The role of governance bodies in sustainability issues

Roles and responsibilities

The Inmocemento Group's Sustainability Policy sets out the main strategic lines defined to promote sustainable development and establishes the Group's actions to address the main ESG (environmental, social and corporate governance) challenges, establishing the common framework for responding to the Inmocemento Group's sustainability-related impacts, risks and opportunities

Based on the governance model established in the Inmocemento Group's Sustainability Policy, which defines the responsibilities of the different bodies involved in the management of ESG activities (GOV-1_09), the Board of Directors is responsible for supervising compliance with this policy through the Audit and Control Committee (GOV-1_08).

The Audit and Control Committee is supported in this function by the Group's Sustainability Committee, which is the link between the businesses and Inmocemento in relation to sustainability, proposing initiatives, guiding the ESG strategic approach and reporting results to the Board (GOV-1_10).

The Committee is made up of the sustainability managers of the Cement and Real Estate Areas and the Inmocemento Group's Compliance and Sustainability Manager and is the management body responsible for implementing the Sustainability Policy (GOV-1_11). The Compliance and Sustainability Officer is responsible for the future development of the performance monitoring systems, including reporting to the Board, in relation to the Group's sustainability practices, and the identification of the risks associated with this matter and their management (GOV-1_12, GOV-1_13).

On the other hand, and in matters of business conduct, the Board of Directors has the power to approve internal regulations and codes, such as the Code of Ethics and Conduct and the Compliance Model and, ultimately, to ensure the ethical climate of the organisation. The Board is supported by the Audit and Control Committee, which is responsible for supervising and evaluating the Compliance Model, as well as proposing modifications and updates that contribute to its development and improvement, the Board periodically evaluates the Compliance Model, ensuring that it evolves and adapts to contemporary challenges, without losing sight of the principles that have forged the Company's path. (G1.GOV-1_01)

Given the diverse nature of the activities carried out by the different areas that make up Inmocemento, specific sustainability strategies are developed to comply with the Sustainability Policy. These strategies determine the different objectives to be met in each area for the management of ESG impacts, risks and opportunities, and their deployment is the responsibility of the corresponding Sustainability Committees of the business areas. Due to this specification of the objectives established for each Area, these are supervised by the respective Boards of Directors, where applicable, of the Group's subsidiaries that bring together each Area (GOV-1_14).

Skills and knowledge

Given the recent incorporation of Inmocemento and, therefore, of its Group, no specific assessment has been carried out to date to determine whether the Board of Directors has the necessary skills to supervise sustainability issues, nor has any specific training plan been developed for directors in this area, without prejudice to what may be established in the coming months (GOV-1_15, GOV-1_16, GOV-1_17).

Notwithstanding the above, the full experience of the members of the Board of Directors is detailed in section C.1.3 of Inmocemento's Annual Corporate Governance Report (GOV-1_04, G1.GOV-1_02).

Management of material impacts, risks and opportunities

As mentioned above, the Sustainability Policy is the common framework for responding to the Inmocemento Group's material impacts, risks and opportunities in ESG matters, and includes strategic lines related to environmental conservation and protection, the generation of a positive social impact and development, and good governance (GOV-2_01).

As mentioned above, and due to the recent constitution of Inmocemento and, therefore, of its Group, the systems for monitoring results will have to be defined in the future, including reporting to the Board, in terms of impacts, risks and opportunities (GOV-2_02).

Similarly, during November and December 2024, the Board of Directors of Inmocemento did not discuss issues related to the material impacts, risks and opportunities of the Inmocemento Group (GOV-2_03), although this will be done in the future in accordance with the terms set out in the law and the Company's internal rules.

Remuneration model

The Inmocemento Group has a Remuneration Policy applicable up to and including 2026, which aims to promote the long-term profitability and sustainability of the Company and incorporates the necessary precautions to avoid excessive risk-taking and the rewarding of unfavourable results (GOV-3_01).

This Policy, based on the principles of profitability and sustainability, has been applied since Inmocemento's shares were listed on the Spanish Stock Exchanges. Likewise, following a favourable report from the Appointments and Remuneration Committee, it will be submitted for approval at the first General Shareholders' Meeting to be held in 2025 (GOV-3_06).

This Policy, in accordance with the provisions of the Articles of Association, establishes the remuneration of all members of the Board in their capacity as such, based on a share in liquid profits, allowances for actual attendance at meetings, as well as the maintenance by the Company of directors' civil liability insurance. On the other hand, this Policy does not currently contemplate any remuneration for directors for the performance of executive duties (GOV-3_02, GOV-3_03, GOV-3_04, GOV-3_05, E1.GOV-3_01, E1.GOV-3_02, E1.GOV-3_03).

Strategic approach

Relationship between sustainability and business strategy

The Inmocemento Group's strategic approach is based on the company's mission and vision, which respectively establish its identity and the future it pursues. Aimed at improving the lives of citizens, they reflect Inmocemento's desire to contribute, through the solutions it offers, to the sustainable progress of society. As they are, together with the values, the main elements of the corporate culture, they are described in greater detail in the chapter Business conduct.

Inmocemento's business model focuses on the management and marketing of real estate assets and cement production. Following its spin-off from the FCC Group, Inmocemento seeks to maximise the value of its two main business areas independently.






Inmocemento's business strategy is closely linked to sustainability in several ways.

The Cement Area implements technologies and processes that reduce CO₂ emissions in cement production. This includes the use of alternative fuels and improving energy efficiency in its plants. It also focuses on the sustainable management of natural resources, promoting the use of recycled materials and waste reduction in its operations. The company invests in the research and development of more sustainable products that improve their mechanical performance and durability, extending the useful life of infrastructures. It also seeks to develop cements with a lower carbon footprint and construction materials that improve the energy efficiency of buildings.

With regard to Real Estate, its commitment to sustainability is reflected in several key aspects. On the one hand, the Area is committed to developing real estate projects that minimise environmental impact. This includes the use of sustainable materials, energy efficiency in buildings and proper waste management. On the other hand, the company focuses on the sustainable management of its heritage assets, such as offices and shopping centres, ensuring that these are resource efficient and environmentally friendly (SBM-1_21, SBM-1_22).

Responding to global ESG challenges





The Inmocemento Group understands its responsibility to provide innovative and sustainable solutions capable of responding to the challenges posed by a dynamic environment. It therefore focuses its efforts on achieving a resilient business model that is prepared for management adapted to the environmental, social and governance circumstances that arise in the sectors and geographies in which it operates. The Inmocemento Group has identified a series of global ESG trends that affect its two business areas:

Trend	Description
 Climate change and water stress	<p>Climate change is one of the most crucial challenges for humanity in the coming decades, and its urgency has been recognised globally by the international community. It entails significant impacts such as an increase in the frequency and intensity of extreme weather events (heat waves, droughts, floods, etc.).</p> <p>Water stress in certain geographies is another critical consequence of global warming, making sustainable water management a crucial issue, especially in the face of population growth and changing weather patterns.</p>
 Urban development	<p>Climate change is already triggering global migration, which is transforming urban development, and climate hazards are expected to cause population redistribution, thus increasing pressure on urban areas. In addition, urban population projections for 2050 estimate an increase of another 2.5 billion people, which will put further pressure on existing water resources and infrastructure.</p>
 Circular and sustainable economy	<p>Current production systems extract more resources than nature can replenish and release more pollutants than the natural environment can tolerate. The circular economy represents a fundamental shift in production and consumption patterns beyond simple waste management and can alleviate the current model's heavy reliance on natural resources.</p>
 Digital transformation, AI and cybersecurity	<p>Digital transformation has revolutionised the way organisations operate and adapt to an increasingly technological environment, driven by advances such as artificial intelligence (AI) and process digitisation processes.</p> <p>However, along with the opportunities offered by these technologies, new challenges arise, especially in the area of cyber security.</p>
 Biodiversity protection	<p>Despite international efforts in recent decades to conserve biodiversity, continued habitat loss, ecosystem degradation and species extinctions persist as threats to both the environment and society. A comprehensive approach combining regulatory and voluntary measures, strengthening the use of economic instruments and encouraging private sector participation to leverage available resources will be essential to meet the commitments made in this area.</p>

For each of these trends, the Inmocemento Group's business areas have defined a series of challenges, adapted to the characteristics of each activity, the achievement of which aims to support the development of the Inmocemento Group's sustainability, and which are set out below (SBM-1_23).








Cement

Trend	Challenges
 Climate change and water stress	<ul style="list-style-type: none"> - Set reduction targets aligned with carbon pricing and emissions trading mechanisms. - Develop projects to improve energy efficiency (process optimisation, equipment upgrades, etc.). - To focus on the use of alternative fuels with biomass as a source of thermal energy. - Increase the use of renewable energy sources in installations through PPA agreements. - Optimise the use of water resources by automating internal processes and leakage control, and by implementing wastewater reuse systems.
 Circular and sustainable economy	<ul style="list-style-type: none"> - Apply circular economy processes by replacing fossil fuels with alternative sources, promoting the use of various types of non-hazardous waste as a source of energy. - Increasing the recovery of industrial waste from third parties in production processes. - Optimise the management of waste produced in factories by implementing selective collection measures.
 Digital transformation, AI and cybersecurity	<ul style="list-style-type: none"> - Modernise, through the development of new digital tools, the company's administrative management and strengthen collaboration with suppliers. - Collaborate in developing R&D projects aimed at manufacturing construction products that are characterised by a more efficient use of resources. - Implement digital signature on delivery notes.
 Biodiversity protection	<ul style="list-style-type: none"> - Implement sustainable practices (soil morphology repair, revegetation of exploited areas and use of native species) to mitigate the alteration of natural habitats. - Develop management criteria, both in exploitation processes and in project design, for the promotion of biodiversity. - Collaborate in projects aimed at generating a positive impact on biodiversity. - Raise stakeholder awareness on biodiversity, sustainability and environmental management.



Real estate

Trend	Challenges
 Climate change and water stress	<ul style="list-style-type: none"> - Develop developments in accordance with the principles of sustainable architecture. - Design buildings with A or B energy certification. - Replace, for existing buildings, air-conditioning equipment with those using refrigerant gases with lower associated GHG emissions. - Use ECO LABEL certified cleaning products to mitigate the negative impact on the environment and human health. - Implement measures to monitor, reduce and manage water consumption efficiently, use rainwater and improve water treatment systems.
 Urban development	<ul style="list-style-type: none"> - Promote, through its activities, the development of spaces created for the well-being of the population. - Promote more sustainable habits and greater environmental awareness among users occupying the buildings.
 Circular and sustainable economy	<ul style="list-style-type: none"> - To reduce the overall waste generated and ensure its proper management. - Increasing the reuse of resources, through waste monitoring and revalorisation measures. - Implement, together with the different construction companies, a Waste Management Plan to improve the monitoring and revaluation of waste.
 Digital transformation, AI and cybersecurity	<ul style="list-style-type: none"> - Implement home automation in the home, improving the customer experience. - Collaborate in R&D projects aimed at developing technological systems that enable efficient use of resources.
 Biodiversity protection	<ul style="list-style-type: none"> - Develop, for each BREEAM certified property, an Environmental and Biodiversity Management Plan to protect and enhance ecologically valuable elements. - Collaborate in projects for the conservation, protection and population increase of local species.

ESG management model

Taking into account all the challenges faced by the company, the Inmocemento Group's commitment to sustainability is based on aligning its business model and its way of acting with a responsible approach in the environmental, social and governance dimensions.

To this end, the Group has established as a basis its Sustainability Policy, which sets out its commitments in this area, and which should guide its sustainability management model in the future.

Sustainability Policy

The Group's Sustainability Policy is the basis of Inmocemento's sustainability management model. It enables the integration of ESG principles in the activities of the business areas, while ensuring the commitment and good performance of all its members and alignment with the expectations of customers and society as a whole.

The Sustainability Policy sets out the key strategic lines to promote sustainable development, addressing environmental, social and governance challenges. The key points of the policy are framed around three strategic pillars: environmental conservation and protection, positive social impact and development, and good governance and exemplary performance. This Policy is the basis for the specific sustainability policies of the different business areas.

Sustainability Priorities

Conservation and environmental protection	Inmocemento is committed to being part of the solution to global warming mitigation and adaptation.
Positive social impact and development	Based on a management that places people at the centre of its core business, Inmocemento incorporates social action into its business model, contributing to social, cultural, economic and labour development and welfare, favouring job creation and improving the quality of life of the people and communities in which it operates.
Good governance, exemplary performance	Inmocemento is committed to Good Governance, aligning its guidelines with the main Corporate Governance recommendations. Inmocemento also works with its own standards of ethical behaviour, reinforced by its Code of Ethics and Conduct, and strengthened by a control and supervision system, for an exemplary behaviour of Inmocemento.

Furthermore, the Sustainability Policy sets out Inmocemento's commitments regarding dialogue with its various stakeholders. Aware that its *stakeholders* allow it to mobilise and exchange knowledge and resources, and enable the development of Inmocemento's activity, the Group seeks to strengthen the involvement and generation of relationships of trust with them, maintaining various channels of communication, channels of dialogue and participation (SBM-1_21).

Business Sustainability Strategies

As Inmocoemto has only recently been established, it does not have a formalised business strategy and no targets have been set in relation to the organisation's main products and services (SBM-1_21, SBM-1_22). However, the Business Areas developed the following specific strategies for sustainability management.

Cement Area

The CPV Spain Group has a 2030 Sustainability Strategy, based on three pillars: Environmental, Social and Governance, with 15 topics addressed in 31 lines of action. Its environmental commitment focuses on energy transition, reduction of CO₂ emissions, energy efficiency, circular economy, optimisation of resources and reduction of the carbon footprint of clinker, among others.

The social pillar seeks to improve corporate culture, prevent accidents, promote health and wellbeing, and develop staff talent to meet present and future challenges.

On governance, the strategy focuses on strengthening regulatory compliance, increasing transparency and building more resilient supply chains.

Real Estate Area





As a leading player in the real estate sector in Spain, the Realia Group is committed to directing its efforts towards a more sustainable and responsible future through its ESG Strategy 2024-2027.



This sustainability strategy is based on three fundamental ESG pillars and three cross-cutting pillars, which encompass a total of thirteen lines of work and forty specific goals related to the following subjects:

- Environmental
- Social
- Corporate Governance
- Digitisation
- Communication
- Training

Interaction with stakeholders

Until the spin-off of the FCC Group's Inmoco Areas in the last quarter of the year, the tools for dialogue and communication channels with stakeholders were common to all FCC Group Areas. These are detailed below (SBM-2_01):

Interest group	Communication channel	Purpose
 <p>Shareholders and investors</p>	<ul style="list-style-type: none"> - Company website. - Board of Directors and Committees. - General Meeting of Shareholders. - Shareholder Services Office. - <i>Roadshows</i> with investors. - Questionnaires and interviews with agencies. 	<p>To provide up-to-date and accessible information about the company, facilitating transparency and continuous communication; to ensure effective and accountable corporate governance, facilitating strategic decision-making and fostering shareholder participation and engagement; and to strengthen relations with the investment community.</p>
 <p>Clients and communities</p>	<ul style="list-style-type: none"> - Satisfaction surveys. - Figure of the interlocutor. - Channels of dialogue with customers and local communities according to business line. 	<p>To improve customer satisfaction and strengthen relationships by promoting responsible and collaborative management based on two-way communication and mutual understanding, to ensure that the company's actions are aligned with the interests and concerns of communities and customers, improving products and services and ensuring that needs and expectations are met.</p>
 <p>Workforce</p>	<ul style="list-style-type: none"> - One - Corporate Intranet - Whistleblowing Channel. - FCC360 - <i>App</i> tool. - Dissemination and awareness-raising campaigns. - Campus virtual learning platform - Employee portal. - Somos - <i>Online</i> company magazine. - Somos magazine poster in 12 languages. - Meetings with workers' representatives. 	<p>To optimise internal and effective communication with the company's staff, promoting an ethical and safe working environment, facilitating access to company information and resources, and encouraging training and professional development.</p>
 <p>Suppliers and contractors</p>	<ul style="list-style-type: none"> - Information and awareness-raising sessions. - Platform for supplier accreditation. - Compliance with the Code of Ethics and Conduct and the Anti-Corruption Policy. - Commitment to implement the UN Global Compact. 	<p>Reporting on company policies, ensuring compliance with quality and sustainability standards, guaranteeing ethical and legal practices in line with the Group's expectations.</p>

Interest group	Communication channel	Purpose
 Partners	<ul style="list-style-type: none"> - Agreements, sponsorships and donations. - Partnerships. - Business forums. - Publications and presentations. - <i>Due diligence</i> procedures. 	<p>Strengthening relationships, mutual support and strategic collaborations, sharing knowledge and ensuring integrity and compliance with ethical and legal standards, which contribute to the generation of more sustainable models.</p>
 Public administrations and regulators	<ul style="list-style-type: none"> - Participation in sectoral self-regulation and legislative developments. 	<p>To foster collaboration and dialogue by promoting a more balanced and effective regulatory environment, establishing standards and best practices within the industry, and promoting ethical, responsible and transparent behaviour that enhances the reputation of the sector and contributes to its long-term sustainability.</p>

(SBM-2_02, SBM-2_03, SBM-2_05)

As regards the organisation of these channels, relations with shareholders and investors, employees and suppliers have been centralised at the corporate level. For the rest of the stakeholders, their organisation depends on the Business Area, adapting each of the channels to the specific characteristics of the activity carried out (SBM-2_04). In turn, the results obtained in these interaction processes are considered when defining policies, procedures and/or specific actions in the development of the company's operations (SBM-2_06).

Following the spin-off of Inmoco's businesses, a process of adjustment and adaptation of the existing channels of communication with stakeholders has been initiated.



For the double materiality exercise of this year, the Group has relied exclusively on the knowledge of the Sustainability teams of the business areas and corporate managers, who are aware of the different initiatives for interaction with stakeholders and their main results. In this way, *stakeholder* perspectives are integrated into the exercise indirectly (SBM-2_07).

As the body responsible for approving the Sustainability Report, the contents of which are based on the results of the double materiality process, the Board of Directors is informed of the main impacts of Inmoco, which incorporate the vision and interests of the stakeholders affected by its activity (SBM-2_12).

Double materiality

Double materiality study

The Inmocemento Group has carried out a double materiality study, in accordance with the *European Sustainability Reporting Standards (ESRS)*, to identify the most relevant issues that should be the focus of this Sustainability Report. The study was based on the following dimensions:

 Impact materiality	It aims to identify the most relevant effects (positive, negative, current or potential) of the Group's activities on people and the environment.
 Financial materiality	It identifies future risks and opportunities that may significantly influence the Group's business model.

Considering the different activities carried out by the areas that make up Inmocemento, this study has been carried out separately for each of them. The process has been structured in the following phases (IRO-1_01, IRO-1_02, IRO-1_07):

- **Identification of impacts, risks and opportunities (IROs):** the list of IROs has been reviewed based on the previous year's work, which was more focused on own operations, and which involved the participation of the teams in charge of ESG management in Inmocemento's areas. Specifically, an analysis was made of the upstream and downstream value chain, as well as the geographies in which Inmocemento operates, identifying IROs related to business relationships and locations that may increase the risk of adverse impacts on stakeholders (IRO-1_03, IRO-1_04). In addition, this year, corporate personnel and compliance officers have been involved. It is worth mentioning that connections with impacts and resource dependencies have been considered when identifying risks and opportunities (IRO-1_08). Although no specific stakeholder consultations have been developed in this exercise (E2.IRO-1_02, E3.IRO-1_02, E4.IRO-1_05, E4.IRO-1_06, E4.IRO-1_07, E4.IRO-1_08, E5.IRO-1_02), the participation of the sustainability teams of the different areas has enabled an exhaustive process to be carried out, as well as the coverage of the different assets and activities (E2.IRO-1_01, E2.IRO-1_03, E3.IRO-1_01, E5.IRO-1_01).
- **Assessment of impacts, risks and opportunities:** although no stakeholder consultations were carried out this year, results obtained in the previous year (referring to employees, suppliers and customers) were considered (IRO-1_05) in the reassessment of the complete list of IROs, carried out by the sustainability teams of each business area and the aforementioned corporate managers, who are aware of the activities carried out by part of the scope of operations covered in this Report (IRO-1_14). In this phase, the variables considered, common to the Cement and Real Estate areas, differed between the two dimensions that make up the double materiality:
 - **Impact materiality:** impacts have been assessed according to the following elements, depending on their nature: scale (how serious/beneficial they may be), scope (extent), irremediability (how difficult it is to counteract or correct the impact) and likelihood (the degree to which an impact may occur). Negative impacts have thus

- been assessed on the basis of their severity (in turn composed of scale, extent and irremediability), while positive impacts have been assessed on the basis of their scale and extent. All possible combinations of the above variables were evaluated and categorised into five levels, to which a numerical value was assigned (Critical: 1; High: 0.8; Medium: 0.5; Low: 0.1). The probability has been expressed quantitatively and multiplied by the previous value, only in the case of potential impacts.
- **Financial materiality:** risks and opportunities have been assessed numerically considering the possible future financial effect, multiplied by the probability value, identical to the one used for the impact assessment (IRO-1_07, IRO-1_09).
 - **Determination of material impacts, risks and opportunities:** the prioritisation of the IROs to be reported in the report has been done by applying quantitative thresholds:
 - **Impact materiality:** Impacts have been classified according to their severity. Those assessed as "Critical" or "High" (i.e. above 0.8) are considered material, while impacts whose severity is "Medium" or "Low" (i.e. below 0.8) are considered non-material (IRO-1_06).
 - **Financial materiality:** Risks and opportunities have been prioritised in such a way that assessments with a value higher than 0.4 are considered material, i.e. those that may have a significant effect on the annual accounts in the future (IRO-1_09, IRO-1_10).

The process of identifying material impacts, risks and opportunities has been defined specifically for the preparation of the Sustainability Report, so Inmocemento has not yet integrated it into the company's overall management process or risk management processes and has not yet established internal control procedures beyond verification by an independent third party (IRO-1_10, IRO-1_11, IRO-1_12, IRO-1_13). Similarly, as this is the first year that the Inmocemento Group has reported information in accordance with the ESRS, no changes have been made (IRO-1_15).

Climate change

When identifying and assessing climate impacts, the greenhouse gas (GHG) emissions reported by the business areas (Cement and Real Estate) were considered (see indicator E1-6). To this end, impacts related to the main known emission sources in each Area have been identified and assessed, both in their own operations (Scopes 1 and 2) and in their value chain (Scope 3), in line with the available GHG inventories (E1.IRO-1_01).

Inmoco adopted as a reference the approaches implemented by the business areas in 2023, where a common methodology was developed, applicable to all contracts, projects or assets, for the identification and assessment of physical and transitional climate risks, the results of which were considered for the Group's double materiality study (E1.IRO-1_16).

This methodology includes the definition of the following scenarios, which group families of assumptions related to physical and transition risks (E1.IRO-1_07):

Scenario	Description	Sources
Trend scenario (Temperature rise in 2050 between 1.5 and 2.0°C above pre-industrial levels)	Balanced energy development is achieved, although dependence on fossil fuels remains. Represents an intermediate emissions pathway compared to other scenarios.	– IPCC SSP2-4.5 – IEA Stated Policy Scenario (STEPS)
Climate neutrality (Temperature rise in 2050 between 1.5 and 1.7°C above pre-industrial levels)	Accelerated steps towards sustainable development and carbon neutrality. Strong regulatory and market adjustments to achieve the Paris Agreement.	– IPCC SSP1-2.6 – IEA Announced Commitments Scenario (APS)
High-emission development (Temperature rise in 2050 between 1.6 and 2.4°C above pre-industrial levels)	The world economy is growing rapidly, but it is fuelled by fossil fuel exploitation and energy-intensive lifestyles. Current levels of CO ₂ emissions roughly double by 2050.	– IPCC SSP5-8.5

For the identification of physical risks, the following climatic hazards have been considered as they may have a significant impact on the Group's operations, processes and services:

	Temperature-related	Wind-related	Water-related	Solid mass related
Chronic	– Rising temperatures	– Variations in wind patterns	– Variations in rainfall patterns – Sea level rise – Water stress	– Soil erosion – Coastal erosion
Acute	– Heat waves – Cold snaps / frost – Forest fires	– Snowstorms / snowfall – Extreme hydro-meteorological phenomena (cyclones, hurricanes, sandstorms, etc.)	– Heavy rainfall – Coastal, storm and river flooding – Droughts	– Landslide

Taking the scenarios considered as a reference, the identification of physical climate risks is the result of analysing the possible situations with negative implications for the Inmoco Group, projecting the evolution of the above hazards in the geographies in which the assets are located and taking as a reference the short (2020-2039) and medium term (2040-2060) time horizons, according to the useful life of the infrastructures or services offered (E1.IRO-1_03, E1.IRO-1_05). In summary, risk identification is the result of assessing the danger posed by climate hazards to business assets, especially under the high emissions climate scenario (IPCC SSP5-8.5) (E1.IRO-1_02, E1.IRO-1_04, E1.IRO-1_08).

For the purposes of the assessment of physical climate risks, the methodology established is based on a qualitative assessment based on the probability of the occurrence of the hazard, the degree of exposure of the assets and the vulnerability of the activities. For the purposes of the double materiality analysis, the results obtained have been adapted to the variables defined in the ESRS (financial effect and probability), in order to allow comparability with the assessments of the other risks (E1.IRO-1_06)

For its part, the identification of transition risks and opportunities is also based on the analysis of the scenarios described above, within which the limit of global warming to 1.5°C in 2050 in line with the Paris Agreement is considered (E1.IRO-1_13), considering transition events that may impact the Group (E1.IRO-1_10, E1.IRO-1_11, E1.IRO-1_15). According to the defined methodology, risks and opportunities can be classified as follows:

	Type
Risks	<ul style="list-style-type: none"> – Policy and regulatory: Policy developments that seek to limit actions that contribute to the adverse effects of climate change or policy developments that seek to promote adaptation to climate change. – Technology: All risks associated with technological improvements or innovations that support the transition to a lower carbon and more energy efficient economic system. – Market: All changes in supply and demand for specific commodities, products and services. – Reputation: All risks linked to changing customer or community perceptions of an organisation's contribution to or detracting from the transition to a lower carbon economy.
Opportunities	<ul style="list-style-type: none"> – Resource efficiency: Related to improving resource efficiency in production and distribution processes, buildings, machinery and transport. – Energy source: Related to the shift in energy use towards low-emission energy sources. – Products and services: Related to innovation and development of new low-emission and climate-adaptive products and services. – Market: Opportunities in new markets or asset classes that can help the organisation diversify its activities and better position itself for the transition to a lower carbon economy. – Resilience: Related to the development of adaptive capacity to respond to climate change.

In the case of transition risks and opportunities, the time horizon to be considered is more limited, taking into account the Group's strategic planning deadlines. Thus, the short (2023-2025) and medium term (2025-2034) are aligned with the 2030 Agenda and the intermediate decarbonisation targets, while the long term (2035-2051) coincides with the horizon in which the climate neutrality ambitions have been set.

For the assessment of transition risks, both the probability of occurrence and the possible impact (strategic, operational, financial and reputational) on the Inmocermento Group are evaluated qualitatively. On the other hand, opportunities are qualitatively assessed on the basis of the Group's ability to take advantage of the opportunity and its effectiveness. As with physical risks, the results obtained have been adapted, in the materiality analysis, to the variables defined in the ESRS (E1.IRO-1_12).

Within the Inmocermento Group, no assets or activities have been identified that are incompatible with a transition to a climate-neutral economy. In this sense, the Cement Area's activity is subject to the emission rights market, but for this reason investments are continually being made to gradually reduce the intensity of GHG emissions through the recovery of alternative fuels and improvements in the thermal efficiency of its processes. (E1.IRO-1_09, E1.IRO-1_14).

Biodiversity

The process of identifying impacts related to biodiversity was based on participation with the sustainability teams of Inmocermento's business areas. This process was based on the analysis of the different topics, subtopics and sub-subtopics included in ESRS 1, AR 16. For each of them, the managers identified, based on their knowledge of the activities and centres of the areas, those issues on which Inmocermento may have an impact on biodiversity, as well as risks that may arise from dependencies on ecosystem services (E4.IRO-1_01, E4.IRO-1_02).

The Inmocermento Group has not developed a specific assessment of physical, transitional and systemic risks to biodiversity, so it has not been possible to incorporate it into the process of preparing the double materiality study (E4.IRO-1_03, E4.IRO-1_04).

The Group has sites located in or near biodiversity-sensitive areas (E4.IRO-1_14). Negative effects can occur in these centres, such as the fragmentation and impact of habitats and ecosystems (biotic and abiotic factors) or the displacement of species (E4.IRO-1_15). For this reason, the Areas continuously seek to implement actions and measures to mitigate the negative impacts in these areas, and continuous monitoring and supervision of the species that form part of conservation registers and that may be present in the spaces occupied by facilities or in their immediate vicinity is carried out (E4.IRO-1_16).

Appendix I

Basis for the preparation of the report

General basis for the preparation of the Sustainability Report

Basis for the preparation of the Sustainability Report and scope of information

The Sustainability Report of Inmocemento, S.A. (hereinafter, Inmocemento) has been prepared on a consolidated basis (BP-1_01), covering the same perimeter applied in the financial statements of Inmocemento, S.A. (BP-1_02).

The list of subsidiaries exempt from the obligation to prepare a Sustainability Report is included in Appendix I of the 2024 Annual Accounts of Inmocemento, S.A. (BP-1_03).

The Inmocemento Group has also identified, as part of the double materiality analysis, material impacts, risks and opportunities (hereinafter, IROs) with which it is connected beyond its own operations, through its commercial relationships. In this sense, the Sustainability Report includes information on how the Group manages these IROs in its value chain, with the exception of the following issues, for which it has made use of the transitional provisions set out in ESRS 1, section "10.2 Transitional provision related to chapter 5. Value chain": E1-6 Gross Scope 3 GHG emissions (BP-1_04).

In addition, the Group has availed itself of the transitional provisions set out in ESRS 1, section "10.4 Transitional provisions List of phased-in disclosure requirements", details of which can be found in the "Contents of the report" section of this chapter.

To ensure that the scope of reporting in this Sustainability Report coincides with the scope defined by the Group's Financial Statements, a method has been applied to estimate the metrics of certain companies that do not report information for various reasons, whether due to the immateriality of their environmental, social and governance (ESG) impacts, inactivity, the liquidation process, the absence of productive activity or having been incorporated into the Group during the financial year, among others. For this purpose, the percentage of available information has been analysed in terms of employees and an estimate has been made, increasing, where appropriate, the figures related to environmental or social indicators, depending on the number of employees linked to companies not covered in the scope of the information. Additionally, in the case of companies with specific metrics that are not available, specific estimation methods have been applied based on technical criteria defined by the business area itself. These cases are detailed in each of the corresponding standards (MDR-M_02).

Omission of information

Innocemento has not availed itself of any omission of information considered classified or sensitive, or related to intellectual property, *know-how* or results of innovation (BP-1_05).

Similarly, there have been no omissions of information in the Report related to impending events or issues under negotiation (BP-1_06).

Information relating to specific circumstances

Time horizons

Innocemento has aligned its double materiality study and the reporting of the information contained in this report with the time horizons as established in ESRS 1, section "6.4 Definition of short, medium and long term for information purposes" (BP-2_01, BP-2_02).

Value chain estimates

This report does not include any metrics that include estimated value chain data from indirect sources (BP-2_03, BP-2_04, BP-2_05, BP-2_06).

Sources of estimation and uncertainty of results

No quantitative metrics or reported monetary amounts have been identified that are subject to high levels of uncertainty (BP-2_07, BP-2_08, BP-2_09).

Changes in the preparation or presentation of sustainability information

As this is the first year in which the Innocemento Group has prepared a Sustainability Report in accordance with the *European Sustainability Reporting Standards* (hereinafter, ESRS), it is not necessary to present information on changes in the preparation and presentation of the information with respect to previous periods (BP-2_10, BP-2_11, BP-2_12).

Prior period errors

The Innocemento Group's Sustainability Report 2024 is the first report prepared in accordance with the ESRS, so no material errors have been identified for previous periods (BP-2_13, BP-2_14, BP-2_15).

Information derived from other legislation or generally accepted standards

Innocemento includes in its Sustainability Report additional information required by Law 11/2018, of 28 December, on non-financial information and diversity. This information is identified in "Appendix I: Additional information required by Law 11/2018" (BP-2_16). The Sustainability Report does not include additional information set out in other sustainability reporting standards or frameworks other than ESRS (BP-2_17).

Incorporation of information by reference

The following information requirements have been included as references to other Inmocemento Group documents. The following table also indicates the code of the requirement, together with the document to which the included information refers (BP-2_20):

List of requirements incorporated by reference

Code	Requirement	Document referenced
BP-1_03	Subsidiaries exempted from the obligation to prepare a Sustainability Report	Inmocemento Group Annual Accounts 2024
GOV-1_04	Relevant experience of the members of the administrative, management and supervisory bodies, for the sectors, products and geographic locations of the company	Inmocemento Group Annual Corporate Governance Report 2024
G1.GOV-1_02	Experience of administrative, management and supervisory bodies in business conduct issues.	Inmocemento Group Annual Corporate Governance Report 2024

Application of transitional provisions in accordance with ESRS Appendix C 1

With more than 750 employees, Inmocemento has not availed itself of the omission of ESRS E4, S1, S2, S3 or S4 as set out in ESRS 1 Appendix C (BP-2_21, BP-2_22, BP-2_23, BP-2_24, BP-2_25, BP-2_26, BP-2_27).

Mapping of the information provided on the due diligence process

In relation to the main due diligence aspects and processes, the various references in the Report that can be consulted for the Group's approach are shown below (GOV-4_01):

Key element of due diligence	Reference in the Sustainability Report
a) Integrate due diligence into governance, strategy and business model.	GOV-2, GOV-3, SBM-3
b) Involve stakeholders in all key due diligence steps.	GOV-2, SBM-2, IRO-1, MDR-P, S1-2, S2-2, S3-2, S4-2
c) Identify and assess negative impacts.	ESRS 2 IRO-1, ESRS 2 SBM-3
d) Take measures to manage negative impacts.	MDR-A, E1-3, E2-2, E3-2, E4-3, E5-2, S1-4, S2-4, S3-4, S4-4
e) Monitoring the effectiveness of these efforts and communication.	MDR-M, MDR-T, E1-4, E2-3, E3-3, E4-4, E5-3, S1-5, S2-5, S3-5, S4-5

For specific pages covering the various stages of the due diligence process, please refer to the table of contents located in Appendix I, Contents of the report.

Risk management and internal controls over sustainability reporting

Description of risk management and internal control systems related to sustainability reporting

Although the Inmocemento Group does not currently have an Internal Control System for Sustainability Information (SCIIS) and therefore does not have a procedure for assessing and prioritising risks related to sustainability reporting (GOV-5_02), the preparation of the Report is supported by the Sustainability functions of the Group's areas, which are ultimately responsible for the collection and quality of the data. In addition, the Sustainability Report is subject to a verification process by an independent third party, with a limited assurance scope (GOV-5_01, MDR-M_03).

Risks identified and mitigation actions taken

As a result of the verification process of the Sustainability Report, the independent third party assesses whether the information reported provides a true and fair view of Inmocemento's performance in relation to the contents required by the applicable regulations.

In this way, the main risks identified would be those that could lead to a qualification in the independent verification report, which would be reviewed by the Board of Directors, responsible for approving the Sustainability Report (GOV-5_05). As this is the first year in which information is reported in accordance with the ESRS, the Inmocemento Group has not identified any significant risks, as no qualifications have been received on the Non-Financial Information Statements for the last few years (GOV-5_03).

Furthermore, as a result of the verification process, the independent third party can identify recommendations related to both the presentation and the content of the information, based on the findings identified. The recommendations issued as a conclusion are considered with a view to the preparation of the report for the following year, sharing them with the participants involved, mainly the Sustainability functions of the Cement and Real Estate Areas (GOV-5_04).

Contents of the report

Disclosure requirements set out in the ESRS covered by the Sustainability Report

In order to determine the information to be included in the Sustainability Report, the results of the Group's double materiality analysis were used as a starting point. In this way, all material impacts, risks and opportunities have been identified, using the thresholds described in the definition of the process. Each of these impacts, risks and opportunities have been analysed, linking them to the related disclosure requirements (IRO-2_13).

In addition, no additional disclosure requirements have been defined, related to the application of other EU legislation, which have had to be incorporated in this Report (IRO-2_01). The disclosure requirements contained in the ESRS that are included throughout this document are set out below (IRO-2_02).

ESRS disclosure requirement	Page number
ESRS 2 GENERAL INFORMATION	
Basis for preparation	
BP-1 - General basis for preparation of sustainability statements.	24-26
BP-2 - Disclosures in relation to specific circumstances.	25-26
Governance	
GOV-1 - The role of the administrative, management and supervisory bodies.	7-10; 26,
GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies.	9-10; 26
GOV-3 - Integration of sustainability-related performance in incentive schemes.	10; 26
GOV-4 - Statement on due diligence.	26
GOV-5 - Risk management and internal controls over sustainability reporting	27
Strategy	
SBM-1 - Strategy, business model and value chain.	4-5; 11; 13; 15-16
SBM-2 - Interests and views of stakeholders.	17-18, 26
SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model.	34-36;45-46;52-53;58-59; 64-65; 110-114;159-160; 168-170; 177-179; 194-196; 207-208
Impact, risk and opportunity management	
IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities.	19-23
IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement.	28-33

ESRS disclosure requirement	Page number
MDR-P - Policies adopted to manage material sustainability matters.	46;54;60;66; 74-75; 115;121-122; 130-131; 144; 153-155; 161- 163; 165; 171; 180; 185-186; 199; 202; 204; 208; 210-211
MDR-A - Actions and resources in relation to material sustainability matters.	37;48; 55; 61; 67; 76- 81; 115-116; 122; 124-126; 128-129; 131- 132; 134-135; 139-140-142; 145-146; 148- 149; 163-164; 165-166; 173; 182; 187-190; 202-203; 208
MDR-M - Metrics in relation to material sustainability matters.	24; 27; 164; 166; 174-175; 183-184; 203; 209
MDR-T - Tracking effectiveness of policies and actions through targets.	57; 82-88; 120; 123; 127; 129; 133; 136-137; 140; 143; 146-147; 149; 164; 166; 176; 184; 191; 203; 206; 209
ESRS E1 CLIMATE CHANGE	
Strategy	
E1-1 - Transition plan for climate change mitigation.	36
Impact, risk and opportunity management	
E1-2 - Policies related to climate change mitigation and adaptation.	36
E1-3 - Actions and resources in relation to climate change policies.	76-78
Metrics and targets	
E1-4 - Targets related to climate change mitigation and adaptation.	82-85
E1-5 - Energy consumption and mix.	38-39
E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions.	40-43
E1-7 - GHG removals and GHG mitigation projects financed through carbon credits.	43
E1-8 - Internal carbon pricing.	43
E1-9 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities.	Subject to transitional provision

ESRS disclosure requirement	Page number
ESRS E2 POLLUTION	
Impact, risk and opportunity management	
E2-1 – Policies related to pollution.	46
E2-2 – Actions and resources related to pollution.	79
Metrics and targets	
E2-3 – Targets related to pollution.	86
E2-4 – Pollution of air, water and soil.	49-50
E2-5 – Substances of concern and substances of very high concern.	50
E2-6 – Anticipated financial effects from pollution-related impacts, risks and opportunities.	Subject to transitional provision
ESRS E3 WATER AND MARINE RESOURCES	
Impact, risk and opportunity management	
E3-1 – Policies related to water and marine resources.	54; 75
E3-2 – Actions and resources related to water and marine resources.	75
Metrics and targets	
E3-3 – Targets related to water and marine resources.	57
E3-4 – Water consumption.	56
E3-5 – Anticipated financial effects from water and marine resources-related impacts, risks and opportunities.	Subject to transitional provision
ESRS E4 BIODIVERSITY AND ECOSYSTEMS	
Strategy	
E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model.	59
Impact, risk and opportunity management	
E4-2 – Policies related to biodiversity and ecosystems.	60
E4-3 – Actions and resources related to biodiversity and ecosystems.	80
Metrics and targets	
E4-4 – Targets related to biodiversity and ecosystems.	87
E4-5 – Impact metrics related to biodiversity and ecosystems change.	62
E4-6 – Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities.	Subject to transitional provision

ESRS disclosure requirement	Page number
ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY	
Impact, risk and opportunity management	
E5-1 - Policies related to resource use and circular economy.	66
E5-2 - Actions and resources related to resource use and circular economy.	Voluntary, not reported
Metrics and targets	
E5-3 - Targets related to resource use and circular economy.	88
E5-4 - Resource inflows.	68-69
E5-5 - Resource outflows.	69-72
E5-6 - Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities.	Subject to transitional provision
ESRS S1 OWN WORKFORCE	
Impact, risk and opportunity management	
S1-1 - Policies related to own workforce.	115; 121; 130; 144; 153-154
S1-2 - Processes for engaging with own workers and workers' representatives about impacts.	150-153
S1-3 - Processes to remediate negative impacts and channels for own workers to raise concerns.	150-151
S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions.	115-117; 122; 124-126; 128-129; 131-132; 134-135; 139-142; 145-146; 148-149
Metrics and targets	
S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.	120; 123; 127; 129; 133; 136; 140
S1-6 - Characteristics of the undertaking's employees.	117-120; 192
S1-7 - Characteristics of non-employees in the undertaking's own workforce.	117; 155
S1-8 - Collective bargaining coverage and social dialogue.	157
S1-9 - Diversity metrics.	119-120; 192-193
S1-10 - Adequate wages.	157
S1-11 - Social protection.	Subject to transitional provision
S1-12 - Persons with disabilities.	132-133
S1-13 - Training and skills development metrics.	126
S1-14 - Health and safety metrics.	146
S1-15 - Work-life balance metrics.	122-123; 193

ESRS disclosure requirement	Page number
S1-16 – Remuneration metrics (pay gap and total remuneration).	135-136; 157
S1-17 – Incidents, complaints and severe human rights impacts.	158
ESRS S2 WORKERS IN THE VALUE CHAIN	
Impact, risk and opportunity management	
S2-1 - Policies related to value chain workers.	161-163
S2-2 - Processes for engaging with value chain workers about impacts.	167
S2-3 - Processes to remediate negative impacts and channels for value chain workers to raise concerns.	165
S2-4 -Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions.	163-166
Metrics and targets	
S2-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.	164
ESRS S3 AFFECTED COMMUNITIES	
Impact, risk and opportunity management	
S3-1 - Policies related to affected communities.	171-172
S3-2 - Processes for engaging with affected communities about impacts.	168-169
S3-3 - Processes to remediate negative impacts and channels for affected communities to raise concerns.	172
S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions.	173; 187-188
Metrics and targets	
S3-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.	191
ESRS S4 CONSUMERS AND END-USERS	
Impact, risk and opportunity management	
S4-1 - Policies related to consumers and end-users.	180-181; 185-186
S4-2 - Processes for engaging with consumers and end-users about impacts.	177-178
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Environmental Disclosures

ESRS E1 - Climate Change

Climate change, one of the most pressing challenges of our time, requires global solutions that integrate political, economic and social aspects. Aware of the magnitude and consequences of global warming, the international community responded by signing the Paris Agreement, a collective commitment to more effectively address global climate challenges. Through this agreement, it became clear that climate change requires the implementation of measures to address and mitigate its impacts, thereby seeking to reduce emissions and promote efficient and responsible energy consumption.

In this context, the Inmocemento Group joins the fight against climate change through the implementation of environmentally friendly actions and measures to minimise its carbon footprint, mitigate the negative impacts of its activity on climate change and lead the transition to a low-carbon economy.

Material impacts, risks and opportunities

The conclusions obtained from the Inmocemento Group's double materiality analysis in relation to climate change issues are set out below. Considering that this is the first year that information is reported in accordance with the ESRS, no trends are presented with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis, and in relation to climate change, the impacts of the Cement and Real Estate Areas that have been material for stakeholders are identified below.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Adaptation to Climate Change			
(I-E1.1) Contribution to climate change adaptation through the Group's products and services.	Real estate	CU	OP
Climate Change Mitigation and Energy			
(I-E1.2) Contribution to climate change from Scope 1 and 2 emissions.	Cement Real estate	CU	OP
(I-E1.3) Contribution to climate change from Scope 3 emissions.	Cement Real estate	CU	OP
(I-E1.4) Contribution to climate change mitigation as a result of renewable energy production.	Cement Real estate	CU	OP

* Issue dealt with by specific organisational issues.

CU: Current
ST: Short term
MT: Medium term
LT: Long term

OP: Own operations
UVC: Upstream value chain
DVC: Downstream value chain

Financial materiality

Furthermore, based on the double materiality analysis, the material risks and opportunities for both business areas that must be managed in the area of climate change and that have proven to be material for stakeholders are identified below.

Risk/opportunity (SBM-3_02)	Type	Physical/ Transition (E1.SBM- 3_01)	Area	Financial effects (SBM-3_08, SBM-3_09)	Location (SBM-3_02)
Adaptation to Climate Change					
(F-E1.1) Increase in global average temperature.	R	Physicist	Real estate	Increased operational costs and reduced productivity due to heat-related impacts (M).	OP
(F-E1.2) Reduction in the allocation of CO ₂ allowances.	R	Transition	Cement	Increased operating costs and production limitation due to reduced allocation of CO ₂ allowances.	OP
(F-E1.3) Insufficient development and adaptation to market requirements on climate change.	R	Transition	Cement	Loss of competitiveness and higher investment and technological development costs to adapt to new low-emission technologies (M).	OP
(F-E1.4) New regulation on Climate Change.	R	Transition	Real estate	Increased operating costs due to adaptation to climate change regulations and possible payment of penalties for non-compliance (M).	OP
Climate Change Mitigation and Energy					
(F-E1.5) Increase in energy costs.	R	Transition	Cement	Increased operational costs and loss of productivity due to higher energy prices, with possible impact on customers (M).	OP
(F-E1.6) Increase in expenditure on goods and services as a result of energy price volatility.	R	Transition	Cement	Increased expenditure on goods and services due to energy price volatility (M).	UVC
(F-E1.7) Increased valorisation of biomass fuels.	O	-	Cement	Reduction of CO ₂ emissions through energy recovery from waste and use of biomass fuels (M).	OP
<p>* Issue dealt with by specific organisational issues.</p> <p>R: Risk O: Opportunity</p> <p>M: Possible materialisation in the short term</p> <p>OP: Own operations UVC: Upstream value chain DVC: Downstream value chain</p>					

The impacts, risks and opportunities identified in the Inmocemento Group's own operations and value chain are mainly related to greenhouse gas emissions, the use of energy resources and the generation of renewable energies, aligned with the Group's activities, based on its strategy and business model (SBM-3_05). Aware of the effects of their impacts, risks and opportunities, the business areas that make up the Inmocemento Group have implemented measures to mitigate their effects, both on the company and its stakeholders. Therefore, although they are related to the Group's business model, it is not considered necessary to update these elements for the management of impacts, risks and opportunities (SBM-3_03, SBM-3_10).



Due to its recent creation, the Inmocemento Group has not yet developed an analysis of the resilience of its business model to climate change (E1.SBM-3_02, E1.SBM-3_03, E1.SBM-3_04, E1.SBM-3_05, E1.SBM-3_06, E1.SBM-3_07).

Policies related to climate change

As climate change redefines global priorities, organisations are challenged to adopt clear and effective policies to identify, assess, manage and/or remediate the associated impacts, risks and opportunities.

The Inmocemento Group faces these challenges in key areas such as climate mitigation and adaptation, energy efficiency, use of renewable energies and responsible resource management. Therefore, Inmocemento's business areas develop policies to manage the risks, impacts and opportunities related to climate change, as indicated in indicator SBM-3 (MDR-P_01). The areas work to reduce greenhouse gas emissions, optimise energy consumption, promote renewable energies and promote the minimisation of environmental impacts and the continuous improvement of their processes. This integrated approach ensures a balanced development between economic growth, environmental protection and social well-being.

The policies of both Business Areas are listed below, together with the main aspects they cover, related to climate change mitigation and adaptation, and are developed in Appendix II: Policies related to environmental management.



Area	Policy	Aspects covered			
		Mitigation (E1-2_01)	Adaptation (E1-2_01)	Energy efficiency (E1-2_01)	Renewable energies (E1-2_01)
 Cement	Environmental and Energy Policies ¹	✓	✓	✓	✓
 Real estate	Sustainability policy	✓	✓	✓	

As a consequence of the recent creation of the Inmocemento Group, it has not yet developed a Climate Change Mitigation Transition Plan that meets all the requirements established by the ESRS (E1-1_16).



¹ The Environmental and Energy Policy applicable to the Spanish cement plants and the Environmental Policy applicable to the Tunisian operations are included.

Actions related to climate change

In order to promote energy efficiency and mitigate and adapt to climate change, the Cement and Real Estate Areas of the Inmoco Group have implemented a series of measures in the past, which are described below:

Area	Measures implemented
 Cement	Climate action <ul style="list-style-type: none"> - Modification of furnace burners to optimise fuel consumption. - Use of fuels with a higher percentage of biomass. - Development of energy transition in cement plants. - Signing of renewable energy PPA contracts.
	Energy efficiency <ul style="list-style-type: none"> - Continuous process optimisation. - Implementation and improvement of furnace and mill driving systems. - Renewal of equipment. - Installation of presence sensors and LED luminaires. - Energy audits according to ISO 50001.
 Real estate	Climate action <ul style="list-style-type: none"> - Replacement of air-conditioning equipment with those using refrigerant gases with lower global warming potential. - Installation of energy-efficient and energy-saving air-conditioning systems in developments.
	Energy efficiency <ul style="list-style-type: none"> - Installation of LED luminaires in buildings. - Installation of more efficient air conditioning equipment. - Adjustment of air conditioning and heating temperatures. - Design of buildings with A or B energy certification.

The main actions implemented by both Business Areas during 2024 (MDR-A_01), focused on managing the impacts, risks and opportunities related to climate change mitigation and adaptation, detailed in indicator SBM-3, are listed and described below. These are further elaborated in Appendix III: Actions related to environmental management.

Area	Action	Short description
 Cement	Reducing the use of fossil fuels in clinker kilns	Reducing the use of fossil fuels in clinker kilns by replacing them with alternative fuels and the use of clean energies, promoting the circular economy through the recovery of waste.
	Reduction of CO ₂ emission ratio per tonne of cement	Reduction of CO ₂ emissions per tonne of cement by substituting alternative fuels and raw materials.
	Reducing the carbon footprint through renewable energy procurement	Procurement of renewable energy to reduce Scope 2 GHG emissions and reduce the risk of energy cost overruns.
 Real estate	BREEAM In-Use Certification of Office Buildings Portfolio	BREEAM certification in use of managed buildings to improve energy efficiency and promote climate change mitigation.
	Digitisation of consumption monitoring in managed buildings	Real-time monitoring of the consumption of managed buildings to promote energy efficiency and contribute to climate change mitigation.
	Replacement of traditional lighting with LED technology	Replacement of traditional lighting with LED technology in managed buildings.

Metrics related to climate change

Energy consumption and mix

Considering the material impacts, risks and opportunities of the Inmocemento Group, the metrics that allow the monitoring of the company's control and management with respect to energy consumption and mix are set out below.

This section aims to provide detailed information on progress against the targets set, meeting the disclosure requirements of section E1-5 on energy consumption and mix of the ESRS. It includes the consolidation of total energy consumption data for all Business Areas, together with the contextual information necessary to understand it.

Total energy consumption from own activities

The following table shows the Inmocemento Group's total energy consumption in MWh related to its own operations, distinguishing between fossil, nuclear and renewable energy consumption.

Energy consumption in own operations (MWh) (E1-5_01-E1-5_15)	2024
Fuel from coal and coal products (MWh) (E1-5_10)	1,021,972
Fuel from crude oil and petroleum products (MWh) (E1-5_11)	2,792,883
Fuel consumption from natural gas (MWh) (E1-5_12)	2,575
Fuel from other fossil sources (MWh) (E1-5_13)	34,785
Consumption of purchased or acquired electricity, heat, steam or refrigeration from fossil sources (MWh) (E1-5_14)	257,415
Total energy consumption from fossil sources (MWh) (E1-5_02)	4,109,629
Share of fossil sources in total energy consumption (E1-5_15)	75%
Total energy consumption from nuclear sources (MWh) (E1-5_03)	96,127
Share of energy consumption from nuclear sources in total energy consumption (MWh) (E1-5_04)	2%
Fuel consumption from renewable sources, such as biomass (including also industrial and municipal biowaste), biofuels, biogas, hydrogen from renewable sources, etc. (MWh) (E1-5_06)	865,593
Consumption of electricity, heat, steam and cooling purchased or procured from renewable sources (MWh) (E1-5_07)	393,688
Consumption of self-generated renewable energy (excluding that derived from the use of fuels) (E1-5_08)	0

Energy consumption in own operations (MWh) (E1-5_01-E1-5_15)	2024
Total consumption of energy from renewable sources (E1-5_05)	1,259,281
Share of renewable sources in total energy consumption (E1-5_09)	23%
Total energy consumption (MWh) (E1-5_01)	5,465,037

Energy intensity based on net income

Below, the Inmocermento Group presents information on the energy intensity ratio, calculated as total energy consumption in relation to net income. This information is focused on activities with a high climate impact, and the sectors are detailed below by business area (E1-5_18).

Business area	High impact sector (E1-5_19, E1-5_20)
Cement	C23.5.1 - Manufacture of cement C23.6.4 - Manufacture of mortars C23.6.3 - Manufacture of ready-mixed concrete B8.1.2 - mining of gravel and sand; extraction of clay and kaolin
Real estate	L68.1.0 - Purchase and sale of own property L68.2.0 - Renting and leasing of own or leased real estate L68.3.2 - Management of real estate for remuneration or on a contractual basis

Energy intensity based on net income (E1-5_18, E1-5_19, E1-5_20, E1-5_21, E1-5_22, E1-5_23)	2024
Total energy consumption of activities in sectors with high climate impact (MWh)	5,458,691
Net income from activities in sectors with high climate impact (€)	673,541,616
Net income (other) (€)	270,587,810
Total net income included in the financial statements (€)	944,129,426
Energy intensity ratio in sectors with high climate impact (MWh/€)	0.01

The breakdown of renewable and non-renewable energy production of the Inmocermento Group is not available (E1-5_16) (E1-5_17).

Gross Scopes 1, 2, 3 GHG emissions

Considering Inmocemento's material impacts, risks and opportunities, the metrics that allow the monitoring of the company's control and management of gross GHG emissions of Scope 1, 2 and 3 are set out below.

This section aims to provide detailed information on progress against the targets set, meeting the disclosure requirements of section E1-6 on gross emissions in metric tonnes of CO₂ equivalent (tCO₂eq) of Scopes 1, 2 and 3 of the ESRS. This includes the consolidation of data on direct emissions (Scope 1) and indirect emissions derived from electricity consumption (Scope 2) in own operations and those generated along the value chain (Scope 3) of the Business Areas, together with the contextual information necessary to understand them.

Gross Scope 1 GHG emissions

The gross Scope 1 GHG emissions in tCO₂eq emitted by Inmocemento in 2024, by consolidated accounting group (including the parent company and subsidiaries), are presented below. Currently, the Inmocemento Group has not identified emissions by investees (understood as associates, *joint ventures* or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group, as well as contractual arrangements that are unstructured joint arrangements through an entity for which Inmocemento has operational control).

Scope 1 GHG emissions (E1-6_01, E1-6_02, E1-6_03)	2024 (tCO₂eq)
Scope 1 gross GHG emissions (tCO ₂ eq) (E1-6_07)	4,038,862
% Scope 1 GHG emissions from regulated emissions trading schemes (tCO ₂ e) (E1-6_08)	74%

In this case, the share of GHG emissions from regulated emissions trading schemes comes from the Cement Area (E1-6_08).

As this is the first year of the Inmocemento Group, no significant changes have occurred during 2024, in relation to Scope 1 GHG emissions (E1-6_14, E1-6_16).

The methodologies for calculating Scope 1 greenhouse gas (GHG) emissions in Inmocemento vary according to the business area and are adapted to local regulations. In the Cement Area, emission factors are applied according to ETS or MITECO regulations and fuel consumption is managed using an internal methodology and ERP SAP. On the other hand, in the Real Estate Area, the MITECO Carbon Footprint Calculator and the MITECO 2023 services (E1-6_15) are used.

Gross Scope 2 GHG emissions

The gross Scope 2 GHG emissions in tCO₂eq emitted by Inmocemento in 2024 are presented below, both according to the *location-based* and *market-based* approach. In the same way as for Scope 1, the information is included by consolidated accounting group; the data for investee companies is not currently reported.

Scope 2 GHG emissions (E1-6_01, E1-6_02, E1-6_03)	2024 (tCO₂eq)
Scope 2 "location-based" gross GHG emissions (tCO ₂ e) (E1-6_09)	124,178
Scope 2 "market-based" gross GHG emissions (tCO ₂ e) (E1-6_10)	55,857

As this is the first year of the Inmocemento Group, no significant changes have occurred during 2024, in relation to Scope 2 GHG emissions (E1-6_14, E1-6_16).

The methodologies for calculating greenhouse gas (GHG) emissions vary by business area. In the Cement Area, an approach based on the Spanish electricity mix in 2023 or a market-based approach, according to energy purchase agreements, is applied. On the other hand, in the Real Estate Area, the MITECO Carbon Footprint Calculator and the national energy mix (E1-6_15) are used.

Gross Scope 3 GHG emissions

However, in accordance with the transitional provision in section 10.2 of ESRS 1, all the information that has been collected regarding the gross Scope 3 GHG emissions in tCO₂eq emitted by the Inmocemento Group in 2024 is included below:

GHG emissions Scope 3 (E1-6_01, E1-6_02, E1-6_03, E1-6_04, E1-6_05, E1-6_11, E1-6_25, E1-6_26, E1-6_27, E1-6_29)	2024 (tCO₂eq)
1 Goods and services procured	17,020
2 Capital goods	0
3 Fuel and energy activities (not included in Scope 1 or Scope 2)	0
4 Upstream transport and distribution	11,068
5 Waste generated from operations	0
6 Business travel	20
7 Employee secondment	0
8 Assets leased in pre-commencement stages	0
9 Transport and downstream distribution	0

GHG emissions Scope 3 (E1-6_01, E1-6_02, E1-6_03, E1-6_04, E1-6_05, E1-6_11, E1-6_25, E1-6_26, E1-6_27, E1-6_29)	2024 (tCO₂eq)
10 Transformation of products sold	0
11 Use of products sold	0
12 End-of-life treatment of sold products	0
13 Assets leased in later stages	0
14 Franchises	0
15 Investments	0
Total gross emissions	28,108

As this is the first year of the Inmocemento Group, there have been no significant changes during 2024 in Scope 3 GHG emissions (E1-6_14, E1-6_16). In the Cement Area, the *GHG Protocol* methodology is adopted. On the other hand, in the Real Estate Area, they use the data obtained from the life cycle analysis of the developments computed, as well as the data provided by the travel agency, the *Join up* platform and the personnel department for business trips (E1-6_15) (E1-6_29).

Gross emissions by scope type

The following data is reported for total GHG emissions in tCO₂e, broken down by location and market calculation:

Total GHG emissions by scope type	2024 (tCO₂e)
Total GHG emissions by location (E1-6_12)	4,191,149
Total GHG emissions by market (E1-6_13)	4,122,827

The calculation of total GHG emissions is based on the sum of Scope 1, 2 and 3 emissions reported above.

Contractual instruments used for the purchase and sale of combined energy

Regarding the contractual instruments used for Scope 2 emissions, the Cement Area uses PPA contracts that specify the renewable origin of the energy (E1-6_23). In the Real Estate Area they use Guarantees of Origin (GoOs) (E1-6_19). However, information on the percentage of contractual instruments used for the purchase and sale of energy with or without attributes related to energy generation in relation to Scope 2 GHG emissions is not available (E1-6_18) (E1-6_21) (E1-6_22).

Biogenic emissions of CO₂ and other biomass-related greenhouse gases (GHGs)

Quantitative data on biogenic CO₂ emissions from biomass combustion or biodegradation broken down by emission scope are reported below. As mentioned above, the data reported are for the consolidated accounting group.

Biogenic emissions of CO₂ and other biomass-related greenhouse gases	2024 (tCO₂eq)
Biogenic CO ₂ emissions from biomass combustion or biodegradation (tCO ₂ e) - Scope 1 (E1-6_17)	254,647
Biogenic CO ₂ emissions from biomass combustion or biodegradation (tCO ₂ e) - Scope 2 (E1-6_24)	0
Biogenic CO ₂ emissions from biomass combustion or biodegradation in the upstream and downstream value chain (tCO ₂ e) - Scope 3 (E1-6_28)	0

GHG emissions intensity and its connectivity to financial reporting information

Data for the year 2024 is presented below, detailing total GHG emissions by both location and market, in terms of tonnes of CO₂ equivalent per euro of net income.

GHG emissions intensity per net income (E1-6_30) (E1-6_31) (E1-6_32)	2024 (tCO₂e/miles €)
Total GHG emissions (by location) per net income	4.44
Total GHG emissions (by market) by net income	4.37

The net revenue used to calculate the GHG intensity was 943,927 thousand euros. This net turnover is shown in the profit and loss account of the Inmocemento Group's financial statements (E1-6_33) (E1-6_34) (E1-6_35).

GHG removals and GHG mitigation projects financed by carbon credits



Currently, the Inmocemento Group has not established GHG removal and storage projects in the Group's own operations such as emission mitigation projects financed through carbon credits, both within and outside the company's value chain (E1-7_01, E1-7_02, E1-7_03, E1-7_04, E1-7_05, E1-7_06, E1-7_07, E1-7_08, E1-7_09, E1-7_11, E1-7_12, E1-7_13, E1-7_14, E1-7_16, E1-7_18, E1-7_19, E1-7_20, E1-7_21, E1-7_22 E1-7_23, E1-7_24, E1-7_25).

Domestic carbon prices

Currently, the Inmocemento Group has not implemented internal carbon pricing systems (E1-8_01, E1-8_02, E1-8_03, E1-8_04, E1-8_05, E1-8_06, E1-8_07, E1-8_08 and E1-8_09).

Targets related to climate change

The measurable targets established to support climate change mitigation and adaptation policies that reflect the willingness to manage the impacts, risks and opportunities described in indicator SBM-3 are detailed below. They are further specified in Appendix IV: Targets related to environmental management.

Area	Targets	Short description
 Cement	Reduction of CO ₂ emissions from process and combustion in grey cement	The target is to reduce CO ₂ emissions in Spanish cement factories to 0.540 tCO ₂ eq per tonne of grey cement. This target is part of its Environmental and Energy Policy.
	Increasing the share of energy purchased from renewable sources	The goal is to reach 80% of energy purchased from renewable sources by 2030. This target is aligned with the company's Environmental and Energy Policy, with the aim of reducing the carbon footprint and promoting the use of clean energy in all operations.
	Increase the percentage of thermal substitution of fossil fuels by alternative fuels.	The target is to achieve a thermal substitution of fossil fuels by alternative fuels of more than 70% by 2030. This target is aligned with its Environmental and Energy Policy.
 Real estate	Greenhouse gas reduction in managed buildings	The aim is to reduce greenhouse gases in developed buildings and developments by 25% by 2030.

ESRS E2 - Pollution

Pollution prevention is an important aspect of the Inmocermento Group's commitment to sustainability and respect for the environment. The Group works proactively to reduce and minimise the negative impacts of its operational activities, promoting a sustainable use of natural resources and adopting responsible practices in all processes.

Below is a detailed description of how the Inmocermento Group manages this key aspect, reflecting its commitment to sustainability and the preservation of the natural environment.

Material impacts, risks and opportunities

The conclusions obtained from the Inmocermento Group's double materiality analysis, in relation to issues related to pollution prevention, are set out below. Considering that this is the first year that information is reported in accordance with the ESRS, no trends are presented with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis, and in relation to pollution, the impacts that have been material for stakeholders are identified below.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Air pollution			
(I-E2.1) Atmospheric pollution derived from the emission of polluting gases in own operations (NOx, SOx, VOCs, particles and metals).	Cement	CU	OP
(I-E2.2) Air pollution from the production of goods and services (NOx, SOx, particulate matter, etc.) in the upstream value chain.	Cement	CU	UVC
* Issue dealt with by specific organisational issues.		CU: Current ST: Short term MT: Medium term LT: Long term	OP: Own operations UVC: Upstream value chain DVC: Downstream value chain

Financial materiality

Likewise, based on the double materiality analysis, no material risks and opportunities related to contamination have been identified for any of the Inmocemento Group's areas.

The impacts identified result mainly from atmospheric pollution derived from air pollutants because of the activities carried out in the Cement Area's own operations or in the value chain, based on its strategy and business model (SBM-3_05). Aware of the effects of its impacts, over the years the Cement Area has implemented measures to mitigate their effects, both on the company and its stakeholders. Therefore, although they are related to the strategy and business model, it is not considered necessary to update these elements for impact management (SBM-3_03, SBM-3_10).




Given the activity carried out by the Real Estate Area, no material impacts, risks and opportunities related to pollution have been identified, so this issue is not a material aspect for this business. Therefore, this chapter does not describe the policies, actions and objectives established by this area.

Policies related to pollution

The Cement Area considers pollution prevention as a central issue in its environmental management and, in line with its environmental commitment, is committed to limiting the impact of its activities on the environment. For this reason, it has implemented a policy adapted to its operations.

This policy reflects a clear commitment to pollution reduction and prevention, focusing on managing the impacts detailed in indicator SBM-3. Through the sustainable use of natural resources and compliance with current regulations, it aims to transform its activities towards more responsible models, promoting sustainable and environmentally friendly practices (MDR-P_01).

The Cement Area's policy on pollution and the main aspects it covers are mentioned below, establishing the commitments and general principles of action applicable to the business area. This policy is developed in more detail in Appendix II: Policies related to environmental management.


Area	Policy		Aspects covered		
			Related negative impacts (E2-1_01)	Substances of concern (E2-1_02)	Incidents and emergencies (E2-1_03)
 Cement	Environmental Energy Policy	and			

Actions related to pollution


In accordance with the activity of the Cement Area, measures are identified that contribute to the minimisation of pollution, whether atmospheric pollution derived from emissions of polluting gases; water and soil pollution due to spills and discharges; light pollution due to light emissions or noise pollution due to noise generation, expressing a firm commitment to reduction and considering at all times compliance with the legal requirements established in the different territories in which it operates.

main sources of pollution and the measures implemented by the Cement Area to reduce their impact are identified below.

Air pollution (NO_x, SO_x, particulate matter)


Area	Main sources	Measures implemented
 Cement	Use of clinker kilns in the manufacture of cement. Use of machinery and vehicles.	<ul style="list-style-type: none">- Implementation of selective non-catalytic reduction techniques for NO_x emission reduction.- Installation of burners with associated low NO_x emissions.- Control of fuel dosage.- Installation of sleeves and electrostatics, in order to reduce concentrations in channelled sources.- Installation of filters in conveying and transfer of powdery materials.- Irrigation of tracks and roads.- Use of sweepers and vacuum trucks to avoid diffuse emissions.

Spills and discharges


Area	Main sources	Measures implemented
 Cement	<ul style="list-style-type: none">- Discharge of rainwater and sanitary sewage.- Generation of leachate from stored material.	<ul style="list-style-type: none">- Installation of purification systems in quarries and factories to guarantee the quality of the discharge.- Implementation of closed circuits for wastewater reuse.- Storage of waste under roof, on concreted surfaces, and with retention bins.- Compliance with regulatory inspections of tanks for hazardous substances, such as fuels.

With regard to noise and light pollution, the Cement Area establishes specific actions that are adapted to the characteristics and specificities of its activities. The measures implemented are described below:

Light and noise pollution

Area	Measures implemented
<div>  </div> <div>Cement</div>	<ul style="list-style-type: none"> - Installation of noise barriers - Sound insulation of machinery - Environmentally friendly night lighting.

Below, describes the main action implemented by the Cement Area during the 2024 financial year (MDR-A_01), focused on managing the impacts related to pollution, detailed in indicator SBM-3. In Appendix III: Actions related to environmental management, it is developed in more detail.

Area	Action	Short description
<div>  </div> <div>Cement</div>	Improving air quality	Installation of improvements in the processes and installations for cement factories in Spain, aimed at improving air quality (road watering, sweepers, wind screens, control of powdery stockpiles), thereby reducing the number of complaints about emissions.

Metrics related to pollution

Pollution of air, water and soil

Considering the material impacts of the Cement Area, the following metrics provide an understanding of the emissions of pollutants to air, water and soil.

This section aims to provide detailed information on progress against the targets set, meeting the disclosure requirements of ESRS pollution section E2-4. The Cement Area metrics of the facilities under financial and operational control are included. The methodologies used for measurement and data collection are also described, along with any changes in emissions observed over time.

Pollutants emitted and microplastics generated or used

The following table details the quantities of the main pollutants emitted by the Cement Area into the air during 2024, which exceed the thresholds as set out in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council concerning the European Pollutant Release and Transfer Register (E-PRTR). ²

Pollutant	Volume of atmospheric emissions (kg/year) (E2-4_01, E2-4_02, E2-4_03, E2-4_04)
Carbon monoxide (CO)	12,277,023
Carbon dioxide (CO ₂)	3,581,184,837
Nitrous oxide (N ₂ O)	17,379
Ammonia (NH ₃)	127,826
Non-methane volatile organic compounds (NMVOC)	101,997
Nitrogen oxides (NO _x /NO ₂)	92,032,759
Sulphur oxides (SO _x /SO ₂)	1,466,390
Cadmium and compounds (Cd)	16
Mercury and compounds (Hg)	95
Benzene	4,676
Chlorine and inorganic compounds (HCl)	13,847
Particulate matter (PM ₁₀)	224,386

Currently, the volume of pollutants emitted to water has been measured, although this volume is not included as it does not exceed the previously indicated threshold. On the other hand, pollutants in soil have not been assessed in 2024.

² The Real Estate Area does not have information on pollutants emitted.

For the identification and measurement of atmospheric pollutants in the Cement Area, some parameters are measured with analysers calibrated according to the UNE-EN 1481 standard (particles, SO₂, NOX, CO, NH₃, TOC, HCL, etc.), while others are measured periodically by an OCA using certified methodologies. All data on cement activity in Spain are reported to the European pollutant register (E-PRTR) and are verified by each autonomous community.

Currently, the Inmocemento Group has not accounted for the amount of microplastics generated and used in 2024 (E2-4_05, E2-4_06, E2-4_07).

Substances of concern and substances of very high concern


Total quantity of substances of concern and substances of very high concern

The amount of substances of concern and SVHC used in 2024 (E2-5_01, E2-5_02, E2-5_03, E2-5_04, E2-5_05, E2-5_06, E2-5_07) is currently not accounted for by the Inmocemento Group.


Targets related to pollution

With the aim of minimising pollution and promoting sustainable management, a series of specific goals are defined to measure, evaluate and optimise environmental performance, in line with the Inmoco Group's commitment to environmental protection, continuous improvement and the development of sustainable solutions.

The most important commitments relating to the reduction of pollution from the Cement Area are identified below:

Area	Target
 Cement	Atmospheric pollution: <ul style="list-style-type: none">- Improving the NOx abatement system in Olazagutía. Spills and discharges: <ul style="list-style-type: none">- Achieve zero spills of hazardous substances in any of the factories.

The quantifiable target established to manage the impacts detailed in indicator SBM-3, relating to the reduction of pollution, is indicated and described below. It is also specified in more detail in Appendix IV: Targets related to environmental management

Area	Target	Short description
 Cement	Reduction of dust emissions to the outside, improving air quality in the environment.	Voluntary target to reduce the number of complaints about particulate matter emissions into the environment

ESRS E3 - Water and marine resources

Growing concerns about water scarcity are intensifying in the face of the impacts of climate change. This phenomenon not only compromises the availability of a fundamental resource, but also increases the risk of drought and amplifies water stress situations, directly affecting the quality of life in communities. Beyond its vital role for survival, water plays a central role in the balance of biodiversity, food production and economic development. In this critical scenario, responsible water management becomes an essential pillar to mitigate the adverse effects of scarcity and promote sustainable use.

For this reason, the Inmocermento Group promotes, through its two business areas, the efficient use of water resources, and aims to provide solutions, reducing water stress in the areas in which it operates.

Material impacts, risks and opportunities

The conclusions obtained from the Inmocermento Group's double materiality analysis, in relation to water and marine resource issues, are set out below. Considering that this is the first year that information is reported in accordance with the ESRS, no trends are presented with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis carried out, and in relation to water and marine resources, the Inmocermento Group has identified the following material impacts on stakeholders.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Water consumption and withdrawals			
(I-E3.1) Increased water stress as a consequence of water consumption in own operations.	Cement	CU	OP
(I-E3.2) Increased water stress due to water consumption in the upstream value chain.	Cement Real estate	CU	UVC
Water discharges			
(I-E3.3) Impact on water bodies as a result of the generation of wastewater in operations.	Cement	CU	OP

* Issue dealt with by specific organisational issues.

CU: Current
ST: Short term
MT: Medium term
LT: Long term

OP: Own operations
UVC: Upstream value chain
DVC: Downstream value chain

Financial materiality

The Inmocemento Group has not identified any material risks or opportunities to manage in terms of water and marine resources.



The above impacts are mainly due to water consumption, discharges and unsustainable use of this resource, in addition to the increase in water stress as a result of the activities carried out in the Inmocemento Group, based on the framework of its business model (SBM-3_05). Aware of the effects of its impacts, the business areas that make up the Inmocemento Group have implemented measures over the years to mitigate their effects, both on the company and its stakeholders. Therefore, although they are related to the Group's strategy and business model, it is not considered necessary to update these elements for impact management (SBM-3_03, SBM-3_10).

Policies related to water and marine resources

Concerns about water scarcity are increasing due to the effects of climate change, which not only affects water availability, but also aggravates the risk of droughts and generates higher levels of water stress. In this context, proper water management becomes crucial to reduce the negative impacts of water scarcity and ensure its responsible use.

The Inmocermento Group makes reducing consumption and protecting water and marine resources a priority. Therefore, policies are developed to manage the impacts linked to water and marine ecosystems, as indicated in indicator SBM-3. Through these policies, the Inmocermento Group seeks to reaffirm its commitment to sustainability through environmental management focused on protecting natural resources, especially water, by optimising its efficient use, implementing measures to reduce its consumption and taking advantage of advanced technologies for its treatment and reuse (MDR-P_01).

The following is a list of the policies of the Cement and Real Estate Areas related to water resources and the main aspects they cover, establishing the commitments and general principles of action applicable to the business areas. These policies are developed in more detail in Appendix II: Policies related to environmental management.

Area	Policy	Aspects covered		
		Water management (E3-1_01, E3-1_02, E3-1_03, E3-1_04)	Product and service design (E3-1_05)	Consumption in water-stressed areas (E3-1_06)
 Cement	Environmental and Energy Policy	✓		
 Real estate	Sustainability Policy	✓	✓	✓

Actions related to water and marine resources

Controlling water consumption is of crucial importance given the essential nature of this resource and the challenges related to its scarcity. Aware of this premise, the two business areas implement measures aimed at mitigating the adverse impacts of activities that generate significant water consumption, thus contributing to the preservation of water resources.

The figure below details the main activities where there is most interaction with water, as well as the measures implemented to manage it.

Cement Area

Main water-consuming activities

- Drinking water consumption and catering areas.
- Irrigation of roads and gardens.
- Cooling of equipment, conditioning of gases prior to filtration in bag filters, and for the reduction of diffuse emissions in the quarry area.
- Cleaning activities.

Measures implemented

- Maintenance and improvement of the water networks of the facilities to avoid losses.
- Exhaustive consumption control.
- Reuse of rainwater.

Real Estate Area


Main water-consuming activities

- Human consumption.
- Garden irrigation.
- Air conditioning.

Measures implemented

- Daily recording of consumption levels and constant monitoring to identify and control possible water losses.
- Optimisation of air-conditioning refrigeration systems.
- Implementation in various residential building developments for the reuse of greywater for sanitary purposes.

The action implemented by the Cement Areas during the 2024 financial year (MDR-A_01), focused on managing the impacts related to water resources, detailed in indicator SBM-3, is described below. In Appendix III: Actions related to environmental management, it is developed in more detail.

Area	Action	Short description
 Cement	Waterproofing of coal bunkers	Apply a protective layer on the soil where coal is stored to prevent water and pollutants from seeping into the subsoil, this reduces the impact on the solid fuel (coal, petcoke) storage area (Olazagutía - Spain).

The Real Estate Area has not established actions on water resources (MDR-A_13).

Metrics related to water and marine resources

Water consumption

Considering the material impacts of the Inmocemento Group, the metrics that allow the monitoring of the company's control and management of water resources are set out below.

This section aims to provide detailed information, complying with the disclosure requirements of section E3-4 on water consumption of the ESRs. It includes the consolidation of total water consumption data for both Business Areas, together with the contextual information necessary to understand it.

Water consumption in relation to its own activities

Below, the Inmocemento Group discloses quantitative data on its water consumption during 2024, with the aim of providing a clear understanding of the quantities and progress in relation to the targets set.

Water consumption (m ³)	2024
Total water consumption (m³) (E3-4_01)	825,984
Total water consumption in areas at water risk, including areas of high-water stress (m ³) (E3-4_02)	24,650
Total recycled and reused water (m ³) (E3-4_03)	28,852
Total stored water and changes in storage (m ³) (E3-4_04; E3-4_05)	0

With regard to obtaining information, the Inmocemento Group has mainly relied on direct measurement through invoices or meters (E3-4_06, E3-4_07).

Water intensity ratio

The water intensity ratio measures the efficiency in the use of water resources, relating the previous water consumption to the net profit (in millions of euros) derived from the activity of the Cement and Real Estate Areas. This indicator allows us to assess the environmental impact and detect opportunities for optimisation in the Inmocemento Group's water management.

Water intensity of own operations (E3-4_08)	2024
Total water consumption (m³)	839,540
Net income (million euros) ^{iError! Marcador no definido.}	944
Water intensity ratio (m ³ /million euros)	889

Targets related to water and marine resources

The Cement and Real Estate divisions have not established quantifiable, results-oriented targets for water and marine resources. Although the Real Estate Area does not monitor the effectiveness of its policies and actions, the Cement Area has implemented a measurement control of this resource that contributes to monitoring the effectiveness of its action (E3-3_01, E3-3_02, E3-3_03, MDR-T_14, MDR-T_15, MDR-T_16, MDR-T_17, MDR-T_18, MDR-T_19).

ESRS E4 - Biodiversity and Ecosystems

Biodiversity, a fundamental pillar for the balance and health of the planet, is currently facing critical challenges that threaten its preservation. Problems such as pollution, deforestation, climate change and overexploitation of natural resources are accelerating the disappearance of species and threatening the stability of ecosystems, with direct consequences on key aspects of life, such as food availability, climate regulation and access to quality water.

In this scenario, the Inmoco Group assumes its commitment to the protection of ecosystems and the conservation of biodiversity by recognising the activities that can have an impact on natural environments and integrating measures that prioritise sustainability and the preservation of the environment for present and future generations.

Material impacts, risks and opportunities

The conclusions obtained from the Inmoco Group's double materiality analysis in relation to biodiversity and ecosystems are set out below. Considering that this is the first year that information is reported in accordance with the ESRS, there are no trends with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis, and in relation to biodiversity and ecosystems, the impacts that have been material to stakeholders are identified below.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Drivers of the direct impact of biodiversity loss			
(I-E4.1) Impact on biodiversity (biotic and abiotic factors) as a result of the location and occupation of facilities, buildings and works.	Cement	CU	OP
(I-E4.2) Alteration of habitats and ecosystems as a consequence of quarrying and gravel extraction.	Cement	CU	OP
Impacts and dependencies of ecosystem services			
(I-E4.3) Protection of ecosystems resulting from the establishment of agreements with nature protection associations.	Cement	CU	OP
* Issue dealt with by specific organisational issues.		CU: Current ST: Short term MT: Medium term LT: Long term	OP: Own operations UVC: Upstream value chain DVC: Downstream value chain

Financial materiality

Based on the double materiality analysis carried out, no material risks and opportunities are identified with regard to biodiversity and ecosystems.

With regard to the impacts of the previous section, these result from the impact on biodiversity due to the occupation of infrastructures, the exploitation of resources and, in addition, the promotion of the preservation and protection of ecosystems through agreements and the active management of habitats. All of this is a consequence of the activities carried out in the Cement Area, based on the framework of its strategy and business model (SBM-3_05). Aware of the effects of its impacts, over the years the Cement Area has implemented measures to mitigate their effects, both on the company and its stakeholders. Therefore, although they are related to the strategy and the business model, it is not considered necessary to update these elements for impact management (SBM-3_03, SBM-3_10).

Given the activity carried out by the Real Estate Area, no material impacts, risks or opportunities related to biodiversity and ecosystems have been identified, so the standard does not represent a material aspect for this business. Therefore, this chapter does not describe the policies, actions and objectives established by this area.

In this regard, and in order to reflect the Inmoco Group's implications on biodiversity and ecosystems, the following details how transparency is managed with respect to the material impacts related to this matter and its interaction with the business model, providing key information on material sites, activities that negatively impact sensitive areas, land degradation and its impact on endangered species.

Area	Location (E4.SBM-3_01, E4.SBM-3_03)	Activity (E4.SBM-3_02)	Nearby sensitive areas (SBM-3_04)
Cement	Els Monjos Quarry	Marl extraction	Serres del Litoral central - Natura 2000 Network
Cement	Vallcarca Quarry	Aggregate extraction	Parc El Garraf- Natura 2000 Network
Cement	Olérdola	Aggregate extraction	Foix PEIN - Natura 2000 network
Cement	El Porcal	No activity	Southeast Regional Park - Nature 2000 Network


For the Cement Area no material negative impacts with respect to soil degradation, desertification or soil sealing have been identified nor are there any operations affecting endangered species (E4.SBM-3_05, E4.SBM-3_06).

The Inmoco Group has not developed an analysis of the resilience of the business model in relation to biodiversity and ecosystems (E4-1_01, E4-1_02, E4-1_03, E4-1_04, E4-1_05, E4-1_06).

Policies related to biodiversity and ecosystems

The Cement Area recognises the urgency of protecting biodiversity and ecosystems, therefore, being aware that its activities can have an impact on natural environments, the company reinforces its commitment to the conservation of natural capital, which is manifested in the commitments it has made. Through its policy it demonstrates a firm commitment to biodiversity and ecosystems, focusing on managing the impacts indicated in indicator SBM-3 (MDR-P_01). Through responsible use of natural resources and compliance with applicable regulations, it seeks to transform activities towards more responsible models, promoting sustainable and environmentally friendly practices (MDR-P_01).

The Cement Area's policy and the main aspects it covers related to biodiversity and ecosystems are set out below, establishing the commitments and general principles of action applicable to the Area. Appendix II: Policies related to environmental management develops this policy in more detail.

Area	Policy	Aspects related to					
		Drivers of biodiversity loss and their impacts on ecosystems (E4-2_01)	Material impacts (E4-2_02)	Material dependencies, risks and opportunities (E4-2_03)	Traceability in the value chain (E4-2_04)	Production, stocks and consumption (E4-2_05)	Social consequences (E4-2_06)
 Cement	Environmental and Energy Policy	✓	✓	✓			

The Cement Area has not adopted specific practices or policies covering owned, leased or managed operating sites in a sensitive area, sustainable use of land and marine resources, or measures to address deforestation (E4-2_17, E4-2_18, E4-2_19, E4-2_20).

Actions related to biodiversity and ecosystems


The conservation and maintenance of biodiversity and ecosystems is of crucial importance given their centrality to the stability of ecosystems and other environmental aspects essential for life.

The measures taken to mitigate the impacts associated with biodiversity and ecosystems by the different business lines are detailed below:

Cement Area

- Repair of soil morphology.
- Revegetation of harvested areas by applying appropriate planting and planning techniques and using indigenous species.
- Establishment of agreements with nature protection associations.

Likewise, the main actions implemented by the Cement Area during the 2024 financial year (MDR-A_01), focused on managing the impacts related to biodiversity and ecosystems, detailed in indicator SBM-3, are described below. These are developed in more detail in Appendix III: Actions related to environmental management.

Area	Action	Short description
 Cement	Method of operation - simultaneous restoration	Establishment of a method of exploitation and immediate restoration in the Porcal, which allows the recovery of the environment and the control of potential dangers that could damage nature, fauna or vegetation (Madrid - Spain).
	El Porcal Environmental Classroom	Educational initiative designed to raise awareness and educate about the importance of sustainability and environmental protection and care for biodiversity in El Porcal (Madrid - Spain).

Metrics related to biodiversity and ecosystems

Considering the impacts related to biodiversity and ecosystem change, the following metrics are used to monitor the Inmocemento Group's control and management in these areas.

This section aims to provide detailed information in compliance with the disclosure requirements of ESRS section E4-5 on biodiversity and ecosystems. It includes the consolidation of biodiversity impact data for the Business Areas, together with the contextual information necessary to understand it.

Sites in sensitive areas

In compliance with CSRD disclosure requirements, an assessment has been carried out to identify biodiversity sensitive areas that may be adversely affected by the Inmocemento Group's operations. As a result of this assessment, sites located within or near protected areas or key biodiversity areas have been identified.


The number of sites identified as being close to sensitive areas and their size in hectares, including land within the Cement Area, is shown below.

Sites located within or near protected areas or key biodiversity areas	No. of sites (E4-5_01)	Area of sites (hectares) (E4-5_02)
Owned sites	2	323
Leased sites	0	0
Sites managed	0	0
Total sites	2	323

The Cement Area contributes directly to the impact factors related to land use change, freshwater and/or sea by mining operations. It is expected that more detailed metrics can be provided for some projects in the future (E4-5_04).

Targets related to biodiversity and ecosystems

The following is the measurable target established that reflects the Cement Area's willingness to manage the impacts described in indicator SBM-3, relating to biodiversity and ecosystems. It is also specified in more detail in Appendix IV: Targets related to environmental management.

Area	Target	Short description
 Cement	Increasing biodiversity initiatives with stakeholders	Disseminate environmental and energy principles to stakeholders, promoting communication and supporting the implementation of good environmental and energy practices.

ESRS E5 - Resource use and circular economy

For decades, the global economy has been dominated by a linear model based on extraction, production and waste, which has led to significant environmental impacts, including climate change and the depletion of natural resources. Given this reality, the transition to this model is key to reducing environmental pressure, securing raw material supplies, fostering innovation, employment and competitiveness. However, it faces challenges such as changing consumer behaviour and the need for multi-level governance.

Based on this, the Inmoco Group promotes the application of circularity principles in various sectors and faced with the impact of resource depletion in its operations, is committed to this model to make efficient use of resources and transform waste into resources.

Material impacts, risks and opportunities

The conclusions obtained from the Inmoco Group's double materiality analysis in relation to the use of resources and the circular economy are set out below. Considering that this is the first year that information is reported in accordance with the ESRS, there are no trends with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis, and in relation to the use of resources and the circular economy, the impacts that have been material for stakeholders are identified below.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Resource inflows, including resource use			
(I-E5.1) Depletion of natural resources due to the extraction of raw materials in operations	Cement	CU	OP
(I-E5.2) Reduction of the consumption of natural resources through the reuse and recovery of industrial waste and by-products.	Cement	CU	OP
* Issue dealt with by specific organisational issues.		CU: Current ST: Short term MT: Medium term LT: Long term	OP: Own operations UVC: Upstream value chain DVC: Downstream value chain

Financial materiality

In addition, based on the double materiality analysis, the material risks and opportunities for the business areas that must be managed in terms of resource use and circular economy, and which have proven to be material for stakeholders, are identified below.

Risk/opportunity (SBM-3_02)	Type	Area	Financial effects (SBM-3_08, SBM-3_09)	Location (SBM-3_02)
Resource inflows, including resource use				
(F-E5.1) Increase in consumption of secondary materials and additions.	O	Cement	Reduction of CO ₂ emissions by reducing the proportion of clinker in cements, improving the sustainability and competitiveness of the product. (M)	OP
Waste				
(F-E5.2) Increased valorisation of biomass fuels.	O	Cement	The energy recovery of waste and the use of biomass fuels enable the reduction of CO ₂ emissions associated with the company's production.	OP
<p>* Issue dealt with by specific organisational issues.</p> <p>R: Risk O: Opportunity</p> <p>M: Possible materialisation in the short term</p> <p>OP: Own operations UVC: Upstream value chain DVC: Downstream value chain</p>				




The impacts identified come mainly from the increase in the extraction of natural resources in the Cement Area. On the other hand, the opportunities derive from the increase in the consumption of secondary materials and additives and the valorisation of biofuels, promoting a more sustainable model. All of this is a consequence of the activities carried out in the area, based on the strategic framework and its business model (SBM-3_05). Aware of the effects of its impacts and opportunities, over the years the Cement Area has implemented measures to mitigate their effects, both on the company and its stakeholders. Therefore, although they are related to the strategy and the business model, it is not considered necessary to update these elements for the management of impacts and opportunities (SBM-3_03, SBM-3_10).

Given the activity carried out by the Real Estate Area, no material impacts, risks and opportunities related to the use of resources and the circular economy have been identified, so this is not a material aspect for this business. Therefore, this chapter does not describe the policies, actions and objectives established by this area.

Policies related to resource use and circular economy

In order to efficiently manage aspects related to the use of resources and the circular economy, the Cement Area has made strategic commitments that are reflected in its policy. This policy focuses on optimising the use of natural resources, promoting efficiency in the use of materials and reducing dependence on non-renewable resources.


The Cement Area's policy and the main aspects it covers, focused on managing the impacts and opportunities related to the use of resources and circular economy, detailed in indicator SBM-3 (MDR-P_01), are set out below. These aspects are addressed through the establishment of commitments and general principles. Appendix II: Policies related to environmental management develops this policy in more detail.

		Aspects covered	
Area	Policy	Use of recycled materials (E5-1_01)	Sustainable supply (E5-1_02)
 Cement	Environmental and Energy Policy		


Actions related to resource use and circular economy

To address resource management efficiently, the Cement Area has established clear commitments that are reflected in its policy, which is oriented towards sustainability and the responsible use of resources. These commitments have been translated into concrete actions designed to reduce environmental impact, optimise resource consumption and promote sustainable practices.

The measures related to the circular economy and the main waste generated are detailed below:

Area	Related aspect	Measures
 Cement	Promoting the circular economy	<ul style="list-style-type: none"> - Energy and material recovery of waste. - Use of alternative fuel sources (e.g. sludge or plant biomass). - Use of secondary raw materials (e.g. ash, construction waste, sludge) to avoid extraction of mineral resources.
	Efficient consumption of resources	<ul style="list-style-type: none"> - Use of alternative resources derived from the recovery of materials, both from the company itself and from other entities, such as fly ash, blast furnace slag and foundry sands. - Use of waste with energy content as fuel for clinker kilns.
	Waste generation and management	<ul style="list-style-type: none"> - Development of staff awareness campaigns. - Segregation and recovery of waste for use as raw material. - Reuse of waste from the production process.
	Main waste generated <ul style="list-style-type: none"> - Derived from the maintenance activities of the installations. - Final product packaging 	

The main actions implemented by the Cement Area during the 2024 financial year (MDR-A_01), focused on managing the impacts and opportunities related to the use of resources and circular economy, detailed in indicator SBM-3, are listed and described below. Likewise, in Appendix III: Actions related to environmental management, they are developed in more detail.

Area	Action	Short description
 Cement	Replacing petroleum-based fossil fuel in clinker kilns with alternative fuels	Achieve a significant reduction in the use of fossil fuels by replacing their use with fuels derived from waste or by-products. The use of petroleum-derived material will be reduced and energy resources that would otherwise be landfilled will be harnessed.
	Substitute natural raw materials in the manufacture of clinker and cement with waste and/or by-products.	Achieve a significant reduction in the use of natural raw materials by substituting their use with alternative raw materials, derived from waste or by-products.

Metrics related to resource use and circular economy

Considering the material impacts and opportunities of the Inmocermento Group, below are the metrics that allow us to understand the use of resources.

This section aims to provide detailed information in compliance with the disclosure requirements of ESRS resource inflows section E5-4. Metrics are included along with the methodologies used for measurement and data collection.

Resource inflows

The following is an overview of the Cement Area's material resource inflows information. This includes resources such as products and materials, energy and fuels in the Area's own operations and along its upstream value chain (E5-4_01).³

Category	Materials
Chemicals	Fly ash, blast furnace slag.
General Materials	Cement sacks, plastic coils, pallets, cartons.
Energy and Fuels	Biomass, petroleum coke, coal.
Waste and Management	Meat meal, pomace, urban waste,

³ Categories aligned as described in AR 21. of E5-4 *Resource inflows*.

Materials used

Understanding the typology of the Cement Area's resource inflows, data related to the materials used to manufacture products and provide services in 2024 are reported below, expressed in tonnes or kilograms according to the following criteria.

Resource input	Quantity
Total weight of technical and biological products and materials used (E5-4_02)	8,718,598
Percentage of bio-based materials used to manufacture the company's products and services that are from sustainable sources (E5-4_03)	2%
Absolute weight of reused or recycled secondary components, secondary intermediates and secondary materials used to produce the company's products and services (including packaging) (E5-4_04)	373,463
Weight, as a percentage, of secondary components reused or recycled, secondary intermediates and secondary materials used to manufacture the company's products and services (E5-4_05)	5%

The reported data have been obtained by direct measurements using weighbridges (E5-4_06).

Resource outflows

Considering the material opportunities of the Inmocemento Group, the metrics that allow us to understand the outflow of resources are presented below.

This section aims to provide detailed information, complying with the disclosure requirements of ESRS resource output section E5-5. Metrics are included together with the methodologies used for measurement and data collection.

Resulting products and materials

In the Cement Area, where the output of resources is a material issue, the production process generates a variety of products and by-products under circular economy principles. In addition, recycled materials and sustainable alternatives are incorporated in manufacturing, optimising the use of resources and reducing waste (E5-5_01).

The key products and materials resulting from the production process and designed according to the circular principles are listed below.

Area	Products and materials
Cement	All cements include a proportion of recycled materials in their manufacture through the use of alternative fuels.

Resource outflows

This table represents the required information on **resource outflows** that are material. The following key aspects have been identified and reported:

- **Expected durability of products:** The durability of the products marketed by the company compared to the industry average for each product group is analysed.
- **Repairability of products:** Whenever possible, an assessment of the repairability of products is included.
- **Recyclable content:** Recyclable content rates are indicated for both products and their packaging.

2024	Cement
Expected durability of marketed products (in relation to the industry average for each product group) (E5-5_02)	Concrete is the main derivative of cement and has an approximate durability of >50 years.
Product reparability (E5-5_03)	Not applicable
% of recyclable content in products and their packaging (E5-5_04) (E5-5_05)	Data not available

Information on the methodology or main assumptions used is not available (E5-5_06).

Waste generated

Below is a table showing the total amount of waste generated in Grupo Inmocermento's operations, expressed in tonnes.

Waste generated (E5-5_07)	Quantity
Quantity of hazardous waste	172
Quantity of non-hazardous waste	7,461
Total waste generated	7,633

In order to address the total amount of waste whose disposal has been avoided, a distinction is made between hazardous and non-hazardous waste and broken down according to recovery operations.

Wastes destined for recovery operations (E5-5_08)	Quantity
Hazardous waste (tonnes)	
Hazardous waste destined for preparation for re-use	105
Recycled hazardous waste	10
Hazardous waste destined for other recovery operations	12
Total hazardous waste destined for recovery operations	127
Non-hazardous waste (tonnes)	
Non-hazardous waste destined for preparation for re-use	2,623
Recycled non-hazardous waste	1,477
Non-hazardous waste destined for other recovery operations	1,080
Total non-hazardous waste destined for recovery operations	5,180

The following table shows the total amount by weight of waste destined for disposal, differentiating between hazardous and non-hazardous waste, according to the type of treatment.

Wastes destined for disposal (E5-5_09)	Quantity
Hazardous waste (tonnes)	
Hazardous waste disposed of by incineration	1
Hazardous waste destined for landfill	21
Hazardous waste destined for other disposal operations (tonnes)	23
Total hazardous waste destined for disposal	45
Non-hazardous waste (tonnes)	
Non-hazardous waste disposed of by incineration	0
Non-hazardous waste destined for landfill	1,901
Non-hazardous waste destined for other disposal operations	379
Total non-hazardous waste destined for disposal	2,281

The total amount and percentage of waste not recycled during the financial year 2024 are expressed in the following table.

Non-recycled waste	Quantity
Total non-recycled waste (E5-5_10) (tonnes)	337
% of waste not recycled (E5-5_11)	4%

Hazardous and radioactive waste poses unique risks to human health and the environment. Their safe management is crucial due to their potential to cause long-term damage. Below, the Inmocemento Group presents the total amount of hazardous and radioactive waste generated throughout 2024, as defined in **Council Directive 2011/70/Euratom**.

Hazardous and radioactive wastes as defined in Council Directive 2011/70/Euratom (tonnes)	Quantity
Total hazardous waste generated (E5-5_15)	172
Total radioactive waste generated (E5-5_16)	0


Regarding the methodologies used for the Cement Area, cement factories in Spain use direct measurements. Non-hazardous waste is weighed at the facilities using approved scales, while hazardous waste is sent to a waste manager, who carries out the weighing and invoices accordingly. In Tunisia, the calculation of waste generated in the operations themselves (E5-5_17) is based on the history of waste recovered and sold, using the weights recorded on the factory scale, which is calibrated by a national body.

The company produces a wide variety of waste from the cement sector, including metals, biomass, plastics, wood and sanitary waste (E5-5_12) (E5-5_13). The materials present in this waste include metals, biomass, plastics, wood and sanitary waste, among others (E5-5_14).

Targets related to resource use and circular economy

The Area reaffirms its strategic commitment, promoting a business model that prioritises the circular economy through the efficient management of resources and waste, as well as the extension of the useful life of materials.

The following details the measurable target established that reflect the will to manage the impacts and opportunities described in indicator SBM-3, relating to the use of resources and circular economy. Similarly, in Appendix IV: Targets related to environmental management, it is specified in more detail.

Area	Target	Short description
 Cement	Increasing the substitution of fossil fuels by alternative fuels	Achieve 70% energy substitution in clinker kilns with alternative fuels by 2030.

Other information related to environmental management

Appendix II: Policies related to environmental management

Below are all the policies related to the environmental management of the Inmocermento Group and its business areas, which comply with the criteria established by the ESRS, corresponding to ESRS E1 Climate Change, ESRS E2 Pollution, ESRS E3 Water and marine resources, ESRS E4 Biodiversity and ecosystems and ESRS E5 Use of resources and circular economy.

Inmocermento Group

Sustainability Policy

Scope (MDR-P_02)	Applicable to the Inmocermento Group
Responsible (MDR-P_03)	Inmocermento's Board of Directors supervises compliance with this policy through the Audit and Control Committee.
References (MDR-P_04)	Agenda 2030, the Green Deal, the Climate Change and Energy Transition Act, the Circular Economy Action Plan, the EU Green Deal, the European Biodiversity Strategy 2030, the 2015 Paris Agreement, the Organisation for Economic Co-operation and Development (OECD), the United Nations and its Agencies, the Global Compact, the International Labour Organisation (ILO) and the Universal Declaration of Human Rights Framework.
Stakeholders (MDR-P_05)	Dialogue through various channels of communication and different avenues of engagement with stakeholders in order to engage in a transparent, honest, truthful and consistent manner, and as a means to learn and improve business performance. The Sustainability Policy is inherent to the commitment and actions of all the members of the Group, in line with the demands of customers and society as a whole.
Availability (MDR-P_06)	They are available to all staff and stakeholders on the Inmocermento website, as part of the Corporate Governance regulations.

Cement Area

Environmental and Energy Policy⁴

Scope (MDR-P_02)	Cement plants in Spain, including associated quarries and mortar plants in El Alto and Mataporquera (Dericem). Tunis Cement Plant.
Responsible (MDR-P_03)	Spain Operations Directorate of the Cement Area.
References (MDR-P_04)	<ul style="list-style-type: none"> – European EMAS Regulation – ISO 9001 – ISO 14001 – ISO 45001 – ISO 50001
Stakeholders (MDR-P_05)	The interests of stakeholders, identified through regular meetings of the CASA (Autonomous Monitoring Commission) and the CEMA Foundation, environmental trade union delegates, and monitoring commissions with local and regional administration, have been considered in the development of the Mercado España policy.
Availability (MDR-P_06)	Publicly accessible through the official Cementos Portland Valderrivas Group website, as well as on notice boards in common areas and published Environmental Statements.

⁴ The Environmental and Energy Policy applicable to the Spanish cement plants and the Environmental Policy applicable to the Tunisian operations are included.

In the Cement Area there are no centres located in areas at high risk of water stress, and therefore no actions are carried out in these areas (E3-1_07, E3-2_03).

Real Estate Area

Sustainability Policy

Scope (MDR-P_02)	In the territory of Spain, specifically, in all the activities of the Realia Group and the companies that comprise it, taking into account the significant impact on the value chain.
Responsible (MDR-P_03)	Board of Directors of the Real Estate Area Activity.
References (MDR-P_04)	<ul style="list-style-type: none"> – BREEAM certification scheme. – Passive Haus.
Stakeholders (MDR-P_05)	Stakeholders' interests have not been considered in the development of this policy.
Availability (MDR-P_06)	Publicly accessible through Realia's official website.

In the Real Estate Area there are no centres located in areas at high risk of water stress (E3-1_07), and no actions have been taken in these areas (E3-2_03).

Appendix III: Actions related to environmental management

The following are those actions related to environmental management that comply with the criteria established by the ESRS, broken down by subject and by business area according to materiality.

ESRS E1 - Climate Change

Cement Area

Reducing the use of fossil fuels in clinker kilns

Key actions (MDR-A_01) (E1-3_01) (E1-3_03) (E1-3_03) (E1-3_04)	<p>The Cement Area, through the ongoing action to reduce the use of fossil fuels in clinker kilns, aims to achieve 70% thermal substitution through the use of alternative fuels by 2030.</p> <p>This mitigation measure contributes to the achievement of the Area's objectives by reducing dependence on fossil fuels, through the valorisation of waste as alternative fuels, and promoting the use of clean energy. It is not considered a nature-based solution.</p>
Scope (MDR-A_02)	This Cement Area action applies to the following cement factories in Spain: El Alto, Alcalá de Guadaira, Monjos, Mataporquera, Olazagutía, Hontoria.
Time horizon (MDR-A_03)	This action is projected to the year 2030.
Impact Remediation (MDR-A_04)	The action aims to remedy negative impacts on the environment by minimising the extraction of natural resources and reducing greenhouse gases (GHG).
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Resource Dependency for Action (E1-3_05)	This action has no significant dependence on the availability and allocation of resources for its implementation.
Relationship with Taxonomy (E1-3_06) (E1-3_07) (E1-3_08)	This action is aimed at meeting future taxonomy alignment requirements.

Reduction of CO₂ emission ratio per tonne of cement

Key actions (MDR-A_01) (E1-3_01) (E1-3_03) (E1-3_03) (E1-3_04)	<p>The ongoing action aims to reduce the ratio of CO₂ emissions per tonne of cement, with the target of reaching a value of less than 0.540 kg CO₂/tonne of cement. The implementation of this measure contributes to the achievement of the Area's objectives, focusing on the mitigation of global warming by reducing the use of fossil fuels, substitution of alternative fuels and raw materials. This measure is not considered a nature-based solution.</p>
Scope (MDR-A_02)	This Cement Area action applies to the following cement plants in Spain: El Alto, Alcalá de Guadaira, Monjos, Mataporquera, Hontoria and Olazagutía.
Time horizon (MDR-A_03)	This action is projected to the year 2030.
Impact Remediation (MDR-A_04)	The action aims to remedy negative impacts on the environment by minimising the extraction of natural resources and reducing greenhouse gases (GHG).
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Resource Dependency for Action (E1-3_05)	This action is not significantly dependent on the availability and allocation of resources for its implementation. It is expected to be implemented with its own cash and access to state and European subsidies.

Relationship with Taxonomy (E1-3_06 E1-3_07 E1-3_08)	This action is aimed at meeting future taxonomy alignment requirements.
Reducing the carbon footprint through renewable energy procurement	
Key actions (MDR-A_01) (E1-3_01) (E1-3_03) (E1-3_03) E1-3_04)	The ongoing action consists of the procurement of renewable energy, with the target of reaching 80% of renewable energy procurement. This action contributes to climate change mitigation by reducing Scope 2 GHG emissions. It also supports the achievement of the Area's objectives and policies by reducing the risk of energy cost overruns and fostering the decarbonisation of the supply chain. The decarbonisation levers of this action include the use of renewable energy and the decarbonisation of the supply chain. It is not a nature-based solution.
Scope (MDR-A_02)	This Cement Area action applies to the following cement factories in Spain: El Alto, Alcalá de Guadaira, Monjos, Mataporquera, Hontoria, Olazagutía.
Time horizon (MDR-A_03)	This action is projected to the year 2030.
Impact Remediation (MDR-A_04)	The action aims to remedy negative impacts on the environment by reducing greenhouse gases (GHG).
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Resource Dependency for Action (E1-3_05)	This action has no significant dependence on the availability and allocation of resources for its implementation.
Relationship with Taxonomy (E1-3_06 E1-3_07 E1-3_08)	This action is not included in the KPIs reported according to the EU Environmental Taxonomy.

Real Estate Area

BREEAM Office Building Portfolio Certification in Use

Key actions (MDR-A_01) (E1-3_01) (E1-3_03) (E1-3_03) E1-3_04)	The action, currently underway, consists of certification in the voluntary BREEAM Sustainability scheme in use for all the buildings in the <i>portfolio</i> managed by the Real Estate Area. The certification consists of the assessment of each building in 10 different categories, which within those topics address factors such as carbon emissions and energy efficiency. This climate change adaptation action seeks to ensure the continuous improvement of the buildings they manage, and alignment with the sustainability objectives set by the Area. It is not considered a nature-based solution.
Scope (MDR-A_02)	The action applies to the office buildings under management, the service providers of these buildings and the tenants occupying the <i>portfolio</i> . The buildings subject to the action are mainly located in Madrid (21), Barcelona (1) and Seville (1).
Time horizon (MDR-A_03)	It is planned to complete this action in the medium term, with a further 6 buildings to be certified by 2025.
Impact Remediation (MDR-A_04)	This action does not provide or cooperate in the remediation of those affected by actual identified material impacts.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Resource Dependency for Action (E1-3_05)	This action has no significant dependence on the availability and allocation of resources for its implementation.
Relationship with Taxonomy (E1-3_06 E1-3_07 E1-3_08)	This action is not included in the KPIs reported according to the EU Environmental Taxonomy.

Digitisation of consumption monitoring in managed buildings

Key actions (MDR-A_01) (E1-3_01) (E1-3_03) (E1-3_04)	The current action consists of real-time monitoring of the consumption of the buildings managed by the Real Estate Area. This measure makes it possible to detect irregularities in consumption, prevent their continuation and promote the mitigation of climate change through energy efficiency, in line with the Area's sustainability objectives. It is not an action based on nature.
Scope (MDR-A_02)	The action applies to office buildings under management and the tenants occupying the portfolio. The buildings subject to the action are mainly located in Madrid (21), Barcelona (1) and Seville (1).
Time horizon (MDR-A_03)	It is planned to complete this action in the medium term, aiming to reach full data coverage by 2028 with the integration of tenants' consumption.
Impact Remediation (MDR-A_04)	This action does not provide or cooperate in the remediation of those affected by actual identified material impacts.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Resource Dependency for Action (E1-3_05)	This action has no significant dependence on the availability and allocation of resources for its implementation.
Relationship with Taxonomy (E1-3_06) (E1-3_07) (E1-3_08)	This action is not included in the KPIs reported according to the EU Environmental Taxonomy.

Replacement of traditional lighting with LED technology

Key actions (MDR-A_01) (E1-3_01) (E1-3_03) (E1-3_04)	The current action consists of replacing traditional lighting with LED technology in the buildings managed by the Real Estate Area. This measure promotes climate change mitigation through energy efficiency and ensures the continuous improvement of the buildings and their alignment with sustainability objectives, since, once the replacement has been carried out, consumption and consequently GHG emissions are reduced. It is not an action based on nature.
Scope (MDR-A_02)	The action applies to office buildings under management and the tenants occupying the portfolio. The buildings subject to the action are mainly located in Madrid (21), Barcelona (1) and Seville (1).
Time horizon (MDR-A_03)	It is planned to complete this action in the medium term, aiming to achieve full data coverage over the next five years.
Impact Remediation (MDR-A_04)	This action provides and cooperates in the remediation of those affected by actual identified material impacts as reducing energy consumptions has a direct positive impact on the tenants and the energy supplier.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Resource Dependency for Action (E1-3_05)	This action has no significant dependence on the availability and allocation of resources for its implementation.
Relationship with Taxonomy (E1-3_06) (E1-3_07) (E1-3_08)	This action is not included in the KPIs reported according to the EU Environmental Taxonomy.

ESRS E2 - Pollution

Cement Area

Improving air quality

Key actions (MDR-A_01)	Ongoing action to reduce the number of complaints about the factory environment due to diffuse emissions. The action contributes to the achievement of the Area's policies and/or objectives through the improvement of air quality.
Scope (MDR-A_02)	These actions apply to all cement plants in Spain.
Time horizon (MDR-A_03)	The Area plans to complete this action by December 2025.
Impact Remediation (MDR-A_04)	The action aims to remedy current impacts on stakeholders by improving air quality in the factory and in the immediate environment.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Value chain commitments (E2-2_02)	This action does not include a commitment related to upstream or downstream stages of the value chain.

ESRS E3 - Water and Marine Resources

Cement Area

Waterproofing of coal bunkers

Key actions (MDR-A_01)	This action, implemented in 2024, consists of applying a protective layer on the soil where coal is stored to prevent water and pollutants from seeping into the subsoil, thus reducing the impact on the solid fuel (coal, petcoke) storage area. The implementation of the action does not contribute to the achievement of Inmoco's policies and/or objectives.
Scope (MDR-A_02)	The action is applied in the coal park of the Olazagutía factory (Navarre-Spain).
Time horizon (MDR-A_03)	The action was completed in 2024.
Impact Remediation (MDR-A_04)	This action does not provide or cooperate in the remediation of those affected by actual material impacts of the company.
Progress (MDR-A_05)	Action reported for the first year under ESRS.

ESRS E4 - Biodiversity and Ecosystems

Cement Area

Method of operation - simultaneous restoration

Key actions (MDR-A_01)	This is an ongoing action whose objective is to monitor potential hazards that could damage nature, fauna or vegetation in the Finca El Porcal (the Group's former gravel pit), included in the Natura 2000 Network and in the catalogue of wetlands of the Community of Madrid. This has been achieved through the implementation of a simultaneous exploitation - restoration method. This situation has allowed the lagoons created and their surroundings to be practically restored by the time the extractive activity was completed. Given the environmental characteristics and the legal conditioning factors at El Porcal, derived from the presence of species of fauna and natural habitats protected by the legislation for the protection of biodiversity and the protection of natural spaces, the use that best suits its current situation is a natural use, aimed at the regeneration and ecological-landscape integration of the estate and the creation of fauna habitats.
Scope (MDR-A_02)	El Porcal, former Gravera del Grupo. It is currently part of the Natura 2000 Network and of the catalogue of wetlands of the Community of Madrid-Spain.
Time horizon (MDR-A_03)	The contract expires annually and can be extended for successive years.
Impact Remediation (MDR-A_04)	The actions aim to remedy the current impacts on stakeholders, the planet, local species and localities, contributing to the protection and conservation of an area within the community of Rivas-Vaciamadrid.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Biodiversity offsets (E4-3_02, E4-3_03, E4-3_04, E4-3_08)	No biodiversity offsets have been used for this action.
Local and indigenous knowledge (E4-3_09)	Given the environmental characteristics and the legal conditions of El Porcal, derived from the presence of species of fauna and natural habitats protected by legislation for the protection of biodiversity and the protection of natural spaces (Regional Park, SCI, SPA), the use that best suits its current situation is a natural use, aimed at the regeneration and ecological-landscape integration of the estate and the creation of wildlife habitats.

El Porcal Environmental Classroom

Key actions (MDR-A_01)	This is an ongoing action whose educational initiative is designed to raise awareness and educate about the importance of sustainability and environmental protection, as well as care for biodiversity. Workshops and educational activities are offered for students and the community at large, with the aim of promoting greater environmental awareness, as well as guided tours, biodiversity conservation projects and talks and lectures.
Scope (MDR-A_02)	El Porcal, former Gravera del Grupo. It is currently part of the Natura 2000 Network and of the catalogue of wetlands of the Community of Madrid-Spain.
Time horizon (MDR-A_03)	Action carried out and renewable annually.
Impact Remediation (MDR-A_04)	Actions are not intended to remedy current impacts on stakeholders.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Biodiversity offsets (E4-3_02, E4-3_03, E4-3_04, E4-3_08)	No biodiversity offsets have been used for this action.
Local and indigenous knowledge (E4-3_09)	Collaboration is being carried out with an NGO (Naumani Naturalist Association) that has a presence in the area.

Cement Area

Replacing petroleum-based fossil fuel in clinker kilns with alternative fuels

Key actions (MDR-A_01)	This is an ongoing action that aims to achieve a reduction in the use of fossil fuels by replacing their use with fuels derived from waste or by-products. It will also reduce the use of petroleum-derived material and make use of energy resources that would otherwise end up in landfills. The use of materials derived from waste reduces fossil CO ₂ emissions and promotes the circular economy.
Scope (MDR-A_02)	These actions apply to the cement plants in Spain: El Alto, Alcalá de Guadaira, Monjos, Mataporquera and Hontoria.
Time horizon (MDR-A_03)	The action is planned for the year 2030, but will continue in subsequent years.
Impact Remediation (MDR-A_04)	The action aims to remedy current impacts on stakeholders by reducing land occupation in landfills and reducing GHG emissions.
Progress (MDR-A_05)	Action reported for the first year under ESRS.

Substitute natural raw materials in the manufacture of clinker and cement with waste and/or by-products.

Key actions (MDR-A_01)	This is an ongoing action that aims to achieve a significant reduction in the use of natural raw materials by replacing their use with alternative raw materials, derived from waste or by-products. The use of natural material will be reduced and mineral resources that would otherwise be landfilled will be utilised. The use of materials derived from waste reduces fossil CO ₂ emissions and promotes the circular economy.
Scope (MDR-A_02)	These actions apply to the cement plants in Spain: El Alto, Alcalá de Guadaira, Monjos, Mataporquera and Hontoria.
Time horizon (MDR-A_03)	The action is projected to 2030.
Impact Remediation (MDR-A_04)	The action aims to remedy current impacts on stakeholders by reducing land occupation in landfills and reducing GHG emissions.
Progress (MDR-A_05)	Action reported for the first year under ESRS.

Appendix IV: Targets related to environmental management

The targets related to environmental management that comply with the criteria established by the ESRS, broken down by subject and by business area according to materiality, are included below.

ESRS E1 - Climate Change

Cement Area

Reduction of CO₂ emissions from process and combustion in grey cement

Target (MDR-T_02, E1-4_02, E1-4_04)				
To obtain a ratio of 0.540 t CO ₂ /t cement				
Type of target (MDR-T_03, E1-4_04)	Reference value (MDR-T_05, E1-4_20)		Unit of measurement (MDR-T_03)	
Relative	0.684		t CO ₂ /t cement	
Base year (MDR-T_06, E1-4_20)	Period of application (MDR-T_07)		Intermediate/interim targets (MDR-T_08)	
2020	2020-2030		No intermediate targets	
% covered Scope 1 (E1-4_07)	% covered Scope 2	% covered Scope 3	Calculation method Scope 2	Type of gases covered (E1-4_18)
100%	-	-	-	CO ₂
Description and relationship with policies (MDR-T_01, E1-4_01)				
This target is related to climate change mitigation management within the Environmental and Energy Policy.				
GHG inventory limit and Scope (MDR-T_04, E1-4_18)				
The target applies only to cement plants in Spain and only for the greenhouse gas CO ₂ . Applies to: Company - Cementos Portland Valderrivas, S.A. Factories (El Alto, Hontoria, Alcalá, Olazagutía, Monjos) Company - Cementos Alfa, S.A. Factory (Mataporquera)				
Scientific basis (MDR-T_10, E1-4_22)				
The target has no scientific basis.				
Climate scenarios (E1-4_22)				
It is not compatible with limiting global warming to 1.5°C.				
Sectoral decarbonisation pathway (E1-4_22)				
The target is not derived using a sectoral decarbonisation pathway, nor has the target been externally secured.				
Decarbonisation levers (E1-4_23, E1-4_24)				
The decarbonisation levers of this target are the use of biomass fuels, use of decarbonised raw materials, use of additions in cement and investments for the improvement of the clinker production process.				
Methodologies (MDR-T_09)				
According to the ETS methodology, kg CO ₂ /t clinker is measured for each plant and kg clinker per tonne of cement by weighting all cements from all plants.				
Stakeholders (MDR-T_11)				
Stakeholders have not been involved in the target setting process.				
Changes (MDR-T_12, E1-4_21)				
No changes in the target or associated metrics have been observed.				

Performance and progress
(MDR-T_13, E1-4_19)

In 2023 the result was 0.659 tCO₂eq. The result for 2024 was 0.651 tCO₂eq (to be verified by an authorised external audit company).
The progress of the targets is monitored through the Environment Department of each cement plant, as well as in the Corporate Sustainability Committee.
Target reported for the first year under ESRS.

Increasing the share of energy purchased from renewable sources

Target
(MDR-T_02, E1-4_02, E1-4_04)

Achieve 80% of purchased energy from renewable sources by 2030

Type of target (MDR-T_03, E1-4_04)		Reference value (MDR-T_05, E1-4_20)		Unit of measurement (MDR-T_03)	
Relative		11		%	
Base year (MDR-T_06, E1-4_20)		Period of application (MDR-T_07)		Intermediate/interim targets (MDR-T_08)	
2020		2020-2030		No intermediate targets	
% covered Scope 1	% covered Scope 2 (E1-4_13)	% covered Scope 3	Calculation method Scope 2 (E1-4_13)	Type of gases covered (E1-4_18)	
-	100%	-	Market-based	CO ₂	
Description and relationship with policies (MDR-T_01, E1-4_01)		The focus is on the medium and long-term procurement of renewable energy through power purchase agreements (PPAs). Agreements and investments with third parties for the supply of wind and photovoltaic energy are promoted.			
GHG inventory limit and Scope (MDR-T_04, E1-4_18)		The target applies to cement plants in Spain and only for the greenhouse gas CO ₂ . Applies to: Company - Cementos Portland Valderrivas, S.A. Factories (El Alto, Hontoria, Alcalá, Olazagutía, Monjos). Company - Cementos Alfa, S.A. Factory (Mataporquera).			
Scientific basis (MDR-T_10, E1-4_22)		The target has no scientific basis.			
Climate scenarios (E1-4_22)		It is not compatible with limiting global warming to 1.5°C.			
Sectoral decarbonisation pathway (E1-4_22)		The target is not derived using a sectoral decarbonisation pathway, nor has the target been externally secured.			
Decarbonisation levers (E1-4_23 E1-4_24)		The decarbonisation levers of this target is the procurement of renewable electricity.			
Methodologies (MDR-T_09)		The methodology consists of purchasing electricity through the electricity trader Fortia, which provides data on the percentage of renewable energy and CO ₂ emissions per kWh. In addition, information from Cementos Portland's PPA contracts is considered.			
Stakeholders (MDR-T_11)		Stakeholders have not been involved in the target setting process.			
Changes (MDR-T_12, E1-4_21)		No change in the target or associated metrics has been observed.			
Performance and progress (MDR-T_13, E1-4_19)		In 2023 the % of renewable energy has been 63.61%. In 2024, the estimated figure is 74.7% (pending the final figure for the annual Fortia mix factor). The data is monitored by the operations department and the Group's Sustainability Committee. The information is also externally audited by AENOR in the EINF audit. Target reported for the first year under ESRS.			

Increase the percentage of thermal substitution of fossil fuels by alternative fuels

Target (MDR-T_02, E1-4_02, E1-4_04)				
Achieve a % thermal substitution of fossil fuels by alternative fuels of >70% by 2030				
Type of target (MDR-T_03, E1-4_04)	Reference value (MDR-T_05, E1-4_20)		Unit of measurement (MDR-T_03)	
Relative	34		%	
Base year (MDR-T_06, E1-4_20)	Period of application (MDR-T_07)		Intermediate/interim targets (MDR-T_08)	
2020	2020-2030		No intermediate targets	
% covered Scope 1 (E1-4_07)	% covered Scope 2	% covered Scope 3	Calculation method Scope 2	Type of gases covered (E1-4_18)
100%				CO ₂
Description and relationship with policies (MDR-T_01, E1-4_01)	This target is related to climate change mitigation management within the Environmental and Energy Policy.			
GHG inventory limit and Scope (MDR-T_04, E1-4_18)	The target applies to Cement plants in Spain and for the greenhouse gas CO ₂ . Applies to: Company - Cementos Portland Valderrivas, S.A. Factories (El Alto, Hontoria, Alcalá, Monjos). Company - Cementos Alfa, S.A. Factory (Mataporquera).			
Scientific basis (MDR-T_10, E1-4_22)	The target has no scientific basis.			
Climate scenarios (E1-4_22)	It is not compatible with limiting global warming to 1.5°C.			
Sectoral decarbonisation pathway (E1-4_22)	The target is not derived using a sectoral decarbonisation pathway, nor has the target been externally secured.			
Decarbonisation levers (E1-4_23, E1-4_24)	The decarbonisation levers of this target include increasing purchases and consumption of alternative fuels, prioritising biomass, as well as investments in facilities to increase the percentage of recovery, storage and metering of these fuels.			
Methodologies (MDR-T_09)	SAP information on purchases of alternative fuels and consumption (inputs, consumption and outputs) and CO ₂ verification report audited by an authorised external auditing company.			
Stakeholders (MDR-T_11)	Stakeholders have not been involved in the target setting process.			
Changes (MDR-T_12, E1-4_21)	No change in the target or associated metrics has been observed.			
Performance and progress (MDR-T_13, E1-4_19)	In 2023 the target result was 32%, in 2024 the result was 33% (pending CO ₂ verifications). Continuous monitoring is carried out at the factories based on the control of fuel consumption. Subsequently, analyses are carried out on each material to control its energy contribution to the process, as well as monthly monitoring reports. The Sustainability Department also monitors the data, in order to report on the status of the target to the Group's Sustainability Committee. Target reported for the first year under ESRS.			

Real Estate Area

Greenhouse gas reduction in managed buildings

<p>Target (MDR-T_02, E1-4_02, E1-4_04)</p> <p>The target is to reduce greenhouse gases by 25% by the year 2030 in the buildings and developments undertaken.</p>				
Type of target (MDR-T_03, E1-4_04)	Reference value (MDR-T_05, E1-4_20)		Unit of measurement (MDR-T_03)	
Relative	-		%	
Base year (MDR-T_06, E1-4_20)	Period of application (MDR-T_07)		Intermediate/interim targets (MDR-T_08)	
2024	2024-2030		No intermediate targets	
% covered Scope 1 (E1-4_07)	% covered Scope 2	% covered Scope 3	Calculation method Scope 2	Type of gases covered (E1-4_18)
100%				-
Description and relationship with policies (MDR-T_01, E1-4_01)	This target follows the strategic line for climate change mitigation.			
GHG inventory limit and Scope (MDR-T_04, E1-4_18)	The target applies to the buildings and developments managed by the Real Estate Area.			
Scientific basis (MDR-T_10, E1-4_22)	The target has no scientific basis.			
Climate scenarios (E1-4_22)	It is not compatible with limiting global warming to 1.5°C.			
Sectoral decarbonisation pathway (E1-4_22)	The target is not derived using a sectoral decarbonisation pathway, nor has the target been externally secured.			
Decarbonisation levers (E1-4_23, E1-4_24)	-			
Methodologies (MDR-T_09)	-			
Stakeholders (MDR-T_11)	Stakeholders have not been involved in the target setting process.			
Changes (MDR-T_12, E1-4_21)	No change in the target or associated metrics has been observed.			
Performance and progress (MDR-T_13, E1-4_19)	<p>This is an action implemented for the first time in 2024, emissions are being measured, once the most significant elements are clear, measures can be taken and evaluated in future years.</p> <p>Target reported for the first year under ESRS.</p>			

Cement Area

Reduction of dust emissions to the outside, improving air quality in the environment.

Target (MDR-T_02, E2-3_09)		
Voluntary target to reduce the number of complaints about particulate matter emissions in the environment		
Type of target (MDR-T_03)	Reference value (MDR-T_05)	Unit of measurement (MDR-T_03)
Absolute	Not available	Not available
Base year (MDR-T_06)	Period of application (MDR-T_07)	Intermediate/interim targets (MDR-T_08)
Not available	2025	<ul style="list-style-type: none"> - Upgrading of main and secondary baghouses - Irrigation of roads - Closing of stockpiles
Description and relationship with policies (MDR-T_01, E2-3_01, E2-3_02, E2-3_03, E2-3_04)	The target is to improve environmental performance, as well as to reduce the number of complaints about the surroundings of the Alcalá de Guadaira and Mataporquera factories due to diffuse emissions. This is related to the mitigation of negative impacts related to air pollution, which is covered in the Environmental and Energy Policy.	
Scope (MDR-T_04)	Applicable to the factories of Alcalá de Guadaira and Mataporquera-Spain.	
Scientific basis (MDR-T_10)	The target has no scientific basis.	
Methodologies (MDR-T_09)	Factories that are located in a close population environment. Communication and interaction activities are carried out with stakeholders.	
Stakeholders (MDR-T_11)	Stakeholders have been involved in the target setting process through regular meetings with nearby stakeholders (schools, neighbourhood associations, etc.). <i>Focus groups.</i>	
Changes (MDR-T_12)	There has been no change in the target or associated metrics.	
Performance and progress (MDR-T_13)	Reception of complaints is channelled through the Environment Department. A control is kept of the number and type of complaints and of the response given by the company with subsequent communication to the local administrations. Target reported for the first year under ESRS.	

ESRS E4 - Biodiversity and Ecosystems

Cement Area

Increasing biodiversity initiatives with stakeholders

Target (MDR-T_02)		
This is a voluntary target to carry out biodiversity initiatives with stakeholders.		
Type of target (MDR-T_03)	Reference value (MDR-T_05)	Unit of measurement (MDR-T_03)
Absolute	2	Number of initiatives
Base year (MDR-T_06)	Period of application (MDR-T_07)	Intermediate/interim targets (MDR-T_08)
2021	2021-2030	8 biodiversity-related initiatives with stakeholders by 2030
Description and relationship with policies (MDR-T_01)	It contributes to the policy objective of disseminating environmental and energy principles to stakeholders, promoting communication and supporting the implementation of good environmental and energy practices.	
Scope (MDR-T_04, E4-4_07)	Raise awareness among stakeholders (employees, schools, associations, etc.) in the Cement Area.	
Scientific basis (MDR-T_10)	The target has no scientific basis.	
Methodologies (MDR-T_09)	There has been no methodology in the definition of the target.	
Stakeholders (MDR-T_11)	Stakeholders have not been involved in the target setting process.	
Changes (MDR-T_12)	There has been no change in the target or associated metrics.	
Performance and progress (MDR-T_13)	In October 2022 an agreement was signed to extend the current agreement signed with the NGO Naumani (Naumani Naturalist Association) in order to carry out the Life Cerceta Pardilla project (Life 19 NAT/ES/000906). Field specialists are available for monitoring. Target reported for the first year under ESRS.	
Ecological thresholds and impact allocations (E4-4_01, E4-4_02, E4-4_03, E4-4_04)	No ecological thresholds or impact allocations were applied in setting the target.	
Frameworks and strategies (E4-4_05)	The target is not based on the Kunming-Montreal Global Biodiversity Framework or the EU Biodiversity Strategy 2030 or related national legislation.	
Relationship with IROs (E4-4_06)	The target relates to the impact on the protection of ecosystems resulting from the establishment of agreements with nature protection associations.	
Biodiversity offsets (E4-4_08)	Biodiversity offsets have not been used to set this target.	
Mitigation hierarchy (E4-4_09)	Avoid creating impacts from the outset.	

ESRS E5 - Resource use and circular economy

Cement Area

Increasing the substitution of fossil fuels by alternative fuels

<p style="text-align: center;">Target (MDR-T_02, E5-3_13)</p> <p>This is a voluntary target that aims to achieve an energy substitution in clinker kilns with alternative fuels of 70%.</p>		
Type of target (MDR-T_03)	Reference value (MDR-T_05)	Unit of measurement (MDR-T_03)
Absolute	34%	% energy substitution
Base year (MDR-T_06)	Period of application (MDR-T_07)	Intermediate/interim targets (MDR-T_08)
2020	2020-2030	-
Description and relationship to policies (MDR-T_01)	This target fulfils the contribution to the reuse of resources and the reduction of the consumption of natural resources.	
Scope (MDR-T_04)	Applicable to cement factories in Spain: El Alto, Alcalá de Guadaira, Monjos, Mataporquera, Hontoria and Olazagutía.	
Scientific basis (MDR-T_10)	The target has no scientific basis.	
Methodologies (MDR-T_09)	European and national climate change and circular economy policies and legislation are pushing towards the substitution of natural materials and greenhouse gas emissions. Cement manufacturing is energy and natural resource intensive, so the industry is focusing on reduction and substitution with alternative materials.	
Stakeholders (MDR-T_11)	Stakeholders have not been involved in the target setting process.	
Changes (MDR-T_12)	There has been no change in the target or associated metrics.	
Performance and progress (MDR-T_13)	<p>Continuous monitoring is carried out from the factories based on the control of fuel consumption. Subsequently, analyses are carried out on each material to control its energy contribution to the process, as well as monthly monitoring reports. In 2024, the % energy recovery was 33%.</p> <p>Continuous monitoring is carried out from the factories based on the control of fuel consumption. Subsequently, analyses are carried out on each material to control its energy contribution to the process, as well as monthly monitoring reports. The Sustainability Department also monitors the data in order to report on the status of the target to the Group's Sustainability Committee. In 2024, the % of energy recovery was 33% (pending CO2 verifications).</p> <p>Target reported for the first year under ESRS.</p>	
Waste hierarchy (E5-3_09)	<p>The wastes taken into account are 100% biomass alternative fuels (meat meal, olive pomace, grape pomace, WWTP sludge, crushed wood, pruning biomass, grape chippings, coffee grounds). And other waste containing some percentage of biomass (RDF, end-of-life tyres (ELT), textile RDF or rubber.</p> <p>Waste hierarchy:</p> <ul style="list-style-type: none"> -Re-use: Re-use of products or their components. -Recycling: Processing waste into new products. -Recovery: Obtaining energy or other resources from waste. -Disposal: Safe final disposal of waste. 	
Resource inflows and outflows (E5-3_01, E5-3_02, E5-3_03, E5-3_04, E5-3_05, E5-3_06, E5-3_07, E5-3_08)	The target is related to resource inflows and outflows, namely increasing the rate of use of circular material (% of waste derived fuels is increased) and minimising primary raw material (the use of petroleum coke, a common fossil fuel in clinker kilns, is decreased).	

Environmental taxonomy of the European Union

Introduction and regulatory framework

The EU Taxonomy is the cornerstone of the EU's sustainable finance framework and an important tool for market transparency. To meet the EU's 2030 climate and energy targets and achieve the objectives of the European Green Deal, it is vital to direct investments towards sustainable projects and activities. To achieve this, a common language and a clear definition of what is sustainable is needed. For this reason, a common classification system for sustainable economic activities, or an **EU Taxonomy** (SMB-1_14), is created as part of the action plan for financing sustainable growth.

The EU Taxonomy allows financial and non-financial companies to share a common definition of economic activities that can be considered environmentally sustainable. This is an EU tool to increase sustainable investment, creating certainty for investors, protecting investors from *greenwashing*, and helping companies to be more environmentally friendly.

The Taxonomy Regulation (EU) 2020/852 of 18 June 2020 amending Regulation (EU) 2019/2088 on sustainability disclosures in the financial services sector establishes a framework to facilitate sustainable investments.

An economic activity shall be considered environmentally sustainable when:

- Substantially contribute to one or more of the six EU environmental objectives:
 - Climate change mitigation.
 - Adaptation to climate change.
 - Sustainable use and protection of water and marine resources.
 - Transition to a circular economy.
 - Pollution prevention and control.
 - Protection and restoration of biodiversity and ecosystems.
- Complies with the technical selection criteria set by the EU.
- Do not cause significant harm to any of the other environmental objectives.
- Comply with minimum social safeguards.

The EU Taxonomy Regulation is complemented by **Delegated Regulations** setting out the technical selection criteria for environmentally sustainable activities, their contribution to environmental objectives and the methodology for the dissemination of information. So far, the following **delegated regulations** have been published, starting with the most recent one:

- **Delegated Regulation (EU) 2023/2486** of 27 June 2023 (Delegated Environment Act). Sets out the conditions for an economic activity to make a substantial contribution to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to the prevention and control of pollution, or to the protection and restoration of biodiversity and ecosystems. It amends delegated regulation (EU) 2021/2178 on disclosure of information.
- **Delegated Regulation (EU) 2023/2485** of 27 June 2023 amending the Climate Delegated Act (EU) 2021/2139.

- **Delegated Regulation (EU) 2022/1214** of 9 March 2022 (Supplementary Delegated Act on Climate) extending eligible activities to include activities related to nuclear energy and gaseous fossil fuels for electricity generation or heating/cooling systems for district heating and cooling.
- **Delegated Regulation (EU) 2021/2178** of 6 July 2021 (Delegated Disclosure Act) specifying the content and presentation of information on sustainable activities and the methodology, in accordance with Article 8 of the Taxonomy Regulation (EU) 2020/852.

To facilitate the interpretation and application of disclosure under EU Taxonomy Article 8 the Commission published Communications (C/2023/305) and (2022/C385/01) and in December 2021 the FAQ: *What is the EU Taxonomy Article 8 delegated act and how will it work in practice?*

- **Delegated Regulation (EU) 2021/2139** of 4 June 2021 (Climate Delegated Act) sets out the technical selection criteria for determining the conditions under which an economic activity makes a substantial contribution to climate change mitigation or adaptation

To facilitate the interpretation and application of certain legal provisions of the EU Climate Taxonomy Delegated Act, the European Commission issued Communication C/2023/267 on 20 October 2023. On 29/11/2024 the European Commission issued a *DRAFT COMMISSION NOTICE* on the interpretation and application of certain legal provisions of the EU Delegated Act on Environment, the EU Delegated Act on Climate and the EU Delegated Act on Dissemination of Taxonomy Information

Building on the 2023 exercise where the eligibility study of all approved taxonomic activities and the alignment of activities by climate change mitigation and adaptation objectives approved before 2023 was required, the major breakthrough of the taxonomy study in 2024 is the mandatory study of the alignment of all approved taxonomic activities to the 6 environmental objectives.

The Inmocemento Group has analysed the proportion of its economic activities that are eligible, aligned, non-aligned and non-eligible in terms of **Turnover**, **CapEx** and **OpEx** for 2024 for the objectives of Climate Change Mitigation and Adaptation, Sustainable Use and Protection of Water and Marine Resources, Transition to a Circular Economy, Pollution Prevention and Control and Protection and Recovery of Biodiversity and Ecosystems. Of the 6 objectives, the Inmocemento Group has eligible activities for mitigation and adaptation to climate change and circular economy.

The increase in the number of activities and objectives to study their alignment in 2024 has not led to an increase in eligibility, as the activities eligible under the circular economy objective were already included in the climate change mitigation objective.

Scope of the report

On 16 May 2024, in accordance with the provisions of article 226 of Law 6/2023 of 17 March on Securities Markets and Investment Services and other related provisions, Fomento de Construcciones y Contratas, S.A. ("FCC" or the "Company") announces the following inside information to the market:

"Partial financial spin-off of FCC, as a spun-off company, in favour of Inmocemento, S.A.U., by virtue of which FCC will transfer to Inmocemento, S.A.U. two economic units, the first consisting of all the shares of FCYC, S.A. owned by FCC and the second of all the shares of Cementos Portland Valderrivas, S.A. owned by FCC, with the partial financial spin-off being linked to the admission to trading of the shares of Inmocemento, S.A.U. on the Madrid, Barcelona, Bilbao and Valencia Stock Exchanges".

According to the Delegated Disclosure Regulation (EU) 2021/2178 Annex I Key Performance Indicators for non-financial companies point 1.2.1: *"Where the application of any calculation has changed since the previous reporting period, non-financial companies shall explain why those changes result in more reliable and relevant information and provide restated comparative figures"*, whereby the KPIs for the year 2023 have been restated.

The scope of application of the EU Taxonomy Regulation for the Inmocemento Group, created from the partial financial spin-off of the FCC Group in 2024, includes all the services it performs in the real estate management and cement manufacturing sectors, including all the subsidiaries and groups that comprise them.

In the templates for the key performance indicators for non-financial companies (annex 2 of Delegated Regulation (EU) 2021/2178) for each KPI (turnover, CapEx and OpEx) the results of "year N" and the results of "year N-1" are indicated for comparison. Due to the spin-off of Inmocemento, all income and expenses contributed by the Cement and Real Estate activities up to the time of the spin-off have been reclassified for accounting purposes in order to make the data comparable to those presented during 2024, despite the fact that the Inmocemento group was incorporated on 7 November 2024.

Each of the business areas has carried out a detailed analysis of the services performed, in order to classify the activities and evaluate them according to the EU Taxonomy Regulation. This information is consolidated in a single report.

In order to obtain and monitor financial data, the tool used by the Inmocemento Group to consolidate the annual accounts is the SAP Financial Consolidation platform, thus avoiding double counting and guaranteeing the appropriate consideration of eliminations and adjustments.

Eligibility and alignment methodology and analysis

The taxonomy exercise has evolved as the various delegated regulations have come into force.

In 2022, the Cement and Real Estate Areas, belonging to the FCC Group at that date, carried out an analysis of the different activities carried out by each and every one of the businesses that comprise them. All eligible activities included in the climate change mitigation and adaptation objectives and those not eligible were determined. Within the eligible activities, aligned and non-aligned activities were quantified.

In 2023, the Cement and Real Estate Areas, belonging to the FCC Group at that date, extended the eligibility analysis to the activities included in the sustainable use objectives and the protection of water and marine resources, the transition to a circular economy, the prevention and control of pollution and the protection and recovery of biodiversity and ecosystems. Also, to new activities published under the climate change mitigation and adaptation objectives.

For the 2024 financial year, the Inmocermento Group has carried out the eligibility and alignment analysis taking into account all taxonomic activities including the 6 environmental objectives.

When carrying out the EU Taxonomy exercise, it is important to differentiate between the following concepts:

- An **activity is eligible** if it is included in the descriptive of taxonomic activities listed in the Taxonomy Delegated Regulations, considered to have the potential to contribute substantially to one or more of the environmental objectives set out in Article 9 of Regulation (EU) 2020/852 , and which is demonstrated through the alignment analysis of eligible activities.
- Those activities that have previously been determined as eligible are **considered to be aligned** with the taxonomy if the activity meets the criteria for substantial contribution (SCC), does not cause significant harm to other environmental objectives (DNSH) and meets minimum social safeguards.
- An economic activity that has not been identified by the EU Taxonomy would be an **ineligible activity** and therefore no criteria are available for it, either because it has no potential to make a substantial contribution to any taxonomic objective or because it could be included in the future EU Taxonomy regulation.

In order to meet the taxonomy requirements during the year, the Inmocermento Group assessed compliance with these requirements using its own resources, carrying out a detailed analysis based on the taxonomic activities applicable to the Group and their characteristics.

Definition of minimum management unit

Based on the consolidatable units included in the consolidated financial statements of the Inmocermento Group, the eligibility and alignment analysis has been carried out taking into account **the minimum management unit**.

The minimum management unit considered is the **contract** in the real estate activity, for the construction of buildings and the rental of housing, offices or commercial premises. In the cement manufacturing activity, the minimum management unit is the **industrial installation**.

Based on these minimum units, the financial key performance indicators (hereinafter KPIs) set out in the taxonomy have been calculated separately for all the minimum management units, without considering transactions with other management units of the consolidated Group, in order to subsequently assess their eligibility and alignment, if applicable, on a case-by-case basis.

The Inmocermento Group has carried out the appropriate controls to ensure that the sum of the KPIs obtained individually for each of the management units comprising each consolidation unit included in the consolidated financial statements coincide with the KPIs calculated for the corresponding consolidation unit. This ensures that no amount is double counted.

Eligibility study

Once the different minimum management units have been identified, their eligibility has been reviewed for each taxonomic objective and, if eligible, their alignment.

- **The economic activity is eligible only for one taxonomic objective and one taxonomic activity.** In this case it can only be aligned by one objective. This is the case for the activities in the taxonomic groups of manufacturing (MCC 3.7 cement manufacture) and construction (MCC 7.7 acquisition and ownership of buildings).
- **The economic activity is eligible for several taxonomic objectives and activities.** This is the case for the construction group activity CCM 7.1 CE 3.1 Construction of new buildings. The same economic activity could be simultaneously aligned by the climate change mitigation and circular economy objective. **In 2024 there are no activities with double alignment.**

Environmental objectives		Taxonomic activities		Activities carried out by the Inmocermento Group	
MANUFACTURING					
Climate mitigation	change	MCC 3.7 manufacture	Cement	Cement Area: factories for the production of grey clinker and cement from grey clinker in Spain and Tunisia.	
BUILDING CONSTRUCTION AND PROPERTY DEVELOPMENT ACTIVITIES					
Climate mitigation / Transition to a circular economy	change	MCC 7.1 SG 3.1 Construction of new buildings		Real Estate: housing development.	
		MCC 7.7 Acquisition and ownership of buildings		Real Estate: rental of offices, commercial premises and homes.	

The proportion of eligible economic activities according to the taxonomy during 2024 has been as follows:

	1.INCN		2.CAPEX		OPEX	
	FY2024	%	FY2024	%	FY2024	%
IN-CEMENT ELIGIBILITY						
ELIGIBILITY	804.9	85.3%	23.2	40.7%	66.1	89.9%

*The total amounts are expressed in units of millions of euros.

- **Revenue - turnover:** €804.9 million; 85.3% of total eligible turnover.
- **CapEx:** €23.2 million; 40.7% of total eligible.
- **OpEx:** €66.1 million; 89.9% of total eligible.

Enabling and transition activities

A taxonomic activity is **facilitative** when it directly enables other activities to make a substantial contribution to one or more of these objectives.

A taxonomic activity is **transitional** if there is not technologically or economically viable low-carbon alternative, where it supports the transition to a climate-neutral economy consistent with a plan to limit temperature increase to 1.5°C above pre-industrial levels by phasing out greenhouse gas emissions, especially emissions from fossil fuels.

The only **transitional activity** carried out by the Inmocermento Group in 2024 was CCM 3.7 cement manufacturing. This activity is not aligned in the 2024 financial year.

Activities not eligible under EU Taxonomy

In addition to the eligible activities, the Inmocermento Group performs services that are considered ineligible, due to their low impact on the environment or because they are activities not currently included in the delegated regulations.

In the Real Estate Area, the main ineligible activities are building maintenance and land purchase and sale. In the Cement Area the activities of quarries, the manufacture of mortars, concretes and trading.

Alignment study

For Taxonomy-eligible activities, the analysis is completed with a study of their alignment.

An activity is considered to contribute directly to the environmental objectives of climate change mitigation or adaptation, protection of water and marine resources, transition to a circular economy, prevention and control of pollution and protection and restoration of biodiversity and ecosystems, if it complies:

1. Technical criteria for the selection of the activity within its taxonomic objective.
2. No Significant Harm Criteria (DNSH) for the remaining taxonomic targets
3. Minimum social safeguards.

Proportion of economic activities aligned according to taxonomy during 2024:

	1.INCN		2.CAPEX		OPEX	
	FY2024	%	FY2024	%	FY2024	%
IN-CEMENT ALIGNMENT						
ALIGNMENT	125.1	13.3%	6.2	10.8%	10.4	14.2%

*The total amounts are expressed in units of millions of euros.

- **Revenue - turnover:** 125.1 million €; 13.3% of total turnover.
- **CapEx:** €6.2m; 10.8% aligned on total.
- **OpEx:** €10.4m; 14.2% of the total.

Substantial contribution criteria

This is the first step in the analysis of the alignment of the different eligible activities in which the Inmocermento Group is involved.

Alignment study: DNSH

In addition to meeting the substantial contribution criteria for an activity to be considered in line with the EU Taxonomy, it must be ensured that it does not cause significant harm to other environmental objectives (*Do Not Significant Harm*).

DNSH Climate change mitigation

In addition to the eligible activities for adaptation to climate change, in FY2024 this DNSH has been studied for the eligible activity of the transition to a circular economy objective CE 3.1 construction of new buildings.

DNSH Adaptation to climate change. Climate risks

In line with its commitment to the fight against climate change and to comply with the specific requirements of the EU Taxonomy for Adaptation DNSH, the Inmocoemento Group has a complete and updated analysis of the Group's physical climate risks.

This analysis is part of an overall project on the risks and opportunities of the Group's activities associated with climate change. The project includes the identification and assessment of physical and transitional climate risks and climate opportunities, as well as the estimation of the financial impacts arising from the materialisation of these risks and the exploitation of the opportunities.

The Group has a procedure for the definition and establishment of the methodology for the identification, assessment and prioritisation of climate risks and opportunities, as well as for the estimation of their financial impact, in order to subsequently establish the corresponding response measures.

With regard to physical climate risks, which are the subject of this section, it should be noted that the analysis is based on climate projections according to the most advanced scientific information, on a dual time scale, given that the FCC Group's activities are for a duration of between 10 and 40 years.

On the one hand, a horizon up to 2040 is used, with smaller-scale climate projections. On the other, a horizon up to 2060, for which advanced and higher resolution climate projections are used, such as the future scenarios of Shared Socio-economic Trajectories SSP2-4.5, SSP1-2.6 and SSP5-8.5 of the Sixth Assessment Report (AR6) on climate change of the Intergovernmental Panel on Climate Change (IPCC), without ruling out other scenarios of this same report, such as SSP4 6.0. These scenarios correspond to the updated version of the Representative Concentration Pathways (RCPs) of the IPCC Fifth Assessment Report, as referred to in the EU Taxonomy Regulation.

With regard to the specific methodology described in the procedure for the assessment of climate risk, it should be noted that this is based on the result obtained by multiplying the probability of occurrence of the hazard by the degree of exposure and the vulnerability of the company's activities and its assets to said hazard. The calculation makes it possible to determine the importance or materiality of the physical climate risks for the economic activity, directing efforts to establish adaptation measures that reduce the most significant physical climate risks.

The adaptation solutions defined by the Inmocoemento Group take into account the specifications of Delegated Regulation 2021/2139; do not negatively affect adaptation efforts, nor the level of resilience to physical climate risks of other people, nature, cultural heritage, property and other economic activities; are consistent with local, sectoral, regional or national adaptation strategies and plans; and consider the use of nature-based or blue-green infrastructure solutions.

In 2024, with respect to this section, the assessment of climate vulnerabilities and risks affecting the Group's activities and geographies was reviewed and updated.

The climate risk map has been updated to take account of new activities and to ensure that no significant harm is caused to climate change adaptation.

DNSH Sustainable use and protection of water and marine resources

The Inmocemento Group is aware that its business activities can have an impact on the water and marine environment. That is why, in order to minimise its effects and in line with the requirements of the corresponding DNSH of the Taxonomy regulation, the Inmocemento Group integrates comprehensive environmental management systems in its projects and carries out the mitigation and water protection measures derived from the environmental declarations or environmental monitoring plans where appropriate, in line with Appendix B of the Taxonomy Delegated Regulations (EU) 2021/2139 (Annex I and II) and (EU) 2023/2486 (Annexes II, III and IV) on generic criteria relating to the principle of no significant harm to the sustainable use and protection of water and marine resources.

DNSH Transition to a circular economy

In line with the commitments established in the Inmocemento Group, we promote the principles of circularity in the treatment and destination of the waste generated.

The Inmocemento Group has good environmental practices on site that guarantee the reuse and recycling of materials. It also has Environmental Management Policies that ensure the application of best practices in the management, reuse and minimisation of waste.

DNSH Pollution prevention and control

In order to comply with this DNSH, Appendix C of the Taxonomy Delegated Regulations (EU) 2021/2139 (Annex I and II) and (EU) 2023/2486 (Annexes I, II and IV) has been analysed for the taxonomic activities of the Inmocemento Group of cement manufacture, building construction and real estate development.

In CCM activity 7.1 CE 3.1 construction of new buildings, measures to reduce noise, dust and pollutant emissions have been implemented.

The CCM 3.7 cement manufacturing activity complies with the BATs (Best Available Techniques) in terms of pollution prevention and control reflected in the Integrated Environmental Authorisations. In addition, the Inmocemento Group has Environmental Management Policies that ensure the application of best practices in pollution prevention and control.

DNSH Protection and restoration of biodiversity and ecosystems

To ensure the protection of biodiversity, the management systems implemented in the different activities of the Inmocemento Group have been taken into account so as not to cause significant damage, as well as the location of the sites and activities

with respect to natural areas of special protection. In addition, compliance with this requirement is supported by legally carried out Environmental Impact Assessments (EIA) and Environmental Monitoring Plans for works, or Integrated Environmental Authorisations, depending on the activity, in accordance with the criteria established in Appendix D of the Delegated Taxonomy Regulations (EU) 2021/2139 (Annex I and II) and (EU) 2023/2486 (Annexes I, II and III).

The Inmocemento Group has Environmental Management Policies that ensure the application of best practices in the protection and recovery of biodiversity and ecosystems.

Minimum social safeguards

The Inmocemento Group has reviewed the Minimum Guarantees with respect to human rights, corruption, taxation and fair competition, which are set out in the EU Taxonomy Regulation, as well as the final Minimum Guarantees report published by the EU Platform on Sustainable Finance in February 2022.

Based on this review, in the area of Human Rights, the Group has a Human Rights Policy approved by the Board of Directors as part of the regulatory block of the Compliance Model. Through this Policy, aligned with the Global Compact and the United Nations Guiding Principles on Business and Human Rights, the Group declares its commitment to respect the human rights contained in the United Nations Universal Declaration of Human Rights, and those contained in the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, as well as in the eight ILO core conventions.

In order to comply with the commitments of the Human Rights Policy, the Group will define a due diligence procedure in accordance with the UN Guiding Principles for Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. This document will formalise the current process set up in the company in relation to the detection, prevention, and mitigation of adverse human rights impacts, and brings it closer to compliance with the requirements of the Directive of the European Parliament and of the Council on due diligence of companies in the field of sustainability, currently in the process of approval.

The Human Rights due diligence procedure makes Inmocemento's whistleblowing channel available to all stakeholders for reporting potential violations of these fundamental rights. Any communication received through the Group's Whistleblowing Channel is processed in accordance with the Policy and Procedure of the Internal Information System, both approved by the Board of Directors.

The whistleblowing channel, and the Policy and procedures that regulate it, are adapted to the provisions established in Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.

The Inmocemento Group's Compliance Model also includes an express reference in its Code of Ethics and Conduct on both aspects, reflecting the behaviour required by the company, both internally and externally, with regard to potential breaches in matters of Corruption and Competition.

In addition, anti-corruption and competition policies have been approved, which establish the Inmocemento Group's commitments and the prevention and control measures. The Inmocemento Group's Compliance Model provides the most

appropriate training processes for risk groups, the definition of controls in the different management areas of the company, as well as the necessary self-assessments and evaluations to ensure the correct implementation and compliance with the policies.

It is the obligation of all employees of the company to report, through the whistleblowing channel, any potential breach of these policies of which they are aware.

Completion of the Alignment process

Based on the processes described above, the Inmocemento Group has considered as aligned those eligible activities carried out in 2024 that have demonstrated compliance with the applicable CCS, DNSH and with the Minimum Social Safeguards described in the previous section.

Calculation of financial KPIs

EU Taxonomy eligibility and alignment are expressed in three financial KPIs, which are calculated as the portion of **turnover**, **CapEx** and **OpEx** that are considered eligible and, where applicable, aligned or not aligned by Taxonomy (numerator) divided by the total turnover of the Inmocemento Group, **CapEx** and **OpEx** as defined by Taxonomy (denominator). The accounting concepts included to calculate these three KPIs are described below:

- **Revenue - turnover:** Ratio of Turnover - net turnover derived from products or services, including intangibles, associated with economic activities that comply with the taxonomy (numerator), divided by Turnover - net turnover (denominator) as defined in Article 2(5) of Directive 2013/34/EU. The amount of the denominator corresponds to the heading "Net " in the consolidated income statement of the annual accounts of the Inmocemento Group.
- **CapEx:** Proportion of **CapEx**, as defined below, that complies with the taxonomy (numerator), divided by **CapEx** (denominator) as defined in Article 8(2)(b) of Regulation (EU) 2020/852. Includes additions to the gross value of intangible assets, property, plant and equipment and investment property, including additions arising from the application of the regulations in relation to decommissioning and dismantling costs which are included as an addition to property, plant and equipment upon initial recognition of the asset; additions to property, plant and equipment from leases under IFRS 16, as well as additions to the gross value of intangible assets, property, plant and equipment and investment property arising from the takeover as a of a business combination. Changes in depreciation, impairments and revaluations of investment property due to their recognition at fair value are not included. The amounts considered are included under "Intangible assets", "Property, plant and equipment" and "Investment property" in the consolidated balance sheet of the Inmocemento Group's annual accounts.
- **OpEx:** The proportion of **OpEx**, as defined below, that complies with the taxonomy (numerator), divided by the **OpEx** (denominator) as defined in Article 8(2)(b) of Regulation (EU) 2020/852. The amount of this KPI is limited to non-capitalised direct costs that relate to research and

development, building renovation measures, short-term leases, maintenance and repairs, as well as other direct costs related to the day-to-day maintenance of property, plant and equipment assets, by the company or a third party to whom activities are outsourced, and which are necessary to ensure the continuous and efficient operation of these assets. The amounts considered are included under "Changes in inventories of finished goods and work in progress", "Procurements", "Staff costs", "Other operating expenses" and "Depreciation of fixed assets and allocation of non-financial fixed asset subsidies and other" in the consolidated income statement of the Inmocemento Group's annual accounts.

The key indicator revenue-turnover mainly includes revenues from contracts with customers. The typology of customers varies significantly depending on the area of activity as defined in note 1 of the notes to the consolidated financial statements.

- The **real estate** business has two lines of business: property development for sale to private individuals and the rental of offices, commercial premises and homes.
- The **Cement** activity is dedicated to the exploitation of quarries and the subsequent production of cement and derivatives for private customers.

The taxonomic activity of the numerator can be found in the tables in the following sections.

Calculation of business combinations

In 2024, the Inmoco Group has not presented any business combinations for the key business indicators of **revenue - turnover**, **CapEx** and **OpEx**.

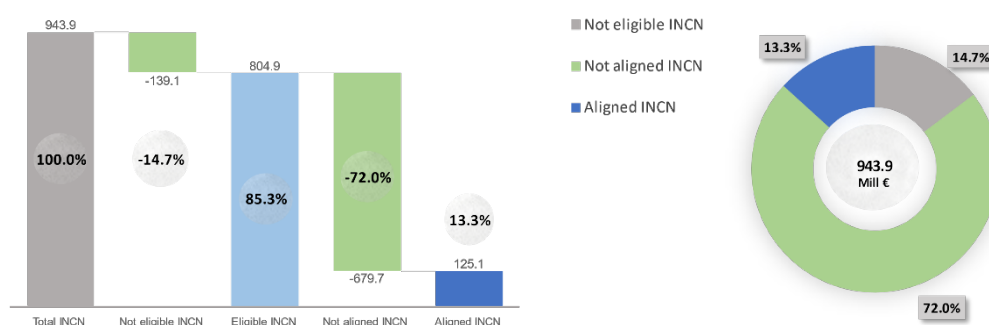
Results for the financial year 2024

For the preparation of the following charts, the KPIs, eligibility and alignment for the year 2023 have been restated to make them comparable to those for the year 2024. In this regard, the KPIs contributed by the Cement and Real Estate activities are presented for the full years 2024 and 2023, regardless of the date on which their partial financial spin-off from the FCC Group was perfected, in a similar way to how they are presented in the annual accounts of the Inmoco Group for 2024.

The following graphs present summaries for each of the KPIs with the results of applying the criteria outlined above.

Summary and evolutionary eligibility and alignment 2023-2024

Revenue - turnover alignment



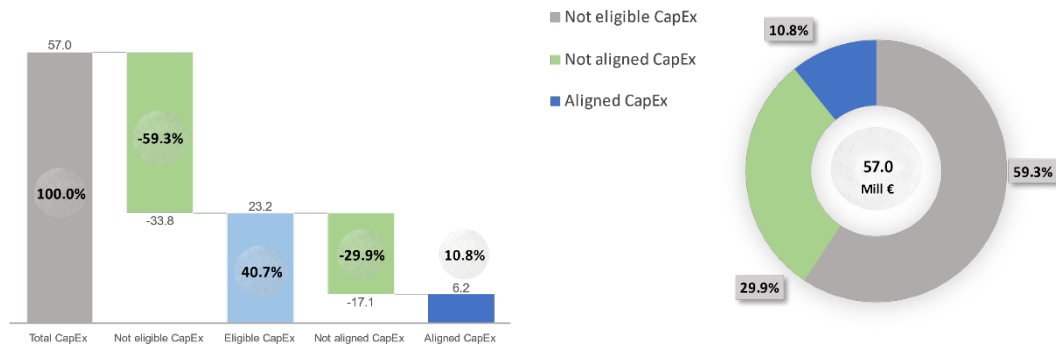
*The total amounts are expressed in units of millions of euros.

For the **turnover** key indicator, the Inmoco Group reports a total amount of 943.9 million euros.

804.9 million euros are eligible; 85.3% of total turnover.

125.1 million are eligible and aligned according to the taxonomy; 13.3% of total turnover.

CapEx alignment



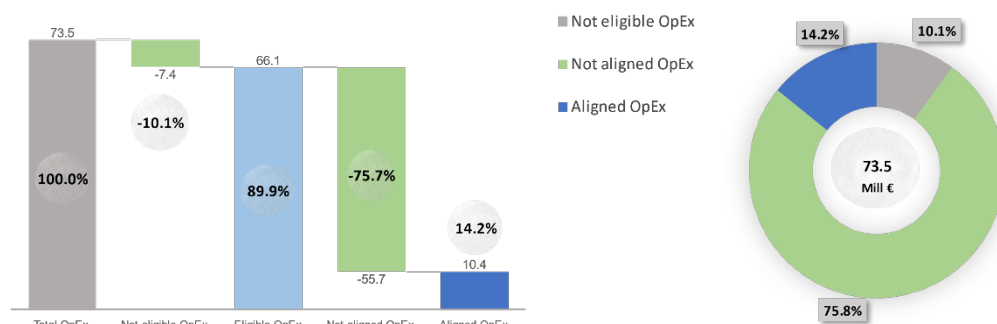
*The total amounts are expressed in units of millions of euros.

For the key **CapEx** indicator, the Inmoco Group reports a total amount of 57 million euros.

23.2 million are eligible; 40.7% of the total CapEx.

6.2 million are eligible and aligned according to taxonomy; 10.8% of total CapEx.

OpEx Alignment



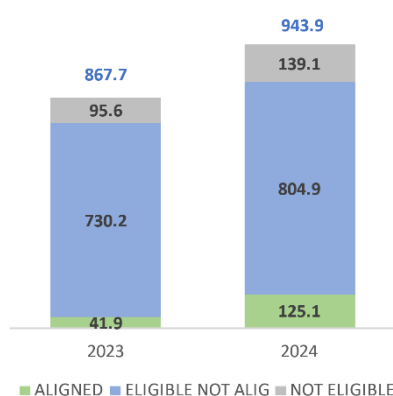
*The total amounts are expressed in units of millions of euros.

For the key **OpEx** indicator, the Inmoco Group reports a total amount of 73.5 million euros.

66.1 million are eligible; 89.9% of total OpEx.

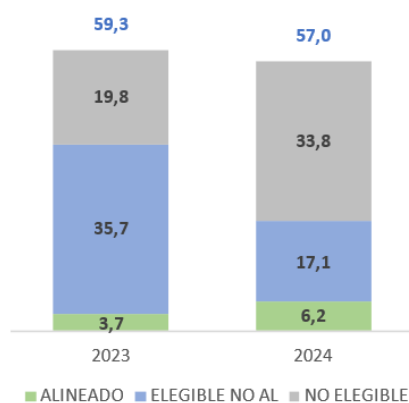
10.4 million are eligible and aligned according to taxonomy; 14.2% of total OpEx.

Evolutionary 2023-2024 Revenue - turnover



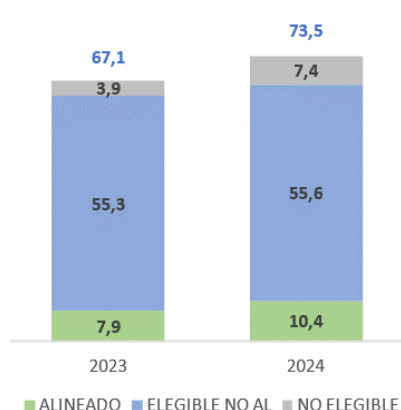
The Inmocemento Group's **turnover has grown by 8.8%** in 2024. The aligned amount **grew by 198.6%** in 2024, thanks to the weight in alignment of the Real Estate Area. The **non-aligned eligible amount has grown by 10.2%** due to the CCM 3.7 Cement manufacturing activity. The **non-eligible amount has grown by 45.5%**.

Evolutionary 2023-2024 CapEx



The Inmocemento Group's **CapEx decreased by 3.8%** in 2024. Regarding the **aligned amount, it has grown by 65.0%** in 2024. The **eligible non-aligned amount decreased by 52.2%**

Evolutionary 2023-2024 OpEx



In 2024, the Inmocemento Group's **OpEx grew by 9.6%**. Regarding the **aligned amount, it has grown by 32.8%** and the **eligible non-aligned amount has grown by 0.7%**.

Templates for key result indicators (EU) 2021/2178 Annex II

Due to the spin-off of Inmocemento from the FCC Group, it has been necessary to restate the taxonomy results of the Inmocemento Group for the year 2023, considering **revenue - turnover**, **CapEx** and **OpEx** according to the criteria described in the Scope section of the report.

Proportion of Taxonomy-aligned turnover template

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities

Financial year FY 2024				Year 2024		Substantial Contribution Criteria						DNSH criteria (Does Not Significantly Harm*)													
Economic Activities		Code	Turnover	Proportion of Turnover, year N	Climate Change Mitigation				Water		Circular Economy		Pollution		Biodiversity		Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity	Minimum Safeguards	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, year N-1	Category enabling activity	Category transitional activity
					Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL									
GRUPO INMOCEMENTO																									
A. TAXONOMY-ELIGIBLE ACTIVITIES																									
A.1. Environmentally sustainable activities (Taxonomy-aligned)																									
Construction of new buildings		CCM 7.1	CE 3.1		59.9	6.34%	Y	N/EL	N/EL	N/EL	N	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	Y		
Acquisition and ownership of buildings		CCM 7.7			65.2	6.91%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	Y	4.83%	
Turnover of environmentally sustainable activities (taxonomy-aligned) (A1)					125.1	13.26%	13.26%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	Y	Y	4.83%	
Of which Enabling					0.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	Y	Y	0.00%	E
Of which Transitional					0.0	0.00%	0.00%								Y	Y	Y	Y	Y	Y	Y	Y	Y	0.00%	T
Proportion of turnover from products or services associated with Taxonomy-aligned economic activities																									
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																									
Manufacture of cement		CCM 3.7			534.5	56.62%	BL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL										60.00%	
Construction of new buildings		CCM 7.1	CE 3.1		90.6	9.60%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	N/EL	N/EL	N/EL									15.63%	
Acquisition and ownership of buildings		CCM 7.7			54.6	5.79%	BL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL									8.52%	
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A2)					679.7	72.01%	72.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	84.16%	
A. Turnover of Taxonomy eligible activities (A1+A2)					804.9	85.27%	85.27%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	88.98%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																									
Turnover of Taxonomy-non-eligible activities					139.1	14.73%																			
TOTAL					943.9	100.00%																			

In taxonomic activities that contribute to more than one objective, the objective to which they contribute is indicated in bold. Due to the spin-off of the FCC Group from Inmocoemento in 2024, the Turnover % in the column 'year N-1' has been recalculated.

Proportion of Taxonomy-aligned CapEx template

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities

Financial year FY 2024		Year 2024		Substantial Contribution Criteria					DNSH criteria ('Does Not Significantly Harm')							Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N-1	Category enabling activity	Category transitional activity			
		Code	CapEx	Proportion of CapEx, year N	Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution				Biodiversity	Minimum safeguards	
Economic Activities					Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	Y: N: N/EL	%	E	T
GRUPO INMOCEMENTO																					
A. TAXONOMY-ELIGIBLE ACTIVITIES																					
A.1. Environmentally sustainable activities (Taxonomy-aligned)																					
Acquisition and ownership of buildings																					
CCM 7.7		CCA 7.7		6.2	10.79%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	6.29%		
				6.2	10.79%	10.79%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	6.29%		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)				0.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	0.00%	E	
Of which Enabling				0.0	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.00%		
Of which Transitional				0.0	0.00%	0.00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities

A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Manufacture of cement																			
Acquisition and ownership of buildings																			
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																			
A. CapEx of Taxonomy-eligible activities (A1+A2)																			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities																			
TOTAL																			

In taxonomic activities that contribute to more than one objective, the objective to which they contribute is indicated in bold. Due to the spin-off of the FCC Group from Inmocemento in 2024, the CapEx % in the column 'year N-1' has been recalculated.

Proportion of Taxonomy-aligned OpEx template

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities

Financial year FY 2024				Year 2024		Substantial Contribution Criteria								DNSH criteria (Does Not Significantly Harm)							Category enabling activity	Category transitional activity																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
		Code	OpEx	Proportion of OpEx, year N	Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity	Minimum Safeguards	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year N-1																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
Economic Activities					Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	Y: N/ N/EL	%																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
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In taxonomic activities that contribute to more than one objective, the objective to which they contribute is indicated in bold. Due to the spin-off of the FCC Group from Inmocoemento in 2024, the OpEx % in the column 'year N-1' has been recalculated.

GRUPO INMOCEMENTO

TURNOVER - ELEGIBILITY AND ALIGNMENT PER ENVIRONMENTAL OBJECTIVE

Environmental Objective		Proportion of turnover/Total turnover	
		Aligned per objective	Eligible per objective
CCM	Climate change mitigation	13.26%	85.27%
CCA	Climate change adaptation	0.00%	0.00%
WTR	Sustainable use and protection of water and marine resources	0.00%	0.00%
CE	Transition to a circular economy	0.00%	15.94%
PPC	Pollution prevention and control	0.00%	0.00%
BIO	Protection and restoration of biodiversity and ecosystems	0.00%	0.00%

CapEX - ELEGIBILITY AND ALIGNMENT PER ENVIRONMENTAL OBJECTIVE

Environmental Objective		Proportion of CapEx/Total CapEx	
		Aligned per objective	Eligible per objective
CCM	Climate change mitigation	10.79%	40.73%
CCA	Climate change adaptation	0.00%	40.73%
WTR	Sustainable use and protection of water and marine resources	0.00%	0.00%
CE	Transition to a circular economy	0.00%	0.00%
PPC	Pollution prevention and control	0.00%	0.00%
BIO	Protection and restoration of biodiversity and ecosystems	0.00%	0.00%

OpEX - ELEGIBILITY AND ALIGNMENT PER ENVIRONMENTAL OBJECTIVE

Environmental Objective		Proportion of OpEx/Total OpEx	
		Aligned per objective	Eligible per objective
CCM	Climate change mitigation	14.20%	89.88%
CCA	Climate change adaptation	0.00%	89.88%
WTR	Sustainable use and protection of water and marine resources	0.00%	0.00%
CE	Transition to a circular economy	0.00%	0.15%
PPC	Pollution prevention and control	0.00%	0.00%
BIO	Protection and restoration of biodiversity and ecosystems	0.00%	0.00%

Activities related to nuclear energy and fossil gas

According to Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022, amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards public disclosure of specific information on those economic activities, financial and non-financial undertakings shall disclose the amount and proportion of non-taxonomy-eligible nuclear-related activities in the denominator of their key performance indicators. Similarly, they shall also report non-taxonomy-eligible fossil gas activities in the denominator of their key performance indicators.

The following is the template with the results of the disclosure of information regarding nuclear and fossil gas activities carried out by the Inmocermento Group.

Nuclear energy activities		
1.	The company conducts, finances or has exposures to research, development, demonstration and deployment of innovative power generation facilities that produce energy from nuclear processes with a minimum of fuel cycle waste.	NO
2.	The company undertakes, finances or has exposures to the construction and safe operation of new nuclear facilities to produce electricity or process heat, including for district heating purposes or industrial processes such as hydrogen production, as well as their safety upgrades, using the best available technologies.	NO
3.	The company carries out, finances or has exposures to the safe operation of existing nuclear facilities that produce electricity or process heat, including for district heating purposes or industrial processes such as the production of hydrogen from nuclear energy, as well as their safety upgrades.	NO
Fossil gas activities		
4.	The company carries out, finances or has exposures to the construction or operation of electricity generation facilities that produce electricity from gaseous fossil fuels.	NO
5.	The company carries out, finances or has exposures to the construction, renovation and operation of combined heat/cold and power generation facilities using gaseous fossil fuels.	NO
6.	The company carries out, finances or has exposures to the construction, renovation and operation of heat generation facilities producing heat/cooling from gaseous fossil fuels.	NO

Social Disclosures

ESRS S1 - Own Workforce

Material impacts, risks and opportunities

Impact materiality

Based on the double materiality analysis, and in relation to its own staff, the impacts of the Innocemento Group (SMB-3_07) that have been material for stakeholders are identified below.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Employment and Professional Development		
(I-S1.1) Creation of direct employment through the recruitment of employees.	AC	OP
(I-S1.2) Encouraging labour market insertion through the promotion of scholarship and professional development programmes.	AC	OP
(I-S1.3) Reconciliation of work and family life.	AC	OP
(I-S1.4) Contribution to the socio-economic development of the communities in which the company operates through the professional development of its employees.	AC	OP
Diversity, Equality and Inclusion		
(I-S1.5) Promotion of gender equality and diversity through the implementation of plans and programmes.	AC	OP
(I-S1.6) Improvement of employees' skills through training programmes.	AC	OP
(I-S1.7) Promoting labour inclusion and job creation among people with disabilities.	AC	OP

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
(I-S1.8) Contribution to the prevention of harassment at work through the application of the Protocol for the Prevention and Eradication of Harassment, as well as training on harassment and cyber-bullying, and the protection of women victims of gender-based violence.	CU	OP
Safety, Health and Welfare		
(I-S1.9) Exposure of employees to health and safety impacts.	CU	OP
<p>* Issue dealt with by specific organisational matters.</p> <div> <div> CU: Current ST: Short term MT: Medium term LT: Long term </div> <div> OP: Own operations UVC: Upstream value chain DVC: Downstream value chain </div> </div>		

For the purposes of the assessment of material impacts, risks and opportunities, all of the company's own employees have been considered (S1.SBM-3_01).

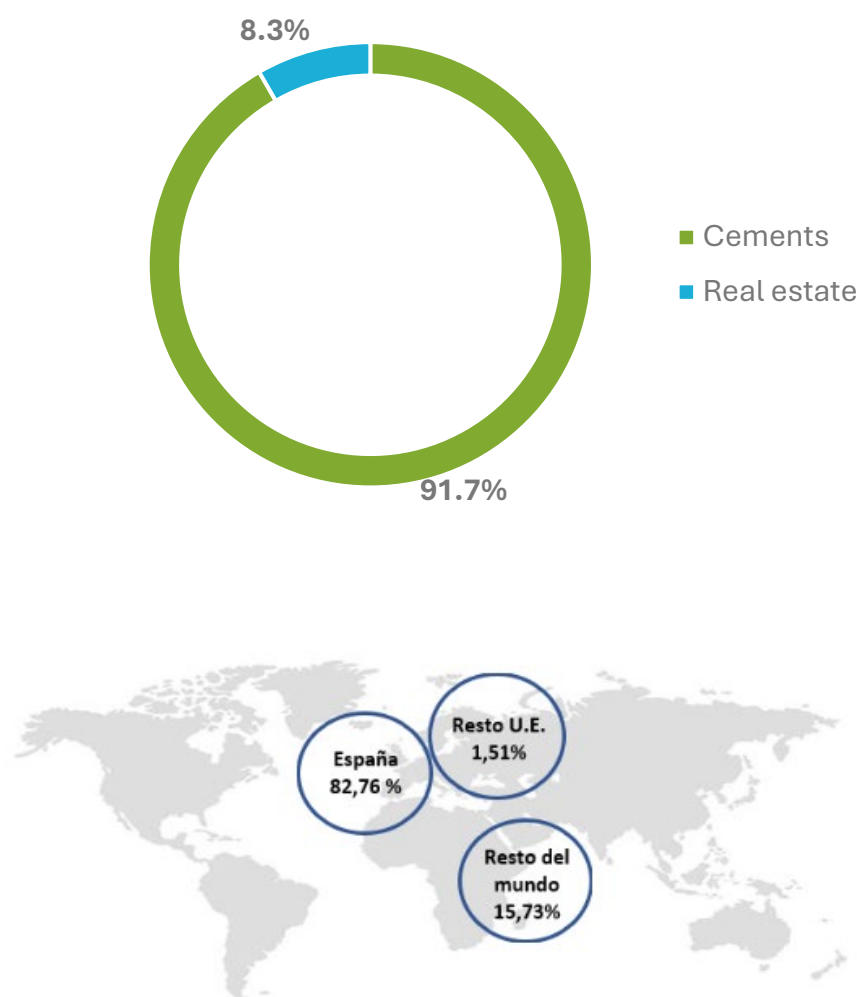
In this sense, the following pillars are built around the Group's activity and in relation to its employees, around which the material impacts, risks and opportunities are configured:

- **Employment**, which would include measures linked to recruitment and work-life balance.
- **Diversity, equality and inclusion**, which includes diversity in all its dimensions (gender, age, etc.), as well as the promotion of the growth of under-represented groups and the generation of opportunities for people at risk of social exclusion. It is also the vector through which we work for the prevention and eradication of harassment, as well as discrimination and gender violence.
- **Development**, or the establishment of a training proposal and learning offer to meet the challenges they face, recognition and promotion, and the provision of career development opportunities for staff.
- **Safety, health and well-being**, in terms of occupational health and safety and integrated health and well-being actions.

In terms of the ESRS, almost all of the Group's own personnel are employees of the Group companies, with which they maintain employment relationships. These employees also dedicate a very high percentage of their activity to functions directly linked to the productive activities of the Group companies, thus placing internal talent at the disposal of customers and other stakeholders in the development of the projects, services and contracts that make up their portfolio and which drive them to work to always offer their best version (S1.SBM-3_02).

The Inmocemento Group's workforce is also global and is made up of people of different nationalities and cultures, which is proof of the diversity that characterises it and also provides it with magnificent skills to face the challenges that are tackled throughout the world with the aim of improving the lives of the people, communities and cities in which we operate, distributed in 4 countries, with the distribution by business areas and geographical areas as shown in the following tables:

STAFF BY BUSINESS AREA



In addition, the Inmoco Group's workforce is characterised by **solid and quality labour relations**. In this sense, most of the employees have permanent and full-time employment relationships when their activity allows it, and employment stability is one of the most significant hallmarks of the Group's identity. As is the maintenance of fair and adequate working conditions (economic and of all kinds) in the different countries and sectors in which it operates. This is linked to an honest, loyal and responsible social dialogue, through which lasting and committed relationships are developed both in favour of the rights and conditions of workers and the stability and sustainable progress of the company.

In addition, **development** and the constant need for adaptation and the drive for personal and professional **growth** lead the Inmoco Group to maintain a wide and growing training offer that covers different specialities, both technical and *compliance*, as well as skills, languages and digital competences, among others, all adapted to the different jobs, personal skills and production needs.

And, as a backbone and essential pillar, the **health and safety** of our employees is of paramount importance. For this reason, we follow the most stringent procedures that determine the operational processes and place the protection and well-being of the workforce at the centre, with a strong dose of training in this area.

The negative material impacts on the workforce are not specific or unique to the Inmocemento Group, but respond to generalised contexts in the market in general or in the sector of activity in which it operates (S1.SBM-3_03).

The Inmocemento Group's plans to transition to greener and carbon-neutral operations could have some material impacts on its workforce. Positive impacts include the creation of direct employment through the hiring of employees and the promotion of job placement through scholarship and professional development programmes, which can generate new job and training opportunities in the transition process.

For its part, the Cement Area is fully aligned with the Sustainable Development Goals (SDGs) of the United Nations, in terms of mitigating the environmental impacts related to the exercise of its activity. To this end, the Company is constantly evolving and innovating to position itself at the forefront of the development of a business model based on sustainability, incorporating measures such as: the use of by-products and fuels to reduce CO₂ emissions and avoid the growth of landfills, the permanent technological update to optimise its energy efficiency and participation in research into the manufacture of low-consumption cements. These types of measures have a positive material impact on employees, given that the Company involves its personnel in these actions, providing them with the necessary training to adapt to innovations and valuing the Company's human capital as an essential pillar for its growth and prosperity (S1.SBM-3_06).

In terms of positive material impacts on the workforce, the Inmocemento Group's activities contribute to professional development, wellbeing and the promotion of diversity and inclusion. Professional growth is promoted through health and wellbeing programmes and actions.

The well-being of the Company's employees is a key pillar, with initiatives including recreational activities, psychological support and health programmes.

Inmocemento also promotes diversity and inclusion through equal opportunities policies and programmes to raise awareness of the importance of a diverse work environment (S1.SBM-3_04).

Financial materiality

Likewise, and based on the double materiality analysis, the material risks and opportunities for the Inmocemento Group (SMB-3_07) are identified below, which must be managed in relation to its own personnel, and which have proved to be material for stakeholders.

Risk/opportunity (SBM-3_02)	Type	Financial effects (SBM-3_08, SBM-3_09)	Location (SBM-3_02)
Equal treatment and equal opportunities			
(F-S1.1) Integration of women.	O	The integration of women is an opportunity for diversity and also helps to facilitate generational change (M).	OP
(F-S1.2) Measures focused on diversity and equality.	O	Competitive differentiation by implementing equality measures, attracting talent and improving the perception of the company. (M)	OP
Other work-related rights			
(F-S1.3) Cyber-attacks and loss of personal data.	R	Disruption of operations and loss of key data due to cyber-attacks	OP
<p>* Issue dealt with by specific organisational issues.</p> <p>R: Risk O: Opportunity</p> <p>M: Possible materialisation in the short term</p> <p>OP: Own operations UVC: Upstream value chain DVC: Downstream value chain</p>			

Material risks and opportunities are identified in general with regard to all own employees without distinction of a specific group in particular (S1.SBM-3_11, S1.SBM-3_12).

No material impacts have been identified in relation to the development of operations in geographical areas with a high risk of forced or compulsory labour or child labour areas (S1.SBM-3_07, S1.SBM-3_08, S1.SBM-3_09, S1.SBM-3_10).

Finally, it is worth highlighting the material opportunities identified by the Inmocemento Group related to equal treatment and opportunities, such as the integration of women and measures focused on diversity and equality through the implementation of actions such as awareness-raising and training campaigns, training programmes aimed at professional training and development, as well as through equality plans (S1.SBM-3_05).

Impact, risk and opportunity management in the Inmocemento Group

The main material impacts detected are analysed below and the actions implemented to mitigate the risks arising from them are described:

Employment

Recruiting and talent attraction

Policies related to employment: Recruiting and talent attraction

The Inmocemento Group pursues the attraction and retention of talent as one of the essential pillars of its business strategy, relying on an expert and professional team of people (MDR-P_01).

This is expressly reflected in Inmocemento's **Code of Ethics and Conduct**, approved by the Board of Directors on 7 November 2024, which states that selection and promotion decisions in the Group must always be based on merit and objective and transparent assessments.

Similarly, the **Inmocemento Group's Equal Opportunities and Safe Environments, Diversity and Inclusion Policy**, approved by the Board of Directors of Inmocemento on 7 November 2024, endorses the above commitment, ensuring that staff selection and recruitment processes must be transparent and objective, free of bias, thus guaranteeing equal opportunities and non-discrimination to ensure the inclusion of people (S1-1_10, S1-1_11, S1-1_12, S1-1_13).

In the same vein, the principles and ompromises of action assumed by Inmocemento in the aforementioned policies are fully in line with the Guiding Principles for Business and Human Rights, contained in both the United Nations Universal Declaration of Human Rights and the ILO Declaration of Fundamental Rights and Principles of Work, together with the conventions that support it (MDR-P_04, S1-1_07).

These policies are also fully aligned with **Inmocemento's Human Rights Policy**, which addresses issues such as opposition to forced or compulsory labour, child labour and human trafficking (S1-1_08).

Likewise, throughout 2024, the Cement and Real Estate business Areas have been applying the FCC Selection Policy approved in 2018 (MDR-P_02, S1-1_01), guaranteeing employees maximum objectivity and the absence of discrimination in the selection process (MDR-P_05).

Actions related to employment: Recruitment and talent attraction

With regard to the actions and/or initiatives developed by the different business lines (MDR-A_02) in 2024 (MDR-A_03) for the **creation of direct employment**, the following should be mentioned, among others:

- Inmocemento seeks to promote and attract **young talent** in its business areas through actions such as the following (MDR-A_01, S1-4_06):
 - The Cement Area has participated through the CEMA Foundation in an interactive initiative aimed at attracting young talent, especially female,

through the production of a video that has been disseminated on the websites of various industry associations - Cement and Environment Labour Foundation (CEMA) and the Association of Cement Manufacturers in Spain (Oficemen) - as well as on digital platforms such as LinkedIn. It has also signed various collaboration agreements with Universities and Vocational Training Centres aimed at university students, postgraduate students and graduates, and currently has 5 Agreements in Spain.

- Another initiative to attract young talent is the regular visits to the different cement factories by university students, so that they can learn first-hand about the production process and the opportunities for professional development in the company.
 - Likewise, the Real Estate Area actively participates in different actions with universities and training centres, such as the UPM School of Construction, in order to promote the attraction of young talent.
- In addition, in 2024, the Cement Area conducted a **Work Climate Survey** aimed at ascertaining the satisfaction and commitment of its employees, as a measure that seeks to promote the attraction, recruitment and loyalty of the Company's talent.
 - In addition, Inmocerinto is committed to the **generational replacement of its workforce**, promoting the use of tools such as the relief contract.

In short, by implementing actions such as those described above, the Inmocerinto Group contributes to building the loyalty of its human talent, as will be explained below (MDR-A_04, S1-4_01, S1-4_02, S1-4_07).

The identification and definition of these actions is carried out by the HR Departments of the Business Areas in harmony and coordination with the different departments involved and especially with those associated with Production, thus analysing the negative impacts and designing response actions that are implemented, depending on their nature, through different mechanisms.

These Departments have sufficient and specialised staff to address the needs that may arise and, in the event that internal capacities are not available or in the event that the action in question so requires, external advice is sought (S1-4_05).

Likewise, the aforementioned HR Departments are assigned an annual budget in accordance with the actions to be addressed, thus enabling the management of the material impacts on the Group's people. At the same time, the management of these impacts is not alien to the rest of the organisation, which participates and is involved depending on the nature of the different actions, so that the attention to these issues concerns the organisation as a whole (S1-4_09).

In addition, the Inmocerinto Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

The monitoring and evaluation of the effectiveness of the actions and initiatives described above depends on the nature of each of them. For example, the analysis

of the results of work climate surveys is an effective tool that contributes to building loyalty and attracting talent to the Company (S1-4_04).

Metrics related to employment: Recruiting and talent attraction

Before setting out the indicators used by Inmocemento to parameterise the effectiveness of the above actions and/or initiatives, it is worth highlighting the following contextual information of interest:

Firstly, it should be clarified that the numerical data on the workforce is calculated using the same criteria as those used in the financial information of the consolidated financial statements of the Inmocemento Group, in accordance with International Financial Reporting Standards (IFRS). Specifically, the total number of employees of fully consolidated companies is calculated by multiplying the number of employees by the percentage of direct participation in joint operations⁵. Thus, the number of employees of joint ventures and associates accounted for using the equity method, as well as the number of employees corresponding to financial holdings in entities in which there is no control, joint control or significant influence (S1-6_13, S1-7_06), are excluded from this calculation.

In the Inmocemento Group, which at December 31, 2024 has 2 distinct business areas, in which 1,189 employees work and which are distributed and provide services in 4 countries around the world.

The distribution of the workforce by gender, business area and country is as follows (S1-6_01, S1-6_02, S1-6_04, S1-6_05, S1-6_07, S1-6_08):

⁵ Joint operations are those consolidated using the method commonly known as proportionate consolidation.

2024⁶

Countries	Man	Woman	Total
Spain	863	121	984
Tunisia	172	15	187
United Kingdom	12	4	16
The Netherlands	2		2
Total	1,049	140	1,189

Employment contracts are therefore formalised according to the specific needs of each of the Business Areas' activities and are based on the type of contract best suited to these needs.

Moreover, one of the main defining characteristics of the Company's workforce is its employment stability, with a notable predominance of permanent contracts over temporary contracts, and it should be noted at this point that there are no employees at Inmocoemto with non-guaranteed hourly contracts.

Specifically, in the current financial year 2024, of the total workforce, 1,067 employees have a permanent contract and 122 have a temporary contract. Likewise, the majority of the staff (91.6%) **work** full-time (1,089 employees), with a limited number of part-time employees (100 employees), as shown in the following table:

	2024 ⁷		
	Gender		
	Man	Woman	Total
Total No. Employees	1,049	140	1,189
No. Employees Indefinite	935	132	1,067
No. of Temporary Employees	114	8	122
No. of Employees with Non-Guaranteed Hours	0	0	0
No. of full-time employees	953	136	1,089
No. Employees Part-time	96	4	100

Similarly, and in terms of averages, in 2024, 1,066 workers had contracts of an indefinite nature, while 120 are of a temporary nature.

In relation to the above, it should be noted that during the year 2024, the number of **new hires** totalled 104.

⁶ Data reported as at 31 December FY2024 by *HeadCount* (S1-6_14, S1-6_15).

⁷ Data reported as at 31 December FY2024 by *HeadCount* (S1-6_14, S1-6_15).

	2024		
	Man	Woman	Total
< 35 years old	32	3	35
35-54 years	50	16	66
> 54 years old	3		3
Total	85	19	104

In this regard, it should be noted that in 2024 the Cement Area has formalised 95 relief contracts, as a result of the commitment to generational relief acquired by the Company.

In relation to the above, it should be noted that the **turnover rate** of Inmocemento in 2024⁸, is as follows (S1-6_12):

	2024	
	No. Resignations	Rate
Men	50	4.21%
Women	18	1.51%
Total	68	5.72%

The above data show a strong **employment stability** in the Inmocemento Group, which is reflected in a low staff turnover rate, which if analysed from the perspective of voluntary resignations would reach **2.27%**.

In conclusion, the distribution of the workforce by age range is as follows (S1-9_03, S1-9_04, S1-9_05):

	2024		
	Gender		Total
	Man	Woman	
Under 30 years old	48	6	54
From 30 to 50 years old	488	73	561
More than 50 years	513	61	574
Total	1,049	140	1,189

These figures confirm the employment stability of our workforce.

⁸ Includes: voluntary resignations, dismissals, retirements and deaths. The percentage has been calculated by dividing the total number of employees who have left the Company for one of the reasons indicated by the number of employees calculated according to the HeadCount method (S1-6_14, S1-6_15, S1-6_16).

The number of employees reported in the Annual Accounts is 1,189 and is reported in section 25. Income and expenses, letter c) Personnel expenses (S1-6_17).

Targets related to employment: Recruitment and talent attraction

No targets have been defined by Inmocemento in this Area (MDR-T_15), insofar as, as can be seen from the analysis of the results of the actions and metrics described above (MDR-T_18), the different measures promoted by the Company as part of its business strategy comply *per se* with the established purpose of attracting and retaining Inmocemento's talent (MDR-T_17), mitigating the material risks and impacts associated with this area of action (MDR-T_16, S1-5_01, S1-5_02, S1-5_03).

For the coming year, the Company is working on the design and implementation of a Recruitment Policy, which establishes the basis of the selection processes for the Inmocemento Group.

Work-life balance

Policies related to employment: Work-life balance

In line with the Business and Human Rights Guiding Principles on equality, as well as the ILO Labour Principles and the conventions on which they are based (MDR-P_04, S1-1_07), Inmocoemento is committed to a quality working environment and well-being based on equal opportunities, non-discrimination and respect for diversity.

To this end, one of the key elements is the reconciliation of the professional and personal lives of its employees, as it has a clear positive impact on their health and emotional wellbeing (among other things, increasing their job satisfaction and commitment, promoting the attraction, recruitment and retention of talent, etc.), while at the same time constituting one of the fundamental elements in achieving effective equality between men and women in the workplace.

That is why Inmocoemento is firmly committed to achieving the right balance between work and personal life, formally setting it out in its policy and/or internal or collective regulations that must be complied with. Specifically:

On the one hand, in the **Equality Plan** signed by the Cement Area, applicable in Spain, where, once again, this commitment is decisively strengthened, promoting the following common measures in terms of work-life balance:

- Development of campaigns and awareness-raising actions on work-life balance and the sharing of responsibilities between women and men.
- Improved leave due to illness and/or death, and to attend to personal and family circumstances.

On the other hand, and in full harmony with the aforementioned principles, it should be noted that both the **Human Rights Policy**⁹ and the **Inmocoemento Group's Policy on the Use of Technological Means**, applicable to the entire workforce (S1-1_01; MDR-P_02), recognise the right to rest and digital disconnection of employees, in accordance with the nature and characteristics of their jobs (MDR-P_05).

In accordance with the above, the Policy for the Use of Technological Resources¹⁰, approved by the Board of Directors of Inmocoemento on 7 November 2024 (S1-1_02). This policy is implemented by the Systems department in coordination with the rest of the organisation (MDR-P_03) and aims to ensure that users of technological resources use them appropriately, responsibly and legally. To this end, the following rules of conduct are regulated, among others, which also allow for a better organisation of working time in order to respect personal and family life, such as:

- Users of the Technological Means shall not be connected to them outside their working hours, except in the event that they have to fulfil an obligation or responsibility that cannot be postponed due to their job.
- Care shall be taken not to send communications or make calls outside working hours.
- Training and awareness-raising actions for staff on the reasonable use of technological tools will be promoted (MDR-P_01).

⁹ As indicated above, this Policy addresses issues such as opposition to forced or compulsory labour, child labour and trafficking in human beings (S1-1_08).

¹⁰ It is accessible on the corporate website at: <https://www.inmocoemento.es/normativa> (MDR-P_01).

Actions related to employment: Work-life balance

The organisation of working time in the different companies of the Inmocermento Group responds to the organisational and productive realities and needs of each centre, function or activity, in accordance with the standards and regulations applicable in each sector and location.

Taking into account the above and the risks and opportunities identified above, in 2024 (MDR-A_03) the Inmocermento Group (MDR-A_02) has implemented the following actions (MDR-A_01, S1-4_01, S1-4_03, S1-4_06) and/or initiatives to guarantee this effective right to work-life balance, co-responsibility and digital disconnection of its employees (S1-4_02, S1-4_07):

- Training course on "Family co-responsibility" for all areas of Inmocermento, aimed at raising awareness of the importance of co-responsibility as a dialogue-based and consensual distribution of family tasks and responsibilities to promote a more egalitarian society and improve the well-being and mental health of all members of the family unit. Although this course is voluntary, 442 people enrolled in it, 262 of whom have completed it to date. After the course, most of the participants agree that it has contributed to raising their awareness of the importance of exercising joint and equal responsibility for family responsibilities (MDR-A_04).
- Inmocermento also promotes the care, well-being and quality of life of its employees through the social benefits resulting from social dialogue (MDR-A_04), most of which are provided for in the conventional regulations applicable in Spain and in the Cement Area Equality Plan, including the following:
 - o Flexible working hours and holiday periods, as well as continuous working hours during the summer and on Fridays.
 - o Improved leave due to illness and/or death, and to attend to personal and family circumstances.
 - o Allowances for disability, hospitalisation, etc.
 - o Group insurance for accidents at work, and compensation for death or permanent, total or absolute disability.

Metrics related to employment: Work-Life balance

Below is a breakdown of, among others, the following indicator in terms of work-life balance that allows Inmocermento to evaluate the effectiveness of the actions and measures described above. Thus:

With regard to leave to attend to personal and family circumstances, it should be noted that in the countries where Inmocermento operates, 100% of employees are entitled to take leave for family reasons in accordance with the applicable local regulations (S1-15_01). 3.19% of Inmocermento's workforce took one or more of these leaves in 2024 to meet their personal needs (S1-15_02).

The total amount of leave used in 2024 by eligible staff is 4.03%.

Targets related to employment: Work-life balance

No general targets have been defined in this area by Inmocemento (MDR-T_15), insofar as, as can be seen from the analysis of the results of the actions and metrics described above (MDR-T_18), the different measures promoted by the Company within the framework of its business strategy are *per se* in line with the purpose of ensuring an adequate balance between the personal and working lives of the Company's employees that contributes to effective equality of opportunities, as well as to the creation of a quality working environment and well-being (MDR-T_17), mitigating the material risks and impacts associated with this area of action (MDR-T_16).

In addition, the Equality Plan applicable to the Cement Area, negotiated at national level between business and social representatives, establishes, among others, specific common objectives (S1-5_01, S1-5_02, S1-5_03) aimed at preventing and mitigating risks and negative impacts in terms of reconciling work and family life (MDR-T_15, MDR-T_16), focusing on raising awareness and promoting the exercise of these rights by employees:

- Promote a culture that facilitates work-life balance and co-responsibility, ensuring that the exercise of these rights also has a positive impact on the professional sphere.
- Improve work-life balance measures to facilitate the reconciliation of personal, family and working life of the workforce, facilitating co-responsibility.

In order to guarantee the achievement of the targets described above and to evaluate the impact of the different action measures agreed upon in the Equality Plan, the annual monitoring of the use of the different work-life balance measures implemented is defined, among others, as an action indicator (MDR-T_17, MDR-T_18).

The monitoring, evaluation and control of the aforementioned data is the responsibility of the corresponding Plan Monitoring Committee at the agreed intervals.

In short, for Inmocemento, the emotional wellbeing and the right to conciliation of its employees is key. Therefore, since 2009 it has been establishing specific measures through tools such as equality plans to ensure their achievement, which has been reinforced with new lines of action such as the aforementioned Human Rights and Use of Technological Means Policies (MDR-T_19).

Development

Training and skills development for employees

Policies related to employment: Training and skills development for workers

For Inmocemento, the training and professional development of all its employees is essential, both in talent management and to respond to the needs and challenges that arise in each of the different businesses.

And this conviction, in line with the guiding principles of human rights set out in the **Inmocemento Group's Code of Ethics and Conduct¹¹**, approved by the Board of Directors on 7 November 2024, and whose implementation is the responsibility of the Audit and Control Committee with the support of the Compliance Committee, which promotes as an essential principle the creation of a fair and diverse working environment that favours the professional and personal development of employees, and which is applicable in all countries where the Company operates, as well as to all employees, management, suppliers and contractors who work with Inmocemento.

Inmocemento's training catalogue combines face-to-face and on-line (e-learning) programmes, as well as mixed and virtual classroom programmes, seeking maximum efficiency and ensuring that training is generally carried out during the working day. The main objective of these programmes is both to meet the training needs linked to the business (*Upskilling*) and to develop new skills in employees that will be in demand in future positions (*Reskilling*), thus achieving an increase in versatility, satisfaction and employability, which will undoubtedly benefit them in the face of new professional opportunities that may arise in the Company, whether in positions of equal or greater responsibility, through professional promotion or even within the same job.

Actions related to employment: Training and skills development for workers

Within the framework of training actions and initiatives that Inmocemento offers its employees, the following developed in 2024 (MDR-A_01, S1-4_01, S1-4_06) are worth mentioning:

- Data&Analytics training as the Data Culture Approach course completed by 203 participants in 2024. This course aims to transform the organisation towards data-driven decision making. Participants have concluded that this programme has enabled them to acquire a greater awareness of the importance of data quality and analysis for decision making.
- Training in Digital Habits, highlighting the Microsoft 365 programme aimed at learning about the evolution of digital tools to contribute to the improvement of processes and adaptation to a changing environment. To this end, training in Copilot, Synchronisation and Management of Collaborative Spaces was carried out in 2024 to optimise the use of collaborative tools and improve efficiency, in which 87 people participated in 2024, who concluded that it

¹¹ It is accessible to anyone as it is hosted on Inmocemento's corporate website at the following link: <https://www.inmocemento.com>

enabled them to optimise the use of corporate tools and improve their efficiency.

- Cybersecurity Programme, launched in July 2024, at national and international level, with the aim of creating and strengthening a culture of information security, protecting our data and systems. To date, 901 people have participated in its three modules ("Email and social engineering", "Cloud and internet security" and "Physical security and remote work"), providing positive feedback in terms of acquiring knowledge to identify and combat possible cyber-attacks and act with a higher level of security.
- Course on anti-corruption, with the aim of teaching employees to identify corruption and its risks and to know the expected behaviours according to compliance regulations. 274 participants completed this course in 2024, indicating that it enabled them to learn more about unacceptable conduct within the Company, the ways to avoid it and to reinforce their knowledge of the whistleblowing mechanisms available to them.
- Development of specific training actions in the area of Sustainability and Innovation by the Cement Area in order to obtain a qualified workforce adapted to the main challenges of the sectors in which the Company operates.
- Participation of the Cement Area in the II Edition of the Culture Awards, in which people are recognised for their best work during the year 2024. This year, awards were given to people who have stood out in two behaviours: "I am an example" and "I am committed", with 14 employees receiving awards.

Most of the actions and initiatives described are aimed at the entire Inmocemento workforce, although some of them are aimed at more specific groups or territorial areas.

These initiatives reflect Inmocemento's commitment to continuous training and adaptation to the current and future needs of the organisation (S1-4_03, S1-4_07).

The identification and definition of these actions is carried out by the HR Departments of the Business Areas in harmony and coordination with the different departments involved and especially with those associated with Production, thus analysing the negative impacts and designing response actions that are implemented, depending on their nature, through different mechanisms.

These Departments have sufficient and specialised staff to address the needs that may arise and, in the event that internal capacities are not available or in the event that the action in question so requires, external advice is sought (S1-4_05).

Likewise, the aforementioned HR Departments are assigned an annual budget in accordance with the actions to be addressed, thus enabling the management of the material impacts on the Group's people. At the same time, the management of these impacts is not alien to the rest of the organisation, which participates and is involved in depending on the nature of the different actions, so that the attention to these issues concerns the organisation as a whole (S1-4_09).

In addition, the Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

The monitoring and evaluation of the effectiveness of the actions and initiatives described depends on the nature of each one of them. For example, the analysis of the feedback of the different programmes implemented is an effective tool that contributes to the retention and loyalty of talent in Inmocemento (S1-4_04).

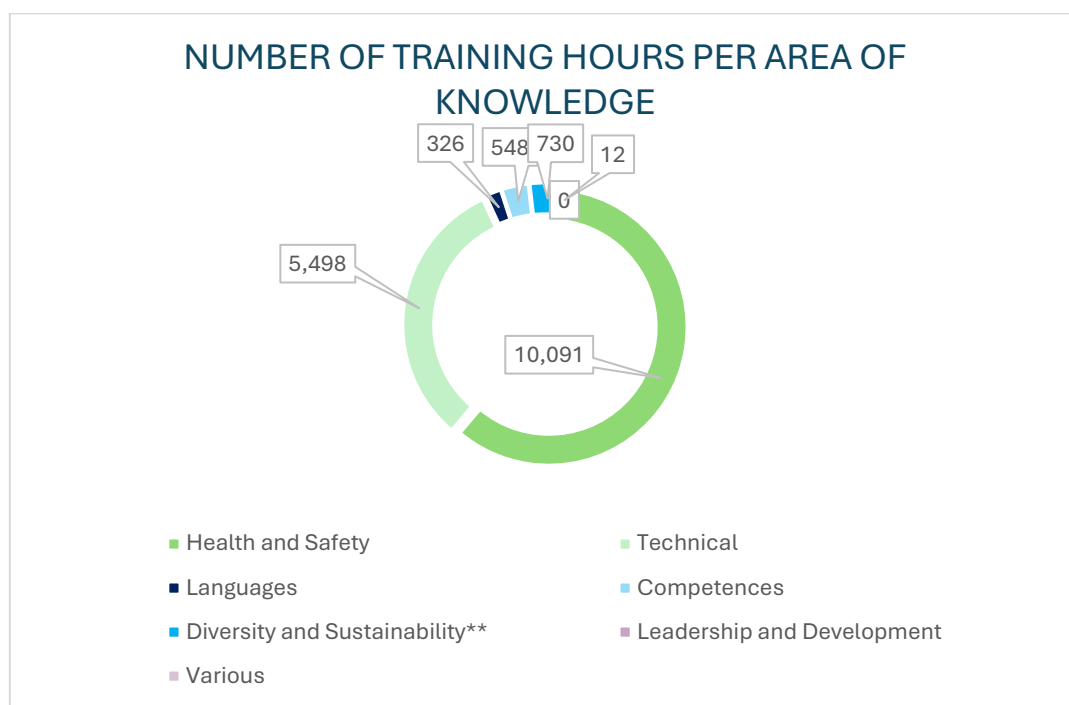
Metrics related to employment: Training and skills development of

Below is a breakdown of the average **hours of training** by gender and level of Inmocemento employees in 2024 (S1-13_03, S1-13_04, MDR-A_05).

	Men	Women	Total
Direction and Management	5.01	25.58	7.21
Controls	23.64	26.11	24.10
Technicians	13.15	16.89	13.63
Administrative	13.51	12.41	13.09
Various trades	13.81	14.61	13.83

Particularly noteworthy is the Company's commitment to the education and training of its employees.

Likewise, with regard to the training provided by **areas of knowledge** in 2024, the following results should be highlighted:



(*) Technical: aimed at developing the technical and digital knowledge and skills of the professional profiles that encompass, among others, the following areas of knowledge: administration and finance, marketing and communication, commercial development, purchasing, HR and digital.

(**) Diversity and Sustainability: actions aimed at strategic objectives of diversity and good corporate governance, and which encompasses the following areas of knowledge: equality and diversity, legal and compliance and social responsibility.

Targets related to employment: Training and skills development for workers

No annual targets have been set in this area, given that, year after year, it has always been present in the Company, and as reflected in the results obtained in the above metrics (MDR-T_18), the implementation of the various measures and training actions carried out by the Company (MDR-T_17), contribute to Innocemento having an increasingly trained and versatile workforce, with different professional knowledge and skills, reducing and/or mitigating the material risks and impacts linked to this matter (MDR-T_15, MDR-T_16, S1-5_01, S1-5_02, S1-5_03).

Professional Promotion and Internal Mobility

Policies related to employment: Professional Promotion and Internal Mobility

Although the Group also uses external recruitment tools, such as employment platforms as specialised agents when circumstances require it, one of the key sources of professional promotion in Inmocemento has been Internal Mobility with the aim of providing its professionals with new opportunities for growth, development and professional promotion, as well as to take advantage of knowledge and strengthen synergies between the different business areas, thus avoiding the loss of human talent.

The basic principles of the aforementioned FCC Recruitment Policy, which has been applied by the Cement and Real Estate Areas, include: (i) prioritising internal promotion by publishing vacancies on the corporate intranet and guaranteeing the transparency of the process; (ii) applying the criteria of maximum rigour and objectivity in the management of people; and (iii) applying the maximum possible flexibility in filling vacancies.

Likewise, the Cement Area's **Equality Plan** strengthens the Company's commitment to the promotion and professional growth of its professionals on an equal opportunities basis, by promoting, among others, the following measures:

- Creation of programmes to identify internal talent with potential for promotion to positions of responsibility, with an emphasis on the under-represented gender.
- Promote staff awareness of all posts to be filled among all work centres (paper, intranet, mail, notice boards, etc.), facilitating the possibility of promotion and participation of the under-represented gender in the post.
- Ensure transparency and communication in internal and external promotion processes from the outset.

Actions related to employment: Professional Promotion and Internal Mobility

In terms of professional promotion, Inmocemento (MDR-A_02) has been advertising its vacancies (MDR-A_03) so that its employees can start, if they wish, an internal mobility process at national level (MDR-A_01), facilitating growth, versatility and professional promotion (MDR-A_05).

The effectiveness of actions is measured differently depending on their nature. For example, in the equality plan monitoring committees, a specific report is made on the evolution of the promotion and internal mobility actions implemented (S1-4_04).

The identification and definition of promotion and internal mobility actions is carried out by the HR Departments of the Business Areas in harmony and coordination with the different departments involved and especially with those associated with Production. These Departments have sufficient and specialised personnel to address the needs that may arise and, in the event that does not have internal capacities or in the event that the action in question so requires, external advice is sought (S1-4_05).

In addition, the Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the

company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

Metrics related to employment: Professional Development and Internal Mobility

The firm conviction of the Inmocemento Group to promote its established internal talent, in its ambition to have flexible, versatile and polyvalent professionals (S1-4_03) is evidenced by the fact that in 2024 a total of 14 employees have been promoted at national level (S1-4_01, S1-4_02, MDR-A_04, MDR-A_05).

Targets related to employment: Professional Development and Internal Mobility

No general targets have been defined in this area by Inmocemento (MDR-T_15), insofar as the different measures promoted by the Company within the framework of its business strategy comply *per se* with the established purpose of prioritising Inmocemento's internal talent to cover vacancies that may arise in the Company (MDR-T_17), mitigating the risks and material impacts associated with this area of action (MDR-T_16).

In addition, the **Equality Plan** applicable to the Cement Area includes the following specific targets (S1-5_01, S1-5_02, S1-5_03) aimed at preventing and mitigating the risks and negative impacts associated with promotion and internal mobility (MDR-T_17). Specifically:

- Ensure that promotion processes are carried out under the principle of equal treatment and opportunities, without discrimination.
- To favour the promotion of people to the different professional groups, functions and jobs in which they are under-represented, and the incorporation of women workers into positions of responsibility.

Diversity, equality and inclusion

Diversity and Inclusion

Policies related to employment: Diversity and Inclusion

For Inmocemento, the promotion of diversity and equal opportunities are hallmarks of the Company's identity, as well as being one of the central pillars of growth and social progress that underpin its corporate philosophy, as a result of its deep-rooted vocation to be an increasingly diverse and socially responsible company and its commitment to achieving the Sustainable Development Goals (SDGs) contained in the United Nations 2030 Agenda.

For Inmocemento, the management of diversity, equality, inclusion in the workplace and the promotion of a real culture of respect, tolerance and fairness is a business, ethical and social imperative that cannot be waived, as set out in the **Human Rights Policy** and **Code of Ethics and Conduct**¹², which advocate the creation of a fair and diverse working environment, prohibiting any form of discrimination, and in the **Equal Opportunities and Safe Environments Policy, Diversity and Inclusion** approved by the Board of Directors on 7 November 2024 and implemented by each business area where a body, person or department will be designated to act as the most responsible (MDR-P_03) and which ratifies Inmocemento's commitment to Human Rights, diversity in the work teams and the values of loyalty, professionalism, well-being and development of its communities recognised in the Code of Ethics and Conduct of the Inmocemento Group (MDR-P_05).

It should also be noted that the aforementioned **Equality Policy**, which applies to all Inmocemento Group employees¹³ (MDR-P_02, S1-1_01), is aligned with the Code of Ethics and Conduct, the Human Rights Policy, the Sustainability Policy, the principles of the United Nations Global Compact and the 2030 Agenda for Sustainable Development (MDR-P_04, S1-1_07), the principles of the United Nations Global Compact and the 2030 Agenda for Sustainable Development (MDR-P_04, S1-1_07), the integration of equality, diversity and inclusion at all levels and activities of Inmocemento is an essential objective, in addition to the following targets (MDR-P_01):

- To facilitate a diverse, equitable and inclusive work environment, where individual differences are respected and valued, fostering creativity and innovation, enriching Inmocemento with different knowledge, skills, experiences and perspectives.
- Ensure a respectful working environment, free from discrimination, harassment or any form of intolerance or violence against any person on the basis of nationality, racial or ethnic origin, age, disability, religion, conviction or opinion, sexual orientation or identity, gender expression, sexual characteristics, marital status, or any other personal, physical or social condition.
- Involve all Inmocemento employees in the fulfilment of this Equality Policy, regardless of their position or function.

¹² As indicated above, the Human Rights Policy addresses issues such as opposition to forced or compulsory labour, child labour and human trafficking (S1-1_08).

¹³ It is hosted on the corporate website at the following link: <https://www.inmocemento.es/normativa> (MDR-P_06).

- Encourage measures, processes and actions to be developed from the perspective of equality, diversity and inclusion, avoiding situations of direct or indirect discrimination.

Actions related to employment: Diversity and Inclusion

For Inmocemento (MDR-A_02), the integration of equality, non-discrimination, diversity and inclusion in social relations, as well as in all the activities and sectors in which it operates, is a permanent element in its social agenda and this is reflected in the multiple and constant actions (MDR-A_03) and/or projects developed by the company in these areas (MDR-A_01, S1-4_01, S1-4_06).

In this sense, Inmocemento has policies and/or internal regulations that are fundamental to promote this corporate culture of respect and inclusion free of any form of discrimination, such as, among others, the aforementioned **Human Rights Policy, the Code of Ethics and Conduct, the Equality and Diversity Policy, as well as the Protocol for the prevention and eradication of harassment** (MDR-A_04, S1-4_03, S1-4_07).

Inmocemento also forms part of specialised initiatives and organisations, including the following:

- The Cement Area has been actively collaborating since 2009 with the Adecco Foundation (Plan Familia), which aims to help people with disabilities find employment.
- The Real Estate Area has also recently collaborated in the organisation of a charity Christmas market in collaboration with the Prodis Foundation, which works to pave the way for the future employment of people with intellectual disabilities.
- In addition, the Real Estate Area participated this year in the 7th Inclusive Football Charity Tournament organised by the ASPRIMA and Down Madrid Foundations, a sporting event held to support people with intellectual disabilities. It also participated in the development of a campaign to raise awareness of sport for people with disabilities together with the Enrique Esteire Perla In Memoriam Association.

As a corollary to the above, it is worth mentioning that, specifically, in 2024, intense work has been carried out to raise awareness and sensitise the staff on the subject, thanks to which the achievement of a fair, serious and profoundly diverse working atmosphere in Inmocemento from all points of view (age, sexual orientation, etc.) has been boosted:

- In 2024, Inmocemento has sealed its commitment to Diversity and Equality through the signing of the Diversity Charter by the Cement Area, thus committing to raise awareness, disseminate and integrate the 10 principles of the Diversity Charter in its daily management, among all the people who make up its workforce.

In this way, Inmocemento continues to make progress in the implementation of good practices that reinforce its competitiveness and social commitment.

- This year 2024, the Cement Area has joined the celebration of the "International Zero Discrimination Day" in order to promote diversity and the creation of inclusive and equitable working environments.
- Likewise, the launch of the training course "LGTBIQ+ Movement: For an inclusive environment", with the aim of providing the keys and good practices to learn about and contribute to the LGTBIQ+ movement, creating safe and inclusive spaces.

Inmocemento has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

The aforementioned departments, through the annual budget allocated in accordance with the actions to be addressed, enable the management of the key material impacts, which are not alien to the rest of the organisation, which participates and is involved depending on the nature of the different actions, so that attention to these issues concerns the organisation as a whole (S1-4-09).

Metrics related to employment: Diversity and Inclusion

Inmocemento works for the inclusion of people with disabilities and people at risk of exclusion, betting on talent without limits and promoting their recruitment. In this sense, 0.76%¹⁴ of Inmocemento's total workforce in 2024 has a recognised disability. In Spain, where the bulk of the Group's workforce is concentrated, this percentage represents 0.9%. In addition, the Cement Area has signed a contract with a Special Employment Centre in Spain for the supply of materials and equipment.

In this sense, the distribution of people with disabilities by gender is as follows (S1-12_01):

	2024		
	Men	Women	Total
No. Persons with disabilities	9	0	9
% S/Collective	100.00%	0.00%	100%
% S/Staff	0.76%	0.00%	0.76%

The Inmocemento Group works for the inclusion of people with disabilities and people at risk of exclusion, betting on talent without limits and promoting their recruitment. In this regard, 0.76% of the Group's total workforce in 2024 has a recognised disability. In Spain, where concentrates the bulk of the Group's workforce, this

¹⁴ The calculation of the numerical data of people with disabilities was obtained by dividing the number of people with recognised disability certificates in the different countries in which FCC operates (S1-12_03) by the total number of workers calculated according to the *HeadCount* method.

percentage represents 0.9%. In addition, the Cement Area has signed a contract with a Special Employment Centre in Spain for the supply of materials and equipment.

Targets related to employment: Diversity and Inclusion

As mentioned above, the evolution towards a more diverse and inclusive society is a permanent element in Inmocermento's social agenda and, therefore, it is not necessary to set additional targets in this regard (MDR-T_15), as the Company is continuously implementing various actions and initiatives in this area, as evidenced by those described in the previous sections aimed at achieving this key strategic objective of Inmocermento's corporate philosophy and business model (MDR-T_16, S1-5_01, S1-5_02, S1-5_03).

Likewise, and as can be seen from the results obtained after the implementation of these actions and/or initiatives, a double objective is achieved: a) mitigate the material impacts identified in this matter and, b) achieve the purpose pursued by Inmocermento, which is to advance in the construction of a real corporate culture of respect, tolerance and equity, such as having an increasingly diverse workforce, with different points of view, approaches and ideas that will undoubtedly contribute value to the different businesses of the Company (MDR-T_17, MDR-T_18).

Equal opportunities

Policies related to employment: Equal Opportunities

For Inmocoemto, the promotion of effective equality between women and men is essential, as stated in **the Group's Equal Opportunities and Safe Environments, Diversity and Inclusion Policy**.

In addition, the Cement Area in Spain has a Group **Equality Plan**, the result of ongoing social dialogue and a common interest in reinforcing and guaranteeing equal treatment and opportunities between women and men in the Company. This Plan includes, among others, the following lines of action:

- Implement the principle of equal treatment between women and men, ensuring equal opportunities for entry and career development at all levels of employment.
- To carry out training actions that facilitate the development of skills and competences equally, regardless of gender.
- Prevent, avoid and act in situations of sexual and/or gender-based harassment.
- Disseminate a corporate culture committed to equality, involving the entire organisation.
- Use inclusive communication in all areas of the company.

Actions related to employment: Equal opportunities

Therefore, in order to effectively achieve both the lines of action defined in these plans and Inmocoemto's conviction to make equality a reality in the workplace, the following initiatives and programmes promoted in 2024 aimed at creating an enriching work environment, free of discrimination of any kind, favouring diversity and female talent (MDR-A_01, S1-4_01, S1-4_02, S1-4_06) should be highlighted:

- Inmocoemto has once again joined in the commemoration of International Women's Day, giving a vision and perspective to women in the company's sectors.
- Among other initiatives, the Real Estate Area illuminated the emblematic "Torre Realia" with the colour purple as a symbol and representation of women on International Women's Day.
- For its part, the Cement Area launched the "I_COMMIT" initiative in 2024 in order to give visibility to and reiterate the Company's firm commitment to equality. The initiative was launched in all its work centres to celebrate International Women's Day, as a space to share reflections, evaluate progress and pay tribute to female employees.
- Likewise, the Cement Area constantly carries out awareness campaigns on equality issues such as publications aimed at giving visibility to women who develop their professional careers in the Company, as well as on the importance of equality, inclusion and diversity as the backbone of action.

The actions and/or initiatives described above are mostly aimed at the entire Inmocemento workforce, combined with specific actions and/or initiatives for certain groups, especially women.

The effectiveness of these actions varies according to their nature. For example, the development of training actions raises staff awareness of the principle of equal opportunities, as well as the importance of the progress of women within the Company (S1-4_04).

The identification and definition of these actions is carried out by the HR Departments of the different business areas, in harmony and coordination with the different departments involved and especially with those associated with Production, thus analysing the negative impacts and designing response actions that are implemented, depending on their nature, through different mechanisms. These Departments have sufficient and specialised personnel to address the needs that may arise and, in the event that internal capacities are not available or in the event that the action in question so requires, external advice is sought (S1-4_05).

Similarly, Inmocemento's HR departments are allocated an annual budget in line with the actions to be undertaken, thus enabling the management of the material impacts on the Group's people. At the same time, the management of these impacts is not alien to the rest of the organisation, which participates and is involved depending on the nature of the different actions, so that addressing these issues concerns the organisation as a whole (S1-4_09).

In addition, the Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

Metrics related to employment: Equal Opportunities

Through the implementation of the above actions and/or projects in this area, year after year, Inmocemento works tirelessly to ensure the full incorporation of women in all positions and at all levels and to achieve full pay equity.

This is reflected in the fact that, at the end of 2024, the percentage of women in management positions had reached 18.70% of the total number of such positions.

Inmocemento's remuneration management is based on the criteria of objectivity, external competitiveness and internal equity, and the Company does not differentiate by gender, so that remuneration is equitable according to the level of contribution to the business (functional level) and the level of responsibility and value in each job.

With regard to the calculation of the **salary gap** in the Inmocemento Group, two types are considered, gross and adjusted¹⁵, highlighting that for the first time in 2024, this data will be reflected per hour, according to the following calculation methodology (S1-16_01):

¹⁵ The method of calculating the gross and adjusted pay gap is different from previous years in accordance with the new ESRS requirements, so the data are not comparable with previous years (S1-16_03).

Gross hourly wage gap**-5.07%**

It is calculated as the percentage difference between the average total hourly wages of men and women.

Hourly adjusted wage gap**4.36%**

It is calculated by considering those aspects that compare men and women in a similar situation, such as seniority, functional level, applicable collective agreement, etc.

In any case, it should be noted that the percentage difference does not imply the existence of gender-based pay discrimination, as there are factors outside the Company's sphere of action that contribute significantly to increasing the gender pay gap. Among them, we can highlight the masculinisation of most of the sectors in which the Group operates, individual performance, economic crisis, political situation, socio-cultural reasons, academic training, or experience in the position held.

Targets related to employment: Equal opportunities

The effectiveness of the actions and/or projects detailed above, which Inmoco has been actively promoting in its efforts to create a working atmosphere in which effective equality between men and women prevails, makes it unnecessary to set specific targets in this area. (MDR-T_15).

Notwithstanding this, the Cement Area **Equality Plan** regulates a series of targets (S1-5_01, S1-5_02, S1-5_03) such as those mentioned above, as well as different positive action measures (MDR-T_16).

In this respect, the following targets, among others, stand out in the aforementioned Equality Plan aimed at combating the under-representation of women:

- Guarantee equal treatment and opportunities for women and men in recruitment, training, promotion and advancement, based on objective, quantifiable, public and transparent criteria.
- Encourage the incorporation and professional promotion in the Company until a balanced presence of men and women in coordination and management positions is achieved, provided that this can be carried out on the basis of objective, quantifiable, public and transparent criteria.
- To achieve a greater presence of women in those jobs where they are absent or under-represented.

With regard to the indicators established (MDR-T_18) to analyse the annual monitoring by the Monitoring Committee, the following, among others, should be mentioned (MDR-T_17):

- Annual information on the number of vacancies published.
- Actions taken to increase the presence of women in positions where they are under-represented and number of applications submitted.

- Number of participants, disaggregated by gender, in training programmes to incorporate women in positions where they are under-represented.
- Annual comparison of the distribution of the workforce by functional levels/professional groups disaggregated by gender at those levels where women are under-represented.

In short, the promotion of a culture of equal treatment and opportunities between women and men is a strategic element for the development of Inmocemento, and for this reason, since 2009 it has been establishing specific measures through equality plans to ensure its achievement (MDR-T_19).

Non-discrimination and Prevention and eradication of harassment

Policies related to employment: Non-discrimination and Prevention and eradication of harassment

In the **Human Rights Policy**, Inmocemento consolidates its commitment to oppose any kind of violence, harassment or abuse in the workplace, complying with the regulations in force in each country, and ensuring the dignified treatment of all the individuals with whom it works, rejecting any kind of discrimination based on race, colour, gender, language, religion, political opinion, national or social origin, marital status, economic position, disability or any other personal condition.

Reflecting this, the **Code of Ethics and Conduct of the Inmocemento Group**, under the principle of rejection and zero tolerance of any conduct involving discrimination or harassment in any of its manifestations, promotes a culture of respect and awareness of harassment, ensuring, among others, the agility of complaint mechanisms, guaranteeing the labour rights and social protection of the victims, etc.

In addition, and as a complement to the complaints channel included in the Code of Ethics and Conduct, Inmocemento has a **Protocol for the Prevention and Eradication of Harassment** approved on 7 November 2024, which aims to prevent, resolve and eradicate cases of harassment in the workplace. Once again, the Inmocemento Group is committed to not tolerating the abuse of authority or any kind of harassment, or any other conduct that could create an intimidating, offensive or hostile working environment for employees.

The Protocol, applicable and mandatory for all Inmocemento Group companies in which direct or indirect control of management is exercised and by all persons related to it, regardless of the link that connects them to it, whether they are own staff or from other companies, including those applying for a job, interns, staff on secondment, suppliers, customers, etc., includes a statement of principles, the definition of harassment, the procedure for action against harassment, the guarantee of confidentiality of the process, and the prohibition of retaliation. This Protocol is implemented by the Corporate Compliance Committee and the Corporate *Compliance Officer* and can be found on the Inmocemento Group's corporate website at the following link: <https://www.inmocemento.es/normativa>.

In addition, the Cement Area's nationally applicable **Equality Plan** also devotes a chapter to the prevention of sexual and gender-based harassment, which includes the following measures, among others:

- Promotion of a culture of prevention of sexual and/or gender-based harassment in all areas and levels of the organisation.
- In the event of a complaint, to ensure maximum speed, confidentiality and effectiveness, with particular attention to the victim's privacy.
- Facilitate access for any person to the procedure for the Prevention and Eradication of Harassment in the Company, thus making it possible to report and investigate the facts, activating the protection of victims and guaranteeing their rights.
- Carrying out communication and training campaigns for the prevention and eradication of harassment, covering the entire workforce and including all available procedures in detail.

Actions related to employment: Non-discrimination and Prevention and eradication of harassment

As part of the Inmocemento Group's commitment (MDR-A_02) to prevent workplace, sexual and gender-based harassment (S1-4_02, S1-4_06), and to promote respectful working environments where dialogue and organisational and professional development prevail (S1-4_03, S1-4_07), the following initiatives were launched in 2024 (MDR-A_03) (MDR-A_01, MDR-A_04, S1-4_01):

- Course on "Sexual and gender-based harassment in the workplace", with the aim of raising awareness, raising awareness and inviting action to prevent cases of sexual and gender-based harassment, which was completed in 2024 by a total of 360 employees, all of whom agreed that these courses are essential for identifying the existence of this type of situation, knowing what should not be tolerated and the instruments available for reporting such situations.
- Training on cyberbullying to help identify cyberbullying behaviour, raise awareness of it and reaffirm the Company's commitment to eradicating it. In 2024, 442 employees completed this training, which enabled them to learn about conduct that could be classified as cyberbullying and to be aware of the commitment made by the Company to eliminate it.
- As a reflection of this commitment, the OnBoarding Programme includes key mandatory training courses for the Group, such as the Code of Ethics and Conduct, Workplace and Sexual Harassment, Cyberbullying and Let's Talk about Equality, as well as other mandatory courses on the following relevant subjects, All this with the aim of making it easier for new incorporations to adapt to the Company, providing them with the main essential training to raise awareness and make them aware of the fundamental principles and values of Inmocemento's corporate culture, which must be known and respected in any case.

For Inmocemento, the implementation of the above initiatives and their dissemination to the staff has different information channels available to the Company, such as corporate and business area websites, e-mails, leaflets and informative posters or other media, which are an essential instrument to achieve its objective of eradicating all forms of discrimination and/or harassment at work or *mobbing*, sexual or gender-based in the Company (S1-4_04, S1-4_05).

The Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (Legal Advice, Compliance, Auditing, Data Protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

Inmocemento's HR and Compliance Departments are allocated an annual budget in accordance with the actions to be undertaken, thus enabling the management of the material impacts on the Group's people. At the same time, the management of these impacts is not alien to the rest of the organisation, which participates and is involved depending on the nature of the different actions so that the attention to these issues concerns the organisation as a whole (S1-4_09).

Metrics related to employment: Non-discrimination and Prevention and eradication of harassment

Metrics related to non-discrimination and prevention and eradication of harassment are reported in the section "Incidents, grievances and serious human rights impacts within the workforce, as well as fines, penalties or compensation for the reporting period".

Targets related to employment: Non-discrimination and Prevention and eradication of harassment

From the above it is concluded that it is not necessary to set additional targets in this area (MDR-T_15), insofar as the awareness-raising actions and training courses on harassment described above comply with the established purpose (MDR-T_17) of having an increasingly trained and sensitised workforce in this area with the necessary knowledge to identify any conduct involving discrimination or harassment, as well as knowledge of the channels available to them to report and eradicate this type of conduct.

Independently of the above, the Cement Area **Equality Plan** includes specific targets (S1-5_01, S1-5_02, S1-5_03) such as the dissemination of the Protocol for the Prevention and Eradication of Harassment".

In order to achieve this target and for the purposes of annual monitoring by the Monitoring Committee, the Plan defines, among others, the following indicators:

- Number of hours of training given and number of people trained.
- Number of complaints filed, processed and resolved and indication of action taken.

As indicated above, the rejection and zero tolerance of any conduct involving discrimination or harassment in any of its manifestations, and the promotion of a culture of respect is a cornerstone of Inmoco's culture which is materialised, on the one hand, in constant training and awareness-raising actions and campaigns and, on the other hand, in policies such as the Group's Code of Ethics and Conduct in force since 7 November 2024 (MDR-T_19).

Gender-based violence

Policies related to employment: Gender-based violence

The Inmocemento Group is particularly committed to its work in the fight against gender violence in all its facets, based on two fundamental principles of action: zero tolerance of gender violence and promotion of the social and professional integration of victims.

Likewise, the Cement Area's **Equality Plan** includes an express chapter dedicated to gender violence with specific measures aimed at preventing and eradicating this type of violence, including, among others, the following:

- Guarantee that any female worker who is a victim of gender-based violence can exercise the rights set out in the Workers' Statute and in the Equality Plan.
- Make the criteria for granting loans or advances to female workers who are victims of gender-based violence more flexible in order to meet situations of need.
- Women who are victims of gender-based violence shall have preference in the choice of the period of their holidays.

Actions related to employment: Gender-based violence

Within the framework of this fight against gender violence, in 2024 (MDR-A_03) Inmocemento (MDR-A_02) has promoted the following awareness-raising and support actions to favour the labour insertion and protection of victims of gender violence (MDR-A_01, MDR-A_04, S1-4_01, S1-4_03, S1-4_06, S1-4_07):

- The Company has joined in the celebration of the International Day for the Elimination of Violence against Women on 25 November.
- This year, the training pill "Cycle of Gender Violence and Support Networks" was promoted with the aim of raising awareness among Inmocemento employees about the possibility of breaking the cycle of gender violence through communication and mutual help provided by support networks. In 2024, a total of 353 employees have completed the course and say that they feel more confident in identifying this type of situation and providing help to the victim.
- In line with the above, the Cement Area has an attention mailbox so that women victims of gender violence can report their situation in order to activate the action measures foreseen in the Equality Plan for this group or, if necessary, offer them the necessary assistance by referring them to the appropriate channels to provide specialised, immediate attention adapted to the particular situation of each victim.

In short, the implementation of these initiatives and measures by the Company are fundamental to create a strong and resilient support network for all victims, and to promote the social and professional integration of women victims of this social scourge, thus advancing towards a future and a society without fear (MDR-A_05, S1-4_02).

Most of the actions described apply to all Inmocemento staff, as they are aimed at raising awareness of gender-based violence among staff, as well as providing support

to victims, without prejudice to the fact that some actions are specifically aimed at women who may be victims of gender-based violence, or at specific territorial areas.

The different training and awareness-raising campaigns undertaken make it possible to measure the effectiveness of the actions undertaken, which translates into greater knowledge of the different means and mechanisms of protection available to the victims and their environment (S1-4_04).

The identification and definition of these actions is carried out by the Human Resources Departments of the different business areas, in harmony and coordination with the different departments involved and especially with those associated with Production, thus analysing the negative impacts and designing response actions that are implemented, depending on their nature, through different mechanisms.

These Departments have sufficient and specialised staff to address the needs that may arise and, in the event that internal capacities are not available or in the event that the action in question so requires, external advice is sought (S1-4_05).

Similarly, Inmocemento's HR departments are allocated an annual budget in line with the actions to be undertaken, thus enabling the management of the material impacts on the Group's people. At the same time, the management of these impacts is not alien to the rest of the organisation, which participates and is involved depending on the nature of the different actions, so that addressing these issues concerns the organisation as a whole (S1-4_09).

In addition, the Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

Metrics related to employment: Gender-based violence

Metrics related to gender-based violence are reported under "Incidents, grievances and serious human rights impacts within the workforce, as well as fines, penalties or compensation for the reporting period".

Targets related to employment: Gender-based violence

With the different actions and initiatives implemented by the company described in the previous section, Inmocemento's aim to remedy this impact is achieved (MDR-T_16), which consists of promoting the integration of victims in the workplace and the fight to eradicate this type of violence, so it is not necessary to set additional targets in this respect (MDR-T_15).

Although the Cement Area's **Equality Plan** sets out specific targets aimed at the prevention and eradication of gender-based violence:

- To promote and encourage adequate protection in the workplace for victims of gender-based violence.
- Raise awareness among staff against any act of physical and psychological violence which, as a manifestation of inequality and discrimination on grounds of gender, is perpetrated by a man against a woman, including attacks on sexual freedom, threats, coercion or arbitrary deprivation of liberty.

Safety, health and well-being

Safe working environments

Policies related to employment: Safe working environments

For Inmocemento, guaranteeing safe working environments is an essential principle endorsed in one of its ethical and compliance principles set out in its **Code of Ethics and Conduct**, which establishes that the prevention of occupational risks is a differentiating element for the organisation and an essential requirement to protect the health and safety of employees and collaborators. Similarly, the **Human Rights Policy** reinforces Inmocemento's commitment to action, obliging it both to **(i)** guarantee the safety of its workers and its operations, continuously improving working conditions and creating a safe and healthy working environment, and **(ii)** to take all necessary actions to avoid compromising the safety, health and integrity of its clients and users, also addressing issues such as opposition to forced or compulsory labour, child labour and human trafficking (S1-1_08).

Since 7 November 2024, Inmocemento has also had a **specific safety, health and well-being policy** (S1-1_09), approved by the Board of Directors, which is published and fully accessible at <https://www.inmocemento.es/normativa> (MDR-P_06). This policy is based, on the one hand, on the real and effective integration of health and safety in all its decisions and activities by involving the network of employees, contractors and suppliers in the preventive culture; and on the other, on the assurance of a system of continuous improvement of working conditions that contemplates the highest safety standards (MDR-P_01), thus ensuring the safety, health and well-being of people as a pillar of its business strategy and from its responsibility as a social agent (MDR-P_05), thus aligning itself with the right to a safe and healthy working environment recognised, among others, by the ILO Declaration on Fundamental Principles and Rights at Work (S1-1_07).

The policy is corporate in scope, i.e. it covers the entire organisation and geographical areas, as well as the stakeholders involved: employees, subcontractors and suppliers (MDR-P_02, S1-1_01).

The responsibility for its implementation lies with the management of the Business Areas, through the implementation of area-specific policies that take it as a reference (MDR-P_03).

The Cement Area also has health and safety management systems that have obtained and periodically renew certification in accordance with ISO 45001 standards (S1-1_07, MDR-P_04).

Health and safety management is also supported by the necessary control and guarantee processes to ensure that all decisions comply with the legal framework and internal regulations of each Inmocemento Group company in this area.

Actions related to employment: Safe Working Environments

During 2024 (MDR-A_03) different actions have been developed involving different levels of the organisation with the aim of permanently improving the safety of the workforce (S1-4_07), through the effective control of the risks identified in each Area (MDR-A_04, S1-4_01, S1-4_03, S1-4_06), thus favouring a healthy working environment, involving the workforce directly in campaigns and specific initiatives linked to the promotion of safety, health and well-being (S1-4_02).

Among others, the most important measures in this respect have been the following (MDR-A_01, MDR-A_02):

- Allive 80.0 awareness campaign in the Cement Area, aimed at the workforce of cement factories in Spain, with the aim of raising awareness of the importance of the human factor in the elimination of unsafe behaviour and developing Collective Safety where the safety of all is ensured in the detection and correction of unsafe acts, under the slogan "We trust in the people who save lives". Participation in the different actions of the campaign amounted to 447 participants in the "*field observations*", with a total of 2,342 hours of dedication; 1,512 people in the case studies (701 employees and 811 belonging to contractors and subcontractors), and 452 people in the Goldberg test (identification of possible problems of mental affectation).
- Likewise, in the Cement Area, the second phase of the campaign "Safety is not negotiable" was carried out, awarded as a good preventive practice by the 5th Edition of the Prevencionar Awards, with training sessions in centres in Spain, the UK and Tunisia to consolidate awareness of the main risks. These campaigns, which comprised a total of 218 sessions and 3,556 hours of dedication, were attended by 1,778 people.
- Consideration of health and safety risks derived from climate change. Given the increase in the frequency of meteorological episodes of greater impact, different action procedures and protocols have been defined, aimed at protecting the health and safety of workers in the performance of their work and in work-related travel. On the other hand, specific risk campaigns on exposure to extreme temperatures have been launched.

The monitoring and evaluation of the effectiveness of the actions and initiatives described above depends on the nature of each of them. For example, the degree of participation and *feedback* obtained in the different training programmes such as the Allive 80.0 Awareness Campaign is a key tool for evaluating the impact and acceptance of these actions, as well as assessing, where appropriate, possibilities for improvement and defining new areas of action. Internal audits and management meetings to monitor the system are also carried out periodically (S1-4_04).

With regard to the identification and definition of the different actions, this is a task that is carried out in a coordinated manner by the Occupational Risk Prevention departments of the different business areas, in agreement with the different departments involved and especially with those associated with Production, thus analysing the negative impacts and designing response actions that are implemented, depending on their nature, through different mechanisms (S1-4_05).

In the same way, the Occupational Risk Prevention departments, through the preventive planning documents, have an annual planning of actions in terms of prevention in which the different resources, both material and economic, are defined.

At the same time, the management of these impacts is not alien to the rest of the organisation, which participates and is involved depending on the nature of the different actions, so that attention to these issues concerns the organisation as a whole (S1-4_09).

In addition, the Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

Metrics related to employment: Safe working environments

In 2024, the Inmocemento Group had 12 occupational accidents resulting in sick leave, 11 of which involved men and 1, women. In 2024, the overall accident frequency rate stood at 6.89. Furthermore, these markers remain below the equivalent rates published by the Ministry of Labour in each sector of activity (S1-14_04, S1-14_05).

The **evolution of the main accident and absenteeism rates** is as follows:

- Firstly, the percentage of workers employed and not employed by Inmocemento who are covered by health and safety management systems is 89.26% (S1-14_01).
- The number of fatalities in the Inmocemento Group's own workforce as a result of work-related injuries and illnesses was 1 in 2024 (S1-14_02). There were no fatalities among non-employees in 2024 (S1-14_03).

In addition, the number of cases of occupational diseases of employees in 2024 was 0 (S1-14_06).

- Finally, the number of days lost due to work-related injuries as well as deaths due to occupational accidents among the workforce amounted to 1,016 days in 2024 (S1-14_07).

Targets related to employment: Safe working environments

In general, targets are set annually to reduce accidents in the workplace in the different business areas (MDR-T_15, MDR-T_16). Specifically, the Cement Area, in addition to reducing the accident rate, has established targets aimed at improving awareness of the "main killers" and consolidating operational control of pedestrian safety, application of best preventive practices and specialised training in the handling of mobile machinery.

It should also be noted that another general target for Inmocemento in 2024 has been to advance in the integration of the gender perspective (MDR-T_18) in health and safety management, and to achieve this, the following measures have been carried out (MDR-T_17):

- a working group is active to update and advance integration criteria.
- the computerised risk assessment tools have been parameterised, with the aim of identifying risks, causes and preventive measures from a gender perspective.
- work has been and will continue to be done on the inclusion of the gender perspective in the use and provision of personal protective equipment, taking into account sizes and designs adjusted to female morphology.

Promoting people's health and well-being

Policies related to employment: Promoting people's health and well-being

For Inmocoemto, promoting the health and well-being of people through specific policies aimed at promoting healthy working environments and increasing individual capacity to maintain and improve physical and emotional health and quality of life is another fundamental axis in response to its social commitment and as an element of differential value in terms of competitiveness.

In this regard, and specifically, the **Code of Ethics and Conduct** includes the organisation's commitment to the generation of a healthier lifestyle culture, through the implementation of initiatives aimed at promoting physical exercise, healthy nutrition, health care and healthy habits.

Likewise, the **Safety, Health and Well-being Policy** establishes as one of the main lines of action in this area, the promotion of people's health and well-being through specific policies aimed at promoting healthy working environments and increasing individual capacity to maintain and improve physical and emotional health and quality of life.

Actions related to employment: Promoting people's health and well-being

The health and well-being of employees is an essential axis in the management of Inmocoemto's business model.

With regard to the creation of different projects to promote health and wellbeing, Inmocoemto (MDR-A_02) continues to maintain and generate new initiatives to promote healthy living and health care among its own employees and other stakeholders (S1-4_02). These initiatives and milestones developed in 2024 (MDR-A_03) both at Group level and by the different areas include the following (MDR-A_01, MDR-A_04, S1-4_01, S1-4_03, S1-4_06, S1-4_07):

- In 2024, the Cement and Real Estate Areas took part in the Integral Wellbeing Programme as part of the VIVE SALUDABLE Project, which comprises a series of workshops and awareness-raising activities, in virtual classroom mode, on subjects related to physical and emotional wellbeing, healthy eating and personal care, taking into account the gender perspective and the different generational needs, and which have had a high level of overall satisfaction.
- Likewise, in 2024, the Cement Area has been awarded in the VIVE SALUDABLE Awards for its project "Be and feel well" in the category of Health Promotion.
- Implementation in the Cement Area of the Goldberg scale test during the annual medical check-ups of all personnel in Spain. In 2024, this test was taken by 452 people, who stated that it enabled them to identify the likelihood of cases of anxiety and potential depression.

The monitoring and evaluation of the effectiveness of the actions and initiatives described above depends on the nature of each of them. For example, the feedback obtained by the participants of the Golbert scale test allows the Company to know the degree of satisfaction of the workforce with this type of tool and to define new fields of action with actions and initiatives in this area. Internal audits and

management meetings to monitor the system are also carried out periodically (S1-4_04).

With regard to the identification and definition of the different actions, this is a task that is carried out in a coordinated manner by the Occupational Risk Prevention departments of the different business areas, in agreement with the different departments involved and especially with those associated with Production, thus analysing the negative impacts and designing response actions that are implemented, depending on their nature, through different mechanisms (S1-4_05).

In the same way, the Occupational Risk Prevention departments, through the preventive planning documents, have an annual planning of actions in terms of prevention in which the different resources, both material and economic, are defined. At the same time, the management of these impacts is not alien to the rest of the organisation, which participates and is involved depending on the nature of the different actions, so that attention to these issues concerns the organisation as a whole (S1-4_09).

In addition, the Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S1-4_08).

Metrics related to employment: Promoting people's health and well-being

The health monitoring of employees is carried out periodically by the external prevention services of the business areas. However, Inmocemento pursues the promotion of the health and wellbeing of its employees as a fundamental axis of its corporate culture, developing specific campaigns, such as the aforementioned Golbert scale test, which had 452 participants in 2024.

Targets related to employment: Promoting people's health and wellbeing

The main target in health and wellbeing promotion is to consolidate appropriate information systems, management tools and dashboards to establish sound diagnostics, identify needs and adequately measure the impact of designed initiatives, with effective monitoring (MDR-T_16, MDR-T_17).

On the other hand, the aim is to update the resources for the diagnosis of psychosocial risks at work, taking into account technological and methodological advances in the field (MDR-T_18).

Other issues

Interaction processes

For Inmocemento, internal communication is a key element both in its strategic management and in the development of different procedures for dialogue and direct dialogue with all its employees and their legal representatives, aimed at identifying and channelling the Company's impacts, risks and opportunities, in order to achieve sustainable business management that makes a difference and allows us to adapt to the different current and future challenges that arise (S1-2_01).

To this end, the company has various communication channels - both *online* and *offline* - and numerous channels for dialogue and participation that promote continuous communication and interaction between Inmocemento and its employees in which employees can raise needs or concerns or report any incidents, among other aspects (S1-2_02, S1-2_03, S1-3_01, S1-3_02, S1-3_04, S1-3_05).

As a starting point, Inmocemento's employees can bring any concerns, suggestions or complaints directly to their superiors, either on their own or through the unitary representation or trade unions established for this purpose.

Having said that, the following **channels and means of communication** in Inmocemento stand out:

A. Internal communication channels and social media:

- Corporate website (<https://www.inmocemento.es>): it has a contact form accessible to anyone through the following link: <https://www.inmocemento.es/contacto>.
- Whistleblowing Channel. A communication channel that Inmocemento makes available to staff, as well as to people who are related to the Inmocemento Group (contractors, suppliers, shareholders, volunteers, interns and trainees) to report, anonymously and confidentially, matters or activities that may involve breaches of the Code of Ethics and Conduct or the commission of possible criminal offences. This channel is fully accessible (S1-3_06) from Inmocemento's website¹⁶, by post¹⁷ and email¹⁸ and local channels enabled by the different countries, as well as through a face-to-face meeting at the request of the informant through any of the aforementioned channels.

In addition, the communications received in the whistleblowing channel by any of the aforementioned means will be diligently and rigorously analysed confidentially by the Compliance Committee, which will determine, depending on the facts reported, their classification according to the Inmocemento Group's Internal Information System Procedure (S1-3_07), respecting throughout the procedure the protection of personal data as well as the rights to privacy, honour and the presumption of innocence (S1-3_09).

- Dissemination and awareness campaigns, deployed on the website or in the different work centres, to raise awareness among the workforce on

¹⁶ Through Inmocemento's website at the following link: <https://www.inmocemento.es/canal-etico>

¹⁷ P.O. Box 19312, 28080 - Madrid (Spain)

¹⁸ At canaletico@inmocemento.es

key issues for the Inmocermento Group such as equality, diversity, health, etc.

- Through the launch of various eLearning trainings, the opportunity has been taken to include opinion surveys on the same training topics. The aim of these surveys is to listen to employees and identify actions for improvement, ensuring that training is increasingly effective and aligned with their needs and expectations.
- The Business Areas are also present on key social networks such as YouTube, X (Twitter), Instagram and LinkedIn.

B. Opinion polls:

In addition to the above, Inmocermento carries out anonymous opinion surveys of its employees at the established intervals in the different business areas. These surveys are an important tool in the framework of business management, as they allow the company to know the level of satisfaction of the staff in the different aspects that influence the development of work, and thus detect both those in which improvement actions are necessary and also identify the areas in which the organisation is working properly in order to strengthen them, thus building the loyalty of internal talent.

In this respect, the work climate surveys launched by the Cement Area at the level of the 6 cement factories in Spain and the central offices in Madrid, with a participation of 466 workers (S1-3_08), are noteworthy, among others.

C. Avenues for dialogue and participation with workers and their legal representatives:

With regard to the specific participation processes available to employees through their legal representatives (S1-2_02), who play a key role in the management of Inmocermento's current material impacts in relation to its workforce, depending on the subject matter, are as follows:

- Employment: as regards the participation of the workforce in actions aimed at promoting the creation of direct employment, these are generally instrumented through their legal representation, which transmits to the company the concerns of the workforce in the context of a mature and open social dialogue within their collective procedures or social dialogue roundtables that are held with the established and negotiated frequency, after which the general criteria for action, monitoring and coordination of these measures aimed at reducing and/or mitigating the above impacts are defined or not.
- Development: with regard to the actions aimed at establishing a training proposal and learning offer that promotes the training and personal development of employees, once the different courses or training programmes have been completed, employees are given the opportunity to give their individual *feedback* in an opinion survey so that, after analysis by the Training Departments of the different areas, new initiatives and opportunities for improvement in this area can be identified for future courses.

With regard to professional recognition, promotion and/or internal mobility, it is the employees themselves who, through their hierarchical superior, directly channel their concerns for professional development and growth or by applying for vacancies in other positions in the Company, following the Internal Mobility Procedure.

- Diversity, equality and inclusion: actions aimed at promoting an enriching work environment, free of discrimination or harassment in any form and gender-based violence, as well as favouring diversity and growth of people belonging to under-represented groups, or those at risk of exclusion, are fundamental (S1-2_07):
 - o On the one hand, the Labour Relations staff of the different business areas are responsible for coordinating equality plans and awards and for diversity and disability management.
 - o On the other hand, the Monitoring Committee of the Cement Area Equality Plan, which meets on a regular basis as negotiated therein, in order to ensure the effective achievement of the different initiatives and measures agreed in the previous areas and which are implemented through training courses or awareness-raising campaigns, etc.
- Safety, health and wellbeing, in terms of accidents and in terms of health and wellbeing, Inmoco's different business areas have participation bodies that comply with local legal requirements, such as the Health and Safety Committees in the Cement Area, whose function is to channel queries raised directly by workers through the complaint channel established for this purpose or by their legal representatives in this area.

As a corollary of the above, it should be noted that the agreements par excellence signed by the Company with the social partners in relation to respect for the human rights of its workforce and its corporate values are firmly embodied in the aforementioned Equality Plan and in the Collective Agreements, and that the preparation of the Diagnostic Report on the Situation of Equal Opportunities enables the parties to identify the needs and actions to be taken in matters such as those described above (among others, selection and recruitment processes, training, professional promotion, working conditions, co-responsible exercise of the rights of personal, family and working life, under-representation of women, prevention of sexual harassment and gender-based harassment, gender-based violence, prevention of occupational risks and occupational health), in order to reinforce and improve strategies in these fields (S1-2_05, S1-2_06).

In this sense, there is no single department or role in charge of ensuring the interaction of Inmoco employees and/or their legal representatives, but this competence is given to the corresponding specific department depending on the material impact identified and the channel associated with its management and/or mitigation (S1-2_04).

Human Rights Policy and Commitments

For Inmocoemto, compliance with the **Universal Declaration of Human Rights** is a fundamental element of the Company's corporate culture, values and business model, and as such, it is included in several regulations that form part of the Company's Compliance Model. Specifically:

In the **Code of Ethics and Conduct**, the highest-ranking regulation within the Inmocoemto Group, which aims to guide all the people linked to any of the Group's companies through guidelines for behaviour in ethical, social and environmental matters, following the highest level of demand in the commitment to comply with laws, regulations, contracts, procedures and ethical principles. These regulations include, among others, the Company's declaration to respect the dignity and guarantee of human and fundamental rights and civil liberties of individuals, a commitment that must also be followed by all employees in the performance of their professional activities (S1-1_05, MDR-P_05).

It should also be noted that the Code reminds us that all Inmocoemto Group policies and regulations are mandatory and that they incorporate the requirements of the voluntary principles to which the Group is committed, such as the United Nations Global Compact, the Declaration of Fundamental Principles and Rights at Work and the ILO Conventions.

Likewise, **Inmocoemto's Human Rights Policy¹⁹**, the quintessential regulation in this area, which, in full harmony with the aforementioned Code of Ethics, extends to all employees, partners, collaborators and suppliers with whom Inmocoemto collaborates (MDR-P_02, S1-1_01), definitively strengthens the Company's commitment to human rights, ²⁰by expressly committing to respect and protect the fundamental human and labour rights (S1-1_04) enshrined internationally in the United Nations Universal Declaration of Human Rights and in the ILO Declaration and its 8 fundamental conventions (MDR-P_01, MDR-P_04, S1-1_07).

With regard to the commitments included and assumed by Inmocoemto in this Policy that are relevant to its workforce, the following seven are worth highlighting (S1-1_03):

- **Freedom of association and collective bargaining**
 - Recognise the right of workers to freedom of association and to work constructively with their freely chosen representatives within the national legal framework.
- **Decent and gainful employment**
 - To ensure just and favourable working conditions and decent and gainful employment, in a fair and satisfactory manner, as well as the right to rest and leisure time, in accordance with the country's labour market and labour legislation.
 - Reject any kind of violence, harassment or abuse in the workplace.
- **Forced labour and child labour**
 - Reject forced, involuntary or child labour, the withholding of documentation, or any other form of modern slavery or servitude, as well as any form of torture, cruel, inhuman or degrading treatment.

¹⁹ It is fully accessible as it is hosted on the corporate website at the link: <https://www.inmocoemto.es/normativa> and available (MDR-P_06)

²⁰ This policy specifically addresses human trafficking, forced or compulsory labour and child labour (S1-1_08).

- **Diversity and inclusion**
 - Reject any kind of discrimination based on race, colour, gender, language, religion, political opinion, national or social origin, marital status, economic status, disability or any other personal condition.
- **Health and safety**
 - To ensure the safety of its employees, its operations, as well as its customers and users.
- **Data privacy**
 - To guarantee responsible use of the personal data of its employees and clients and of the information collected in the different international projects.
- **Respect for communities**
 - Establish relationships of respect and credibility with the communities where it carries out its activities.

As mentioned above, the development of the aforementioned commitments and their monitoring is carried out through the Group Sustainability Committee and the corresponding CSR or Sustainability Committees of the businesses (MDR-P_03).

In order to comply with the commitments of the Human Rights Policy, the Group has adopted different consolidated mechanisms and certain policies, standards, procedures and appropriate controls to promote the objective of preventing and mitigating the risks and negative impacts on Human Rights (S1-1_06):

- Regulatory block, corporate governance policies and procedures.
- Protocol for the prevention and eradication of bullying.
- ESG strategies (environmental, social and governance).
- Training and capacity building programmes.
- Awareness-raising actions and campaigns.

The official procedure for due diligence on Human Rights that Inmocemento makes available to all persons or stakeholders, so that they can report any irregularity or infringement affecting fundamental rights, is Inmocemento's whistleblowing channel. Any communication received through the whistleblowing channel will be processed in accordance with the Compliance Model.

Lastly, the **Inmocemento Group's Sustainability Policy**²¹, approved by the Board of Directors on 7 November 2024 and implemented by this body through the Audit and Control Committee, to which the Sustainability Committee, comprising the business areas and the Compliance and Sustainability Department, reports, establishes the Group's foundations, values and commitments to sustainable development. This policy aims to guide the Group's actions to ensure environmental sustainability, contribute to social development and promote exemplary corporate governance. Once again, it ensures the protection of human rights internally and throughout the value chain, thus reinforcing, once again, Inmocemento's commitment to respect human rights.

²¹ It is accessible on the corporate website at: <https://www.inmocemento.es/normativa>.

Characteristics of non-employees in the company's workforce

The Inmocemento Group does not currently have any non-employees in its workforce (S1-7_01).

Coverage of collective bargaining and social dialogue

As we have already mentioned, Inmocemento considers collective bargaining to be the basis for social dialogue between the Company and its employees to identify the different needs and sensitivities of its staff.

As a result of this belief, and in compliance with the commitment set out in the **Human Rights Policy** to collaborate constructively with the legal representatives of employees within the national legal framework, the Company has always been committed to the existence of a constant and fluid social dialogue with the teams, the legal representatives of employees, trade unions and other social agents, in order to promote the establishment of an appropriate framework for labour relations, as well as the mechanisms for dialogue that allow the Company to adapt to the different business and social requirements.

Thus, social dialogue is an essential instrument that promotes consultation and collective bargaining of Inmocemento Group employees, as it not only allows the achievement of collective agreements of general interest, such as the signing of Equality Plans, agreements, and collective agreements of different scopes, among others, but also disseminates the targets of decisions that have a direct impact on it.

Indeed, social dialogue is essential for the Company as a tool to articulate the working conditions of its workforce. In this regard, the Cement Area has several collective bargaining agreements at the work centre or inter-centre level, in whose negotiation the Company participates actively.

Likewise, it is essential for the Inmocemento Group to maintain an adequate network of communication and participation with the social part in preventive matters through the Health and Safety Committee or equivalent bodies established for this purpose, in aspects such as monitoring the planning of preventive measures, accident rate and absenteeism due to illness, emergency measures, health promotion actions, among others.

Finally, the total percentage of employees with **legal representation**, for each country where the Company has significant levels of employment, is broken down below:

	2024
	Social Dialogue
	EEA Employees
0-19 %	
20-39%	
40-59%	
60-79%	
80 100%	Spain

Collective agreements in the field of social relations

Collective bargaining agreements are an important instrument for regulating the working conditions of Inmocermento Group employees, as they regulate essential aspects ranging from wages, working hours, holidays, leave, etc., to occupational health and safety in the broadest sense.

With regard to occupational health and safety, in accordance with the Code of Ethics, the prevention of occupational risks is a differentiating element for the Inmocermento Group and an essential requirement to protect the health and safety of its employees and collaborators. In this sense, it has a strategy and management systems in place in each of its businesses. Moreover, in the Cement Area, these systems are certified in accordance with recognised standards and aligned with the legislation in force in each country.

In Spain, where most of Inmocermento's workforce is concentrated, the clauses that have been most frequently included in the collective agreements signed with regard to occupational health and safety are, among others, the following:

Most included clauses in Collective Agreements	
Prevention Plans: Risk Assessments and technical-preventive action.	Preventive measures: PPE and emergency situations or work with special risks.
Regulations on workers' rights: Participation, training and information.	Health surveillance: Regular medical check-ups.

On the other hand, as regards the percentage of workers covered by collective bargaining agreements, this varies depending on the applicable legislation, the existence of collective bargaining agreements and even worker representation, considering in all cases the commitment to comply with the applicable legislation and/or collective regulations (S1-8_06, S1-8_07).

In Spain, 100% of the Inmocemento Group's employees are covered by collective bargaining agreements (S1-8_01) and, as we have already mentioned, more than 36 collective bargaining agreements in different areas apply (S1-8_02). However, in those countries where there is no conventional regulatory framework, the employment relationship of employees is governed by the provisions of the applicable legal regulations, in compliance with the relevant local legislation.

Likewise, the total percentage of employees covered by **collective bargaining agreements** for the different countries where the Inmocemento Group operates is detailed below (S1-8_02, S1-8_03, S1-8_08):

	2024	
	Negotiation Coverage	
	EEA Employees	Non-EEA Employees
0-19 %		
20-39%		
40-59%		
60-79%		Rest
80 100%	Spain	

Adequate compensation

In accordance with the above, Inmocemento has been guaranteeing its workers an adequate minimum wage, in accordance with the economic, social and legislative conditions existing in the country of reference (S1-10_01).

The ratio of the annual remuneration of the highest paid person to the median annual remuneration of all employees is 12.82 (S1-16_02).

Universal Accessibility for people with disabilities

Inmocemento is aware that accessibility is a key factor for the inclusion of people with disabilities and this is reflected in the aforementioned **Equality, Diversity and Inclusion Policy**, where the Company guarantees all employees, regardless of their physical, mental or sensory limitations, the same opportunities and experiences in the workplace so that each one can give the best of themselves, and at the same time feel safe and fully integrated.

Specifically, in 2024, in some buildings of the Cement Area, such as the central offices in Madrid, circuits with tactile flooring have been incorporated to facilitate accessibility and mobility as well as health and safety for workers, customers and other visitors and suppliers with visual disabilities, thus contributing to the creation of an environment free of obstacles and barriers, which guarantees the full participation and integration of all people, regardless of their abilities.

Incidents, grievances and serious human rights impacts within the workforce, as well as fines, sanctions or compensation for the reporting period

In 2024, no work-related complaints, incidents and claims regarding social and human rights issues have been reported (S1-17_02, S1-17_03, S1-17_04, S1-17_05) communicated through the Inmocemento Group's whistleblowing channel (S1-17_07).

It should also be noted that no serious human rights cases have been reported in 2024 (S1-17_10).

ESRS S2 – Workers in the value chain

Material impacts, risks and opportunities

Based on the double materiality analysis, and in relation to the personnel in the value chain, the impacts of the Inmocemento Group (SBM-3_07) that have been material for stakeholders are identified below.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Working conditions		
(I-S2.1) Creation of indirect employment through the hiring of suppliers and contractors.	CU	UVC
(I-S2.2) Exposure of workers in the value chain to occupational accidents and diseases as a consequence of performing their tasks.	CU	UVC
<p>* Issue dealt with by specific organisational issues.</p> <p> CU: Current ST: Short term MT: Medium term LT: Long term </p> <p> OP: Own operations UVC: Upstream value chain DVC: Downstream value chain </p>		

The Inmocemento Group has relationships with a large number of suppliers in different geographies. Specifically, during 2024, Inmocemento had relationships with 4,804 suppliers, which is a clear indication of the Group's ability to influence the workers in its value chain.

For the purpose of assessing material impacts, risks and opportunities, all workers in the value chain have been considered (S2.SBM-3_01).

Specifically, of the different typology of suppliers, those workers in the value chain that would be subject to material impacts would be (S2.SBM-3_02, S2.SBM-3_03):

- Workers belonging to suppliers involved in phases or operations that are part of the production activity cycle.
- Workers belonging to suppliers who perform their professional services on the company's site or premises.

In the "Supplier Relationship Management" section, within the ESRS G1 - Business Conduct chapter, the typology of suppliers located in the Inmocemento Group's value chain can be consulted.

No material impact has been identified in relation to the development of operations in geographical areas with a high risk of forced or compulsory labour or child labour areas (S2.SBM-3_04). Furthermore, the Group's Human Rights Policy, which the Company extends to its suppliers, opposes any form of forced or compulsory labour, as well as child labour.

Indeed, due to the activities that Inmocemento carries out and its business relationships, the negative material impacts on workers in the value chain are not

specific or unique to the Inmocemento Group, but all of them respond to generalised contexts in the market in general or in the sector of activity in which it operates (S2.SBM-3_05).

Specifically, the Inmocemento Group takes into account the creation of indirect employment through the hiring of suppliers and contractors in all the geographical areas where it is present and the promotion of sustainable practices among suppliers and contractors through the implementation of policies that take into account social and ethical issues affecting the value chain. Inmocemento also follows purchasing procedures that allow it to establish a single methodology for approval. Thus, Inmocemento's supplier approval system allows us to limit risks and also makes it easier for suppliers and contractors to adapt to our requirements (S2.SBM-3_06).

On the other hand, the Group, aware of the health and safety performance of its subcontractors, develops management, in accordance with recognised standards, aimed at controlling and minimising the health risks arising from the nature of the activities carried out by workers in the value chain, risks that could lead to the materialisation of specific events (S2.SBM-3_05). The approval process includes a series of questions related to occupational risk prevention in which the level of maturity of the organisation in this area is analysed, thus identifying groups with particular characteristics, working in particular contexts or carrying out particular activities that may involve a differential treatment when assessing the risk of suffering harm (S2.SBM-3_08).

Material risks and opportunities arising from impacts and dependencies

Supplier management occupies a central place in the value chain, where the choice and collaboration with ethical and sustainable business partners contributes crucially to strengthening the reputation and resilience of the company, avoiding the risk of inappropriate selection or monitoring of suppliers or contractors who do not participate in the principles and values that Inmocemento proclaims and puts into practice in social matters.

In this way, having a supplier and contractor approval and evaluation system in place creates opportunities to limit risks on the one hand, while on the other hand facilitating and encouraging suppliers to adapt to our social requirements and ultimately to choose and collaborate with ethical and sustainable business partners.

No material risks and/or opportunities for workers in the value chain have been identified (S2.SBM-3_07, S2.SBM-3_09).

Management of impacts, risks and opportunities related to workers in the value chain

Procurement of suppliers and contractors

Indirect employment creation

Policies related to indirect employment creation in the value chain

For Inmocemento, its suppliers and contractors are strategic collaborators who play a fundamental role in its activity, supplying the products and services necessary for Inmocemento to develop its activities in accordance with the standards and expectations of the different stakeholders. Likewise, the hiring of suppliers and contractors favours the promotion of indirect employment.

Collaboration with suppliers and contractors is based on the promotion of solid, lasting and mutually beneficial business relationships. In this context, business partners must align themselves with Inmocemento's commitments, being able to demonstrate compliance with the social and other standards set by the company.

In this sense, Inmocemento has several policies and procedures with which it extends its commitments in social matters to its suppliers and contractors, requiring them to accept and comply with the principles and values of the Code of Ethics and Conduct, including the promotion and creation of a working environment that takes into account diversity and fair treatment in order to promote the professional and personal development of its employees, also extending the commitment to not tolerate any kind of discrimination or harassment in the workplace or sexual harassment. It also extends the commitment to comply with occupational health and safety standards, guaranteeing safe and healthy working environments (S2-1_06, MDR-P_01).

In relation to the above, and as an integral part of Inmocemento's Compliance Model included in the aforementioned Code of Ethics and Conduct, the Company has a Protocol for the Prevention and Eradication of Harassment, the scope of which has been expressly extended to all persons related to Inmocemento, regardless of the link between them and Inmocemento, with express mention of suppliers (MDR-P_02).

Inmocemento also offers its suppliers and contractors the Whistleblowing Channel, for which more information is provided in chapter ESRS G1- Business Conduct, and through which any communication related to a breach of the Code of Ethics and Conduct can be registered.

Likewise, the Inmocemento Group, through its Human Rights Policy, approved by the Board of Directors on 7 November 2024 and whose scope of application takes into account its partners, employees and suppliers, is committed to respecting Human Rights (S2-1_02). It is aligned with the United Nations Guiding Principles and the United Nations Universal Declaration of Human Rights (UDHR), as well as with the fundamental principles of the International Labour Organisation (ILO) relating to the fundamental principles and rights at work () and the eight ILO core conventions (S2-1_08).

The development of the commitments and monitoring of this policy is carried out through the Group's Sustainability Committee and the corresponding business

committees, in coordination with the corporate Human Resources and Procurement departments (S2-1_04).

The Inmocemento Group's Human Rights Policy is part of the Group's Compliance Model and is available on the company's website. It extends to all the company's activities and requires equal protection for partners, employees and suppliers, in accordance with the Code of Ethics and Conduct and the commitment to Human Rights set out in Inmocemento's Sustainability Policy (S2-1_03).

As part of the commitments included in the Human Rights Policy, the following should be highlighted, among others (S2-1_01, S2-1_02, S2-1_05, MDR-P_01):

- Inmocemento opposes forced or involuntary labour, the withholding of documentation, or any other form of modern slavery or servitude, as well as any form of torture, cruel, inhuman or degrading treatment.
- Inmocemento respects children's rights and rejects child labour, in compliance with ILO conventions 138 and 182.
- Inmocemento undertakes to take all necessary actions to avoid compromising the safety, health and integrity of its customers and users.

Likewise, the Cement and Real Estate Areas have been applying the FCC Group's Procurement Manual as the base document for the regulation of its commercial relations with suppliers and contractors, approved in 2014 and last revised in 2022, based on the principles of competitiveness, transparency and objectivity, it seeks to stimulate the formation of solid and lasting commercial relations with suppliers, contractors and partners (MDR-P_02).

This Manual sets out the fundamental principles of the purchasing model, the responsibilities and functions, as well as the processes to be followed to comply with the Company's internal rules, applicable legislation and to encourage suppliers to improve their performance in terms of sustainability, establishing obligations, among others, in the following areas (MDR-P_01)

- Prevention of occupational hazards.
- Environmental protection.
- Compliance with the Code of Ethics and Conduct, the Anti-Corruption Policy and the 10 principles of the UN Global Compact.

As part of this process is the Purchasing Procedure for supplier management approved in 2014 and last revised in 2022, headed by the Directorate of the Purchasing Department, which has the following objectives:

1. Establish a single methodology for the approval of Spanish and foreign natural or legal persons in the Purchasing Department's Database of Approved Suppliers.
2. Define a single methodology for the evaluation of their performance once they become successful suppliers of the purchases managed by the CD.

Both the approval and evaluation of suppliers is recorded in the database of the management platform used by the Purchasing department as the Group's main supplier repository.

This comprehensive due diligence process, focused on ESG risk analysis, requires suppliers and contractors to ensure their alignment with the ethical standards set by the company for entering into and maintaining contractual relationships (MDR-P_04).

During this process, different information is requested from suppliers and contractors: financial information, quality certifications and information on their environmental commitment and performance, as well as information on occupational risk prevention. In terms of human resources, during the approval process, information is required on the number of employees, percentage of women, average age and average length of service of the company's staff, equality measures, among other aspects. In this area, it is necessary not to have been sanctioned for any infringement of the Law on Infringements and Sanctions in the social order in the last four years.

Finally, it should be noted that in 2024 there have been no reported cases of non-compliance related to the UN Guiding Principles on Business and Human Rights, the ILO Fundamental Principles and Rights or the OECD Guidelines for Multinational Enterprises affecting workers in the upstream and downstream value chain. (S2-1_09).

Actions related to indirect employment creation in the value chain

As part of its commitment to indirect employment creation through the hiring of suppliers and contractors, Inmocemento (MDR-A_02) is committed to hiring them locally in order to promote the socio-economic development of the communities where Inmocemento operates (MDR-A_01, S2-4_01, S2-4_02, S2-4_06).

Thus, of the total number of national and international suppliers of Inmocemento in 2024 (MDR-A_03), which amounted to 4,804, the number of local suppliers was 4,479, more than 93% (MDR-A_05).

Along the same lines, among the actions carried out in 2024 to foster and favour existing ties with its suppliers, one of the most noteworthy (S2-4_03) was the Supplier's Day. This day, organised by the Purchasing Department and attended by several of the most important suppliers with which the Group works, was organised with the aim of consolidating and strengthening its relationship with suppliers, thanking them for their commitment and dedication. In this way, it was possible to foster a climate of trust where knowledge, experiences and good practices were shared (MDR-A_04).

In this context, and as part of its comprehensive approach to strengthening relations with suppliers, through its supplier and contractor approval and evaluation process, Inmocemento mitigates and avoids negative impacts on workers in its value chain by carrying out a detailed analysis of the social, labour and environmental aspects of each supplier (S2-4_10).

The Inmocemento Group strives to ensure that its business practices are responsible and in line with the principles of respect for human rights. The monitoring and evaluation of the effectiveness of its initiatives is carried out by the Purchasing Department, both Corporate and the different business areas through the effective use of the supplier approval procedure that ensures that the different suppliers with whom Inmocemento has commercial relations are informed and aligned with the Group's commitment and values (S2-4_04, S2-4_05).

In addition, the Inmocemento Group has departments specialising in the analysis of all types of risks or management areas that provide ongoing advice on all matters within their speciality (legal advice, auditing, data protection, etc.) to ensure that the company's practices do not generate impacts or, where appropriate, that these can

be mitigated. In those cases where it is considered necessary, external suppliers with reputable experience are also used (S2-4_07, S2-4_08).

In short, for Inmocemento it is a key material opportunity to have a system of approval and evaluation of suppliers that allows its commercial partners to align themselves with the commitments in terms of social and labour standards that Inmocemento promotes (S2-4_09).

Metrics related to indirect employment creation in the value chain

No serious human rights cases related to the upstream and downstream stages of their value chain have been reported (S2-4_11, MDR-M_01, MDR-M_02).

Targets related to indirect employment creation in the value chain

No targets have been defined in this area by Inmocemento, *insofar* as, as can be seen from the analysis of the results of the actions and metrics, the supplier approval and evaluation procedure favours the creation of indirect employment in the value chain, in order to ensure collaboration with ethical and sustainable business partners (S2-5_01, S2-5_02, S2-5_03, MDR-T_16, MDR-T_17, MDR-T_18, MDR-T_19).

Health and safety in the value chain

The Group is aware of the importance of maintaining a safe working environment, and that its commitments in this area extend to employees in the value chain.

For this reason, regular coordination meetings are held with them. In these meetings, in which representatives of the different companies involved in the development of a project participate, the workers can transmit, without reprisals (S2-3_06), the concerns and needs of the workers in terms of health and safety (S2-3_02, S2-3_03). When dealing with all issues related to the prevention of occupational risks, the actions to be taken are agreed upon and the actions taken are followed up (S2-3_04).

Furthermore, in the Cement Area, in accordance with the ISO 45001 standard, suppliers who access work centres with certain preventive characteristics, such as factories in the case of the Cement Area, are informed about occupational risk prevention.

Likewise, in 2024, the Cement area developed the Allive 80.0 awareness campaign, aimed at cement factories in Spain, with the aim of raising awareness of the importance of the human factor in the elimination of unsafe behaviour and developing Collective Safety where the safety of all is ensured in the detection and correction of unsafe acts, under the slogan "We trust in the people who save lives". A total of 811 people from contractors and subcontractors took part in the different actions of the campaign.)

However, there are no specific procedures for the remediation of negative impacts related to health and safety (S2-3_01).

Policies related to health and safety in the value chain

As described in the chapter "ESRS S1 - Own Personnel", the specific Health, Safety and Welfare Policy includes subcontractors and suppliers, thus covering workers in the value chain (MDR-P_01, MDR-P_2, MDR-P_03, MDR-P_04, MDR-P_05, MDR-P_06).

Actions related to health and safety in the value chain

The Group is aware of the need to engage with companies that share its health and safety commitments, protecting workers in the value chain. For this reason, the Group's approval processes, aimed at minimising the materialisation of risks in its business relations, include specific requirements in the area of occupational risk prevention, which can be consulted in greater detail in the chapter "ESRS G1 - Business Conduct" (MDR-A_01, MDR-A_02, MDR-A_03, MDR-A_04, MDR-A_05).

The Inmocemento Group also investigates all serious accidents that may occur, regardless of whether they affect workers in the value chain or its own personnel, identifying their causes to prevent their occurrence in the future. Furthermore, in the case of fatal accidents, specific meetings are held to coordinate the relevant actions with the subcontracted companies in order to implement, correct or optimise, if necessary, the necessary measures.

In this way, the Group allocates technological and human resources to try to prevent the occurrence of serious health and safety incidents that could affect workers in the value chain (S2-4_12).

Metrics related to health and safety in the value chain

No fatalities or cases of occupational diseases have been recorded in health and safety incidents involving persons belonging to subcontractors (MDR-M_01, MDR-M_02).

Targets related to health and safety in the value chain

The effectiveness of the actions promoted by Inmocemento in its efforts to guarantee safe working environments makes it unnecessary to define specific targets in this (MDR-T_16, MDR-T_17, MDR-T_18, MDR-T_19).

Other issues

Processes for involving value chain workers in impacts

Innocemento maintains relationships of trust and transparency with its suppliers and contractors, through constant dialogue that allows us to understand their expectations and needs, addressing their concerns.

To this end, the Company has various channels of communication, as well as channels for dialogue and participation based on a transparent, honest, truthful and consistent relationship, either directly with the workers in the value chain or with their legitimate representatives. Specifically, the following have been established (S2-2_01, S2-2_02, S2-2_03):

- **Platform for the approval of suppliers**, managed by the corporate Purchasing Department, which guarantees the extension of the scope of social and environmental criteria to its value chain.
- Innocemento Group's **Whistleblowing Channel**, which is a tool that allows to report, confidentially and through a simple form, those potentially irregular activities and behaviours that may involve a breach of the Protocol on harassment at work, sexual and gender-based harassment, the Code of Ethics and Conduct and/or the possible commission of a criminal offence.
- Corporate **website**, with a fully accessible contact form.

Specific Supplier Portal hosted on the Cement Area website, where suppliers can have direct access to different information such as orders, invoices and statistics.

On the other hand, the specific participation processes available to Innocemento for the management of real and potential impacts on workers in the value chain are as follows:

- With regard to the creation of indirect employment, the purchasing and contract management processes with suppliers incorporate risk mitigation and monitoring mechanisms for the identification of legal risks. The business areas have expert teams, supported by the *Compliance* and Procurement Divisions (S2-2_04).
- Commitment to implement the UN Global Compact (S2-2_05).
- With regard to the assurance and fulfilment of commitments to sustainable practices by suppliers and contractors, the Innocemento Group has implemented a process of approval and evaluation, based on a risk analysis, which considers ESG issues (S2-2_06).

Currently, the Innocemento Group does not have specific measures to understand the perspectives of workers who are particularly vulnerable to impacts or at risk of exclusion in the value chain, maintaining its commitment to the principles of equality and non-discrimination in its relations with suppliers and contractors (S2-2_07). Furthermore, the characteristics of the material impact identified do not require the implementation of additional mechanisms in the short and medium term (S2-2_08).



ESRS S3 - Affected Communities

In recent years, global social changes have had a significant impact on the population, especially on those at risk of exclusion due to economic crises, rising unemployment and loss of purchasing power in households. Faced with this situation, society demands a greater commitment from companies in order to contribute to the well-being of communities. To achieve this change, companies must focus on creating solid relationships with their environment, so that they are not only limited to obtaining economic benefits, but can also generate a positive social impact, promoting the development of the territories where they operate and ensuring the well-being of the population.

In order to have a positive impact on society, the Inmocermento Group is committed to making efforts to support communities in vulnerable situations. Below is a more detailed description of how the Group addresses the needs of local communities.

Types of affected communities

As a basis, it is necessary to identify the affected communities that may be materially impacted by the company's activities (S3.SBM-3_01). In this way, for the Business Areas, the following can be distinguished:

Affected communities (S3.SBM-3_02)	
<div> Cement</div>	<ul style="list-style-type: none">- Communities living or working in the vicinity of operation centres, factories or facilities.
<div> Real estate</div>	<ul style="list-style-type: none">- Tenants or buyers of real estate.- Visitors to managed shopping centres.

As described above, the activities carried out by the Areas aim to contribute to the development of urban environments, including communities living or working in the operation centres and collectives at both ends of the value chain (S3.SBM-3_03).

No affected communities with particular characteristics, contexts or activities have been identified as likely to be exposed to increased risk, and no specific groups of affected communities have been assessed as likely to be particularly affected by the impacts of Inmocermento (S3.SBM-3_07).

Interaction processes

With regard to the interaction processes with the affected communities, the Cement Area has established its interaction processes (S3-2_01, S3-2_02, S3-2_03, S3-2_04, S3-2_05, S3-2_06). In this way, it carries out *Focus Groups* and meetings of the regional CASAs (Autonomous Commission for Monitoring the Agreement for the Sustainable Use of Resources). During the 2024 financial year, the CAS of Cantabria and the CASA of Castilla y León were held with the intervention of the Hontoria factory. This collaboration takes place directly with the legitimate representatives and is carried out on an annual basis. The Head of Environment at each plant, and the

Plant Factory Manager of the Plant, are responsible for ensuring that this collaboration takes place and that the results serve as a basis for the company's approach, although the effectiveness of this collaboration is not evaluated. However, it does not have measures in place to understand the perspectives of particularly vulnerable communities.

Although the Real Estate Area has not adopted processes or actions to interact with the affected communities, it has established measures to understand the perspectives of particularly vulnerable affected communities, in accordance with the regulations or recommendations of European, national, regional or local public administrations (S3-2_08).

Material impacts, risks and opportunities

In its comprehensive analysis of impacts, risks and opportunities (IROs), the Inmocemento Group has assessed those related to its affected communities. This analysis has identified priority issues that need to be actively managed to ensure operational excellence and the achievement of business objectives.

The conclusions obtained from the Inmocemento Group's double materiality analysis in relation to affected communities are set out below. Considering that this is the first year that information is reported in accordance with the ESRS, there are no trends with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis carried out, and in relation to the affected communities, the Inmocemento Group has identified the following material positive impacts on stakeholders (S3.SBM-3_04).

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Economic, social and cultural rights of communities			
(I-S3.1) Increase in housing availability due to real estate activity.	Real estate	CU	OP
(I-S3.2) Generation of socio-economic development in the communities in which it operates.	Cement Real estate	CU	OP
* Issue dealt with by specific organisational issues.		CU: Current ST: Short term MT: Medium term LT: Long term	OP: Own operations UVC: Upstream value chain DVC: Downstream value chain

Financial materiality


Likewise, based on the double materiality analysis, no material risks and opportunities are identified for the Business Areas in terms of affected communities (SBM-3_02, S3.SBM-3_06, S4.SBM-3_08).

The positive impacts identified derive from the increase in housing and socio-economic development (SBM-3_05, S3.SBM-3_05). Aware of the effects of their impacts, the business areas that make up the Inmoco Group have implemented measures over the years to mitigate their effects, both on the company and its stakeholders. Therefore, although they are related to the Group's strategy and business model, it is not considered necessary to update these elements for impact management (SBM-3_03, SBM-3_10).

Policies related to affected communities

As a result of the different activities carried out by Inmocemento's business areas, the types of impact on the communities affected may vary. For this reason, the Group has implemented policies adapted to its operations. These policies show the Inmocemento Group's commitment to preventing and mitigating impacts on communities, focusing on impact management, as detailed in indicator SBM-3. Through the establishment of procedures, norms and standards, we seek to ensure compliance and respect for human rights, as well as to promote the well-being of communities (MDR-P_01). These policies are developed in more detail in Appendix V: Policies related to social management.

The general approach to each policy covering the issue of affected communities is described below, and each of these policies is developed in more detail in Appendix V: Policies related to the management of social aspects.

Area	Topics covered (MDR-P_01)	Policy	Brief description (MDR-P_01)
 Inmocemento Group	Respect for communities Respect for the environment	Human Rights Policy Group Inmocemento	It declares its commitment to respect the human rights contained in the United Nations Universal Declaration of Human Rights and those contained in the ILO Declaration on Fundamental Principles and Rights at Work. Furthermore, it establishes a commitment to respect local communities, raising awareness of their rights in terms of natural resources, access to health care, respect for the environment, etc.
	Respectful and credible relations with local communities	Code of Ethics and Conduct Group Inmocemento	The Inmocemento Group, through the Code of Ethics, is committed to establishing respectful and credible relationships with the local communities where it operates. It also undertakes to respect the specific rights of the communities, their structures, territories and resources, in accordance with national and international conventions and regulations, establishing dialogues and minimising impacts on their rights.
	Positive social impact and development	Sustainability Policy Inmocemento Group	The Inmocemento Group integrates social action into its business strategy to contribute to social, cultural, economic and employment development and well-being, improving the quality of life of the people and communities where it operates. The company focuses on transforming cities into inclusive and innovative environments, placing people at the centre of its management. Its framework includes the protection of human rights, community development, promotion of talent, safety and well-being at work, and equality, diversity and inclusion.

The Human Rights Policy, aligned with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises (S3-1_06), includes a commitment to respect communities, which establishes the principle of maintaining relations of respect and trust with the local communities in which it operates, making known the rights they have in terms of natural resources, access to health, education, culture and tradition (S3-1_02). Furthermore, the Group undertakes to respect the specific rights of communities, their structures, territories and resources, in accordance with national and international conventions and regulations, establishing dialogue procedures and minimising any impact on these rights (S3-1_03).

Finally, it includes a commitment to respect the environment, assessing the life cycle of the Group's activities, and to promote best practices and conduct in the management of its consumption, waste and emissions of polluting gases. (S3-1_04)

In order for the fundamental principles contained in this policy to always guide the Inmoco Group's actions in the area of human rights, and in accordance with the UN Guiding Principles on Business and Human Rights, the Inmoco Group defines and implements appropriate mechanisms to exercise due diligence in relation to the identification, prevention, mitigation and response to violations (S3-1_05). To this end, appropriate protocols will be approved for the continuous identification, monitoring and management of the impacts of the Group's activities on human rights, a plan will be developed to raise employee awareness of human rights and to disseminate this Policy internally and externally, and finally, initiatives will be defined to extend the commitments of this Policy to partners and employees.

Largely as a result of these protocols and commitments, there have been no instances of non-compliance with relevant internationally recognised instruments regarding affected communities in Inmoco's own operations or in its upstream and downstream value chain (S3-1_07).



The Group has also established a whistleblower channel, Canal Ético, to report possible negative impacts on affected communities. This channel, aligned with the Code of Ethics and Conduct, allows any violation of the Human Rights Policy to be reported and guarantees the confidentiality and protection of whistleblowers. In addition, priority is given to partnerships with entities committed to human rights and transparency.

Complaints are managed by the Compliance Committee, from receipt to resolution, ensuring adequate measures. Currently, no specific process is in place to assess whether communities are aware of and trust this management, although appropriate whistleblower protection measures and safeguards against retaliation are in place (S3-3_10, S3-3_11, S3-3_12, S3-3_13, S3-3_14, S3-3_15).

Actions related to affected communities

In this scenario, and with the aim of generating a positive impact on local communities, the Inmocemento Group is dedicated to the search for solutions to produce and deliver services in a more optimised way, generating a positive impact on both the social and environmental surroundings of the communities in which it operates.

Below is a description of the main actions carried out in 2024 by the Inmocemento Group's business areas related to material impacts on affected communities, detailed in the SBM-3 indicator (MDR-A_01, S3-4_01, S3-4_08, S3-4_09). These are developed in greater detail in Appendix VI: Actions related to the management of social aspects.

Area	Action	Short description
 Cement	Sponsorship of sporting activities and collaboration in social actions	Foster social and community cohesion, improve relations with local residents and enhance the company's reputation.
 Real estate	Development of subsidised housing developments	Planning and design of projects that meet the requirements for the development of subsidised housing.

The Cement Area has resources such as training, awareness-raising and insurance to ensure the remediation of negative material impacts. In order to minimise environmental impacts, techniques are implemented to reduce emissions and control noise, with monitoring indicators in management committees. In addition, conservation and environmental education initiatives are developed to strengthen the relationship with the affected communities. It should also be noted that this Area has an Environmental Manual and specific procedures for each factory, aligned with the applicable regulations and ISO 14001. Annually reviewed environmental plans are established to manage risks and improve sustainability (S3-4_05, S3-4_06, S3-4_07, S3-4_08, S3-4_09, S3-4_10, S3-4_11).

Metrics related to affected communities

Detailed information on the additional metrics identified within the S3 affected communities section of the ESRS is presented below.

Economic value created and distributed to affected communities

The following table shows the economic value created and distributed among local communities, reflecting the magnitudes in which the Inmoco Group generates wealth through its activities and contributes to the economic well-being of these communities (MDR-M_01).

Economic value created and distributed to affected communities	Amount (thousands €)
Economic value generated	986,162
Turnover	943,927
Other income	42,235
Economic value distributed	998,520
Operational costs	596,271
Staff	74,669
Capital providers	47,276
Taxes	56,536
Community	223,768
Economic value retained	-12,358

The methodology used is based on the accounting practices set out in the Group's financial statements (MDR-M_02).

Local complaints and incidents


Finally, detailed information is provided on the number of complaints, claims and incidents reported by local communities (MDR-M_01).

Local complaints and incidents	2024
No. of complaints and grievances from local communities	4
No. of incidents involving loss of community data	0

The above data have been compiled from the tools available from Inmocemento's business areas (MDR-M_02).

Targets related to affected communities

In order to measure, monitor and control, the Cement Area has defined a quantifiable target to manage the impact detailed in indicator SBM-3, which is briefly described below. In Appendix VII: Targets related to the management of social aspects, this is developed in greater detail.

Area	Target	Short description
 Cement	Social actions in the communities where it operates	This is a voluntary target consisting of the execution of social actions in the local communities where the Cement Area in Spain carries out its activities.

Due to the activity of the Real Estate Area, it has not adopted measurable and result-oriented targets for its affected communities. On the other hand, it does not yet have a procedure for monitoring the effectiveness of its policies and actions (MDR-T_16, MDR-T_17, MDR-T_18, MDR-T_19).

ESRS S4 - Consumers and end-users

For the Inmocermento Group, the customer is at the heart of its activity and it continually seeks to promote innovation and the marketing of products and services of the highest quality. By developing effective and customised solutions, the Group aims to adapt to the needs of its client portfolio.

This chapter identifies the material impacts, risks and opportunities that may be related to consumers and end users, and sets out the Inmocermento Group's commitments and actions to manage them.

Types of consumers and end-users

As a basis, it is necessary to identify the consumers and end users that may be materially impacted by the activities of the Inmocermento Group (S4.SBM-3_01). In this way, for the two Business Areas, the following can be distinguished:

Consumers and end-users (S4.SBM-3_02)



Cement

- Private customers (buyers of building materials).



Real estate

- Tenants or buyers of real estate.
- Visitors to managed shopping centres.

As described above, the activities carried out by the Inmocermento Group aim to contribute to the development of urban environments. In no case are products or services provided that may be inherently harmful to consumers and end users. However, customers of the Cement Area may need accurate and accessible information on product labelling to avoid possible harmful use (S4.SBM-3_03).

In the Inmocermento Group, and considering the products and services offered, it has not been determined that there are specific groups of consumers and end users that may be particularly affected by the impacts (S4.SBM-3_07).

Interaction processes

Regarding the processes of interaction with end consumers, each of the two Areas establishes its specific process, as this group differs between the different businesses (S4-2_01, S4-2_02, S4-2_03, S4-2_04, S4-2_05, S4-2_06, S4-2_07).

In the Cement Area, interaction with consumers and users is indirect, as they are beneficiaries of the products purchased by customers. As such, the perspectives of users must be taken into account by customers, most of whom are private companies in the construction sector, with sales to private customers being residual.

Lastly, and in relation to the activities of the Real Estate Area, specific communication channels have been established for homebuyers and tenants. By means of e-mail addresses, interaction on real estate portals or via the website, the Area aims to continuously capture the perspectives and satisfaction of these groups through direct dialogue.

Material impacts, risks and opportunities

In its comprehensive analysis of impacts, risks and opportunities (IROs), the Inmocemento Group has assessed those related to its affected communities. This analysis has identified priority issues that need to be actively managed to ensure operational excellence and the achievement of objectives.

For each of the dimensions covered in the materiality analysis, the material impacts and risks for the Inmocemento Group are shown below. Considering that this is the first year that information is reported in accordance with the ESRS, no trends are presented with respect to previous years (SBM-3_11).

Impact materiality

Considering the Group's relationships with consumers and users described above, the following material impacts have been identified:

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Privacy			
(I-S4.1) Exposure of consumers' and end-users' private data, due to the management and storage of information.	Cement	CU	OP
Health and safety			
(I-S4.2) Development and management of secure buildings and infrastructure	Real estate	CU	OP
Access to products and services			
(I-S4.3) Enable the population's access to basic construction goods, such as cement, through practices that protect free competition.	Cement	CU	OP

* Issue dealt with by specific organisational issues.

CU: Current
ST: Short term
MT: Medium term
LT: Long term

OP: Own operations
UVC: Upstream value chain
DVC: Downstream value chain

Financial materiality

For the financial dimension, the Group has identified the following material risks, all of which are connected to the impacts identified above (S4.SBM-3_06).

Risk/opportunity (SBM-3_02)	Type	Area	Financial effects (SBM-3_08, SBM-3_09)	Location (SBM-3_02)
Privacy				
(F-S4.1) Cyber-attacks and personal data loss	R	Cement	Disruptions in operations and increased costs as a result of sanctions and/or information redemptions.	OP
<p>* Issue dealt with by specific organisational issues.</p> <p>R: Risk O: Opportunity</p> <p>M: Possible materialisation in the short term</p> <p>OP: Own operations UVC: Upstream value chain DVC: Downstream value chain</p>				

All of the above impacts are related to the Inmocemento Group's business model, as they can be generated through the provision of products and services aimed at improving the quality of life of citizens and end users (SBM-3_05, S4.SBM-3_05). Therefore, only negative impacts related to specific incidents have been identified, such as possible computer attacks exposing private data or affecting operations (S4.SBM-3_04). As can be seen, the material risk of the Inmocemento Group is related to the Cement Area. However, although vulnerable groups may be more affected by material impacts, it is not considered that the risk can be related to specific consumer groups (S4.SBM-3_08). Aware of the effects of their impacts and risks, the business areas that make up the Inmocemento Group have implemented measures over the years to mitigate their effects, both on the company and its stakeholders. Therefore, although they are related to the Group's strategy and business model, it is not considered necessary to update these elements for impact and risk management (SBM-3_03, SBM-3_10).



Policies related to consumers and end-users

The Inmocemento Group strives to establish lasting relationships with its consumers and end users, based on mutual trust, offering products and services in line with their needs. The continuous search for excellence, offering products and services of the highest quality that provide added value, is one of the Group's hallmarks.

Proof of this is that the Cement Area maintains management systems focused on guaranteeing quality, meeting customer needs and establishing a culture of continuous improvement.

In addition, the provision of quality products and services generates beneficial impacts on citizens, who benefit from improvements in the infrastructure or public services available.

In relation to the material impacts and risks identified, detailed in indicator SBM-3, the Areas have established the following policies, applicable to all consumers and users (S4-1_01). For each of them, the aspects covered and a brief description are detailed, and Appendix V: Policies related to the management of social aspects can be consulted for further details.

Area	Topics covered (MDR-P_01)	Policy	Brief description (MDR-P_01)
 Cement	Access to products and services	Quality Policy	The policy defines the organisation's commitment to quality in activities, products and services, which is materialised in the manufacture of products with optimum conditions and durability, meeting the needs of customers and complying with the applicable legal requirements.
 Real estate	Health and safety	Sustainability Policy	The Policy defines the company's sustainability objectives. Among them is to promote the wellbeing of current and future occupants, as well as the promotion of health and wellbeing for tenants. Within the framework of this policy, it presides over the development of the Realia Group's activities and is inherent to the commitment and actions of all the companies that make up the Group, aligning itself with the demands of customers and society as a whole.

In addition to the above, and as detailed above, the Inmocemento Group has a Human Rights Policy in line with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises (S4-1_06). It sets out the Group's human rights commitments and, especially for users, recognises the following (S4-1_02, S4-1_03, S4-1_04, S4-1_05, S4-1_06):



- **Health and safety:** Carry out all necessary actions so as not to compromise the safety, health and integrity of clients and users.

- **Data privacy:** Responsible use of personal data and information collected in the different international projects where it operates.

To report possible negative impacts, the Inmocemento Group has established an Whistleblowing Channel, which is also available to consumers and end users. This channel, which is part of the Group's Compliance Model, is assigned a process for investigating notifications, within which, if necessary, measures for the remediation of negative impacts are established. More detailed information on the functioning of this channel can be found in the chapter on Business Conduct (S4-3_01, S4-3_02, S4-3_03, S4-3_04, S4-3_05, S4-3_06, S4-3_07).

Actions related to consumers and end-users

The main actions carried out in 2024 by the Inmoco Group's business areas related to material impacts and risks on consumers and users, detailed in indicator SBM-3, are set out below (MDR-A_01, S4-4_01, S4-4_08, S4-4_09). These are developed in more detail in Appendix VI: Actions related to the management of social aspects.

Area	Action	Short description
 Cement	Renewal and acquisition of new quality control equipment	Renew and purchase equipment to ensure greater control of the process and products placed on the market, as well as the reduction of future quality risks, which could in turn represent risks for consumers and end-users.
 Real estate	Inclusion of green or ESG clauses in contracts Integrate and monitor ESG criteria in the selection and evaluation of suppliers and contractors.	Have ESG-related information from tenants and suppliers and include green clauses or clauses referring to ESG aspects in lease contracts. To make a selection of partners and suppliers so that in the coming years a higher percentage of them include ESG criteria in their procedures, ensuring that these criteria are transferred to contracts and projects.
* Additional actions to make a positive contribution (S4-4_03).		

As the Inmoco Group has a mostly indirect relationship with consumers, it focuses its efforts on providing quality products and services from which users will benefit. In order to maintain excellence and manage negative impacts, the business areas closely monitor customer satisfaction and possible complaints and claims. In this way, possible non-conformities are managed effectively, ensuring a constant alignment between customer needs and the actions developed, and consequently limiting possible adverse effects on consumers (S4-4_05, S4-4_06, S4-4_07, S4-4_10).

As a result of the processes in place, and the constant monitoring of customer satisfaction, no serious cases related to the violation of human rights among consumers and end-users have been reported during the financial year 2024 (S4-4_11).

Metrics related to consumers and end-users

Considering the Inmocermento Group's material impacts and risks, detailed information on the additional metrics identified in relation to consumers and end-users is presented below.

Complaints, claims and incidents

The following table reports the number of complaints and claims from consumers and end-users (MDR-M_01).

Complaints and claims	2024
No. of complaints and claims received	39
No. of complaints and claims resolved	39
Average resolution time	56

The management of customer complaints in the Cement Area is carried out in accordance with Procedure PE/PEN 15 of the Quality Management System. This procedure documents the system for dealing effectively with customer queries and complaints, thereby improving the quality of products and services. An updated list of complaints (register R 15/2 or REN 15/2) is maintained which reflects the status of each complaint. In the case of Real Estate, incident tracking is carried out using Excel (MDR-M_02).

Products and services assessed for their health and safety impacts

Products and services that have been assessed for their impact on the health and safety of consumers and end-users are shown below (MDR-M_01).

Products and services assessed for their health and safety impacts	2024
No. of products and services	730
No. of products and services assessed for health and safety impacts	730
Proportion of products and services evaluated	100%

The data collection methodology for the Cement Area is carried out through the SAP computer system (MDR-M_02).

In the case of Real Estate, health and safety on construction sites is specifically regulated by law, and a specific study is carried out for each action. In heritage buildings, safety risks are analysed in the Self-Protection Plan for each building (MDR-M_02).

Incidents

During 2024, no incidents have been reported, and specifically incidents resulting in the loss of consumers and/or end-users (MDR-M_01).

The methodology for collecting this data for the Cement Area is through direct consultation with the data protection department, which is responsible for the register of incidents (MDR-M_02).

Targets related to consumers and end-users

Due to the activities carried out by the Cement and Real Estate Area, it has not adopted measurable and results-oriented targets for its consumers and end users. On the other hand, it does not currently have a procedure for monitoring the effectiveness of its policies and actions (S4-5_01, S4-5_02, S4-5_03, MDR-T_16, MDR-T_17, MDR-T_18, MDR-T_19).

Other information related to the management of social issues

Appendix V: Policies related to the management of social issues

All the policies related to the social management of the Inmocemento Group and its business areas, which comply with the criteria established by the ESRS, are included below.

Inmocemento Group

Human Rights Policy

Scope (MDR-P_02)	The protection of and respect for human rights is at the heart of the Inmocemento Group's corporate culture and values, and applies to all activities in which the company exercises financial or operational control, regardless of the respective process or location. It is aimed at internal stakeholders. However, the company requires the same respect for human rights - including privacy - from its partners, employees and suppliers in accordance with the current Code of Ethics and Conduct.
Responsible (MDR-P_03)	Board of Directors of the Inmocemento Group
References (MDR-P_04, S4-1_06)	<ul style="list-style-type: none"> – UN Guiding Principles on Business and Human Rights – ILO Declaration on Fundamental Principles and Rights at Work – OECD Guidelines for Multinational Enterprises
Stakeholders (MDR-P_05)	Aimed primarily at internal stakeholders, i.e. employees. The interests of affected communities have been taken into account.
Availability (MDR-P_06)	Code of Ethics and Conduct and Compliance Model available on the website

Code of Ethics and Conduct

Scope (MDR-P_02)	Applicable to all persons linked to any Inmocemento Group company, regardless of the type of contract, position or geographical scope.
Responsible (MDR-P_03)	Board of Directors.
References (MDR-P_04)	<ul style="list-style-type: none"> – United Nations Global Compact. – Declaration on Fundamental Principles and Rights at Work and ILO Conventions
Stakeholders (MDR-P_05)	Funders, clients and rating agencies (through project-specific questionnaires); partners (in the signing of the partner agreement and in the implementation of a compliance model), ASCOM (as members of the Board, collaboration in regulatory development processes).
Availability (MDR-P_06)	Publicly accessible through the Inmocemento Group's website and intranet.

Sustainability Policy. See Appendix II: Policies related to environmental management.

Cement Area

Quality Policy

Scope (MDR-P_02, S4-1_01)	The scope of the quality policy corresponds to the cement, aggregate, mortar and concrete manufacturing activities at the CPV Group's centres in Spain. This policy responds to the needs of customers, complying with all the legal and/or regulatory requirements applicable wherever they are marketed (manufacturing conditions, necessary certifications, compliance with applicable product regulations, correct labelling, etc.).
Responsible (MDR-P_03)	The quality policy is defined by the Spanish Operations Management, and is the maximum expression of the Area's commitment to Quality. – UNE-EN ISO 9001:2015.
References (MDR-P_04, S4-1_06)	The policy is not aligned with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises.
Stakeholders (MDR-P_05)	The policy explicitly mentions the analysis of the organisation's context and the understanding of the needs and expectations of stakeholders. These analyses and studies are developed within GCPV's quality management system.
Availability (MDR-P_06)	The policy is available at all sites, but is not available on the company's website.

Real Estate Area

Sustainability Policy. See Appendix II: Policies related to environmental management.

Appendix VI: Actions related to the management of social issues

The following are those actions related to social management that meet the criteria established by the ESRS, broken down by theme and by business area according to materiality.

ESRS S3- Affected Communities

Cement Area

Sponsorship of sporting activities and collaboration in social actions

Key actions (MDR-A_01, S3-4_01)	This is an action carried out during the year 2024 and to which the Group has been committed for several years, in which the main objective is to promote social and community cohesion, improve relations with local residents and enhance the company's reputation. The action contributes to the achievement of one of our stated objectives, "To contribute to social actions in the local communities where we operate".
Scope (MDR-A_02)	It covers the companies that make up the Cement Area and all those companies or entities in which the Area holds, directly or indirectly, a stake of more than 50% or in which it is entrusted with management.
Time horizon (MDR-A_03)	Indefinite. No deadline at present.
Impact Remediation (MDR-A_04, S3-4_02, S3-4_07)	This action does not provide or cooperate in the remediation of those affected by actual material impacts of the company.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Positive initiatives (S3-4_03)	In this policy, no additional positive initiatives are taken.
Effectiveness evaluation (S3-4_04)	At the end of the financial year, the Sustainability Department monitors the number of actions carried out, as well as the total amount spent on sponsorships and social actions. Once the actions have been carried out, information on the execution of the action is requested in order to disseminate it through the media used by the Group to inform stakeholders of the actions carried out. These sponsorships are approved according to internal procedures by the Planning and Management department. The Internal Audit department is responsible for carrying out regular checks to verify compliance with this procedure, reviewing the requests registered, the approval flows and the evidence of the actions carried out, in accordance with the Group's protocolised procedure.

Real Estate Area

Development of subsidised housing developments

Key actions (MDR-A_01, S3-4_01)	Planning and design of projects that meet the requirements for the development of subsidised housing. The action contributes to the achievement of the policies and objectives by contributing to the access to housing for young and vulnerable groups.
Scope (MDR-A_02)	It covers those geographic areas where the company may have qualified land available for this type of housing.
Time horizon (MDR-A_03)	It is intended to develop the action indefinitely.
Remediation of Impacts (MDR-A_04, S3-4_02, S3-4_07)	This action does not provide or cooperate in the remediation of those affected by actual material impacts of the company, although it does make a small contribution to this national social problem.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Positive initiatives (S3-4_03)	In this policy, no additional positive initiatives are taken.
Effectiveness evaluation (S3-4_04)	The monitoring and effectiveness of this action is carried out continuously, with the commercial department.

ESRS S4 - Consumers and end-users

Cement Area

Renewal and purchase of new quality control equipment

Key actions (MDR-A_01, S4-4_01)	<p>This is an ongoing action to renew and purchase equipment to ensure better control of the process and of the products marketed, as well as to reduce future quality risks, which could in turn represent risks for consumers and end-users.</p> <p>By renewing and acquiring equipment, a greater degree of control of the process and of the products marketed is guaranteed, contributing to the achievement of Inmoco's objectives.</p>
Scope (MDR-A_02)	<p>Renewal and acquisition of equipment has been carried out in the following geographical areas:</p> <ul style="list-style-type: none"> - New RX spectrometer at the Mataporquera factory (Cantabria). - New automatic laboratory at the Hontoria factory. - QCX system upgrade Monjos Factory (Barcelona). - Multiphase C-H analyser Olazagutía factory. - Heat pump Alcalá factory. - BlendExpert V8 control system Alcalá factory. - On-line analyser Hontoria factory. - XRD analyser Monjos factory.
Time horizon (MDR-A_03)	The action is planned to run in parallel in the various factories in the period 2024-2025.
Impact Remediation (MDR-A_04, S4-4_02, S4-4_07)	This is not a remedial action.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Effectiveness evaluation (S4-4_04)	Regular monitoring is carried out at the meetings of the Quality Committee of the Cementos Portland Valderrivas Group in Spain.

Real Estate Area

Inclusion of green or ESG clauses in contracts

Key actions (MDR-A_01, S4-4_01)	<p>Have ESG-related information on tenants and suppliers and include green clauses or clauses referring to ESG aspects in lease contracts.</p> <p>This action generates data that allows for the grouped reporting of environmental issues and to raise awareness among tenants of the correct use of materials and energy.</p>
Scope (MDR-A_02)	National scope (Spain), affects suppliers and external collaborators.
Time horizon (MDR-A_03)	The action is planned to be implemented over 4 years, with annual review.
Impact Remediation (MDR-A_04, S4-4_02, S4-4_07)	By having data on tenants' consumption and emissions, efforts can be made to improve services where appropriate and actions can be suggested.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Effectiveness evaluation (S4-4_04)	In future years by the percentage of green clauses signed compared to the overall number of contracts signed.

Integrate and monitor ESG criteria in the selection and evaluation of suppliers and contractors.

Key actions (MDR-A_01, S4-4_01)	To make a selection of partners and suppliers so that in the coming years a higher percentage of them include ESG criteria in their procedures, ensuring that these criteria are transferred to contracts and projects. This action generates data that allows for the grouped reporting of environmental issues and raises awareness among suppliers and contractors of the correct use of materials and energy.
Scope (MDR-A_02)	National scope (Spain), it includes the entire value chain as it directly concerns suppliers and collaborators and indirectly customers and users.
Time horizon (MDR-A_03)	The action is expected to be completed in 5 years.
Impact Remediation (MDR-A_04, S4-4_02, S4-4_07)	This is not a remedial action.
Progress (MDR-A_05)	Action reported for the first year under ESRS.
Effectiveness evaluation (S4-4_04)	Annual monitoring of the action is carried out.

Appendix VII: Targets related to the management of social issues

The targets related to social management that comply with the criteria established by the ESRS are included below, broken down by subject matter and by business area according to materiality.

ESRS S3- Affected Communities

Cement Area

Social actions in the communities where it operates

Target (MDR-T_02)	
This is a voluntary target consisting of carrying out social actions in the local communities and with stakeholders where the Cement Area in Spain carries out its activities.	
Type of target (MDR-T_03)	Reference value (MDR-T_05)
Absolute	24.00
Base year (MDR-T_06)	Period of application (MDR-T_07)
2020	2030
Intermediate/interim targets (MDR-T_08)	
There are no intermediate targets.	
Description and relationship to policies (MDR-T_01)	It is related to the Area's policies, as they involve commitments such as establishing respectful and credible relations with the local communities where it operates, raising awareness of their rights in terms of natural resources, access to healthcare, education, culture and tradition.
Scope (MDR-T_04)	The target covers all the Group's workplaces in Spain.
Scientific basis (MDR-T_10)	The target has no scientific basis.
Methodologies (MDR-T_09)	For the definition of the target, the actions carried out in 2020 have been taken into account, with the aim of improving their contribution.
Stakeholders (MDR-T_11)	Stakeholders have not been involved in the process of defining the target.
Changes (MDR-T_12)	There has been no change in the target or associated metrics.
Performance and progress (MDR-T_13)	The target is reviewed annually in the Corporate Sustainability Committee, for which the accounting accounts of donations and sponsorships and social action registered in SAP are reviewed. Target reported for the first year under ESRS.
Involvement of affected communities (S3-5_01, S3-5_02, S3-5_03)	Affected communities have not been involved in the process of targeting, monitoring or conclusions and improvements.

Appendix VIII: Tables related to the management of social issues

Dismissals by gender (S1-6_11)

	2024
Men	9
Women	4
Total	13

Dismissals by age range (S1-6_11)

	2024
< 35 years old	4
35-54 years	7
> 54 years old	2
Total	13

Dismissals by functional level (S1-6_11)

	2024
Direction and Management	
Controls	2
Technicians	5
Administrative	2
Various trades	4
Total	13

Distribution of staff by functional level and gender (31/12) (S1-9_01, S1-9_06)

	2024	
	Man	Woman
Direction and Management	49	6
Controls	100	23
Technicians	367	54
Administrative	73	43
Various trades	460	14
Subtotal	1,049	140
Total	1,189	

Distribution of staff by functional level and gender (31/12) (S1-9_02)

2024

	Man	Woman
Direction and Management	4%	1%
Controls	8%	2%
Technicians	31%	5%
Administrative	6%	4%
Various trades	39%	1%
Subtotal	88%	12%
Total	100%	

Family leave (S1-15_03)

No. of employees who have taken family leave				% Employees entitled to take family leave
Men	Woman	Total	Total	
32	6	38	3.19%	100%

Governance Disclosures

ESRS G1 – Business Conduct

The current economic and social context has led companies to operate in an increasingly complex marketplace, with a constantly changing regulatory environment, where compliance risks are increasing.

This implies the need for a strong ethical and integrity framework to ensure that all those involved in the organisation's activities ensure compliance and exemplary business conduct.

To this end, Inmocemento has adopted, since its incorporation, a high standard Compliance Model as a result of its previous application and experience in FCC.

Based on the Code of Ethics and Conduct, this system not only makes it possible to detect and avoid risks of non-compliance, but also establishes the foundations of the Inmocemento Group's corporate culture, built on the values shared by all its members.

Throughout this chapter, the results of the Inmocemento Group's double materiality analysis are presented and, based on them, the main policies, actions, metrics and targets related to business conduct issues are described. In accordance with this analysis, the following issues are addressed in this chapter:

- Ethics and corporate culture, whistleblower protection.
- Supplier relationship management.
- Fight against corruption and bribery.

Material impacts, risks and opportunities

For Inmocemento, business conduct is intended to be a sign of identity and a fundamental element in the Group's sustainability, as it defines the ethical bases that guide the day-to-day work of all its members.

For each of the dimensions covered in the materiality analysis, the material impacts and risks for the Inmocemento Group are shown below. Considering that this is the first year that information is reported in accordance with the ESRS, no trends are presented with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis carried out, and in relation to business conduct, the Inmoco Group has identified the following material impacts on stakeholders.

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Corporate culture			
(I-G1.1) Promotion of responsible business conduct through the application of the Compliance Model, generating a fairer, more equitable and sustainable business environment, and increasing stakeholder confidence.	Cement Real estate	CU	OP
Supplier Relationship Management			
(I-G1.2) Promotion of sustainable practices among suppliers and contractors through the implementation of procurement policies and procedures.	Cement Real estate	CU	OP
Fight against corruption			
(I-G1.3) Strengthening the rule of law by promoting law enforcement and reducing impunity.	Cement Real estate	CU	OP
(I-G1.4) Strengthening confidence in public and private institutions by consumers, investors and other stakeholders.	Cement Real estate	CU	OP
(I-G1.5) Promotion of ethical behaviour of affected parties through the management of incidents by the company, with the application of corrective measures and sanctions.	Cement Real estate	CU	OP

* Issue dealt with by specific organisational issues.

CU: Current term
ST: Short term
MT: Medium term
LT: Long term
OP: Own operations
UVC: Upstream value chain
DVC: Downstream value chain

The above positive impacts are mainly the result of the culture of ethics and compliance fostered in the Inmoco Group, and are not directly linked to the Group's business strategy or to the products and services it offers.

As these impacts are positive and not linked to the business strategy, they do not require specific management and therefore do not require updating (SBM-3_05, SBM-3_03, SBM-3_10).

Financial materiality

The Group has also identified a number of material risks and opportunities to manage in the areas of business conduct, supplier management and anti-corruption, which are set out below.

Risk/opportunity (SBM-3_02)	Type	Area	Financial effects (SBM-3_08, SBM-3_09)	Location (SBM-3_02)
Corporate culture				
(F-G1.1) Eligibility for government grants and funding schemes and programmes that promote sustainability in business activities.	O	Cement Real estate	Additional income and access to alternative sources of funding (M)	OP
(F-G1.2) Establish agreements with other companies for the offer of complementary services.	O	Cement Real estate	Increased revenue as a result of attracting new customers (M)	OP
Supplier Relationship Management				
(F-G1.3) Ensure a constant supply of high-quality products and services, and potential development of new products and solutions.	O	Cement Real estate	Increased revenues from the development of new products and solutions (M)	OP
Fight against corruption				
(F-G1.4) Potential weaknesses in internal controls, leading to non-compliance not detected in time.	R	Cement Real estate	Reputational damage and increased costs as a result of sanctions.	OP
(F-G1.5) Possible incidents of corruption, bribery or money laundering related to the company.	R	Cement Real estate	Reputational damage and increased costs as a result of sanctions.	OP
<p>* Issue dealt with by specific organisational matters.</p> <p>R: Risk O: Opportunity</p> <p>M: Possible materialisation in the short term</p> <p>OP: Own operations UVC: Upstream value chain DVC: Downstream value chain</p>				

As with the material impacts, the above risks and opportunities depend on the correct application of the Compliance Model and procurement management procedures, and are not directly linked to the organisation's strategy or to the portfolio of products and services offered.

This is why they do not require specific management, and therefore do not require (SBM-3_03, SBM-3_10).

Corporate culture

Mission, vision and values

Shaped by the mission, vision and values set out below, the Inmocemento Group's culture expresses its identity and the commitment of all its members to contribute to the creation of value and the wellbeing of the communities.

Vision

To be recognised by the society it serves through the establishment of relationships of trust and mutual benefit with its stakeholders, driving the creation of value through the Group's companies and promoting innovation, operational efficiency and the development of high-impact projects that contribute to the economic and social well-being of the communities in which we operate.

Mission

To be a benchmark Group in the global cement and real estate sector, creating value for all our stakeholders and seeking above all the satisfaction of our customers.

Values

Integrity	<i>We make decisions honestly, transparently, respectfully and consistently. We strive to behave in a manner that is above reproach towards our stakeholders.</i>
Customer service	<i>Quality is the basis of our growth. That is why we work in an exemplary and service-oriented manner in our dealings with customers, placing their interests at the same level as our own.</i>
Vocation of leadership	<i>All of us who work in the Group strive for excellence in all areas of activity.</i>
Innovation	<i>We constantly seek solutions that add value to the Group and to the society we serve.</i>
Well-being and development of communities	<i>We are aware of the value that our services bring to society and we are committed to the protection of the natural environment, development and well-being of the communities in which we operate.</i>

The Group's Code of Ethics and Conduct is the main vehicle for maintaining and transmitting Inmocemento's corporate culture, and is the highest standard of the Group's Compliance Model. Approved by the Board of Directors, the Code reflects the Group's mission and vision, and develops in a practical way the values shared by the organisation. The aim is to strengthen a culture of compliance and support long-term value creation. This standard is linked to all material IROs identified under corporate culture, and detailed under the requirements of indicator SBM-3.

In terms of corporate culture responsibilities, the functions assigned to the Audit and Control Committee include overseeing the alignment of corporate culture with the organisation's purpose and values, as well as reviewing compliance with internal codes of conduct (G1-1_01).

Compliance Model

In order to foster an ethical and upright culture at all levels of the organisation, the Group has a Compliance Model. Through this, Inmocoemento guarantees that the Group's companies and people act in accordance with the principles established in its Code of Ethics and Conduct and the policies that develop it.

By preventing and detecting risks of non-compliance, the Group strengthens the organisation's internal control. The Compliance Model ensures compliance with laws and regulations in all geographies in which the organisation operates, while at the same time generating trust among stakeholders. The regulatory block that makes up the Model is set out below:



Compliance Model

- Code of Ethics and Conduct
- Crime Prevention Manual
- Compliance Policy
- Anti-Corruption Policy
- Compliance Partner Relationship Policy
- Agent Policy
- Gift Policy
- Tender Policy
- Competition Policy
- Human Rights Policy
- Protocol for the Prevention and Eradication of Harassment
- Internal Information System Policy
- Equality, Diversity and Inclusion Policy
- Rules of Procedure of the Compliance Committee
- Internal Information System Procedure

The Group's areas, formerly as part of the FCC Group and currently within the Inmocoemento Group, continuously strive to strengthen the Compliance Model, assessing its effectiveness, expanding and disseminating its contents, and updating it in accordance with the new applicable regulations. Throughout 2024, the following actions will be carried out:

- Review of the Compliance Model by an external firm for an independent assessment of its maturity. As a result of this review, changes have been incorporated into the regulatory block, approving a Compliance Policy for the Group.
- Annual Monitoring of the Compliance Model by Internal Audit.
- Annual review of Realia's criminal risk assessment and start of the review process for the Cement Area.
- Carrying out two half-yearly self-assessments and certification of the controls and processes designed to minimise the most significant compliance risks.
- Progress in the fulfilment of the Annual Training Plan 2024, in line with the three-year training plan 2024-2026 of Compliance.
- Risk assessment of the agents who market Realia's real estate developments.

Warning mechanisms

At its first meeting in November 2024 following the establishment of the Group, the Board of Directors adopted the Inmocemento Group's Internal Information System Policy.

It sets out the principles and guidelines for handling communications about potential irregularities. Aligned with Directive (EU) 2019/1937 and Spanish legislation to protect whistleblowers, and integrated in the Compliance Model, this policy is applicable to all the companies that make up the Inmocemento Group (MDR-P_01).

This Internal Reporting System Policy recognises the whistleblowing channel as the mechanism that Inmocemento makes available to its stakeholders for the confidential reporting of potentially irregular activities and conduct, as well as possible breaches of the Group's Code of Ethics and Conduct, the Criminal Prevention Model or other internal rules of Inmocemento.

This tool, which is open to notifications from both internal and external stakeholders, is available through different channels: post, Inmocemento's website and other Group companies, intranet, e-mail (canaletico@inmocemento.es), and face-to-face meetings.

All communications, whether nominal or anonymous, are received and analysed diligently, rigorously and confidentially in accordance with the Inmocemento Group's Compliance Model, applying the Policy and Procedure of the Internal Information System and the Protocol for Internal Investigations of the Inmocemento Group. These documents establish the types of analysis and investigations to be carried out independently and objectively, guaranteeing confidentiality and prohibiting reprisals (G1-1_02, G1-1_08).

Retaliation against whistleblowers is expressly prohibited within the Inmocemento Group, in accordance with the provisions of the Code of Ethics and Conduct and the Internal Reporting System Policy and Procedure.

Training and awareness-raising initiatives are regularly promoted on the mechanisms and policies implemented in the Group to protect whistleblowers and whistleblowers who report possible irregularities (G1-1_05).

Through the above measures, the Group aims to foster a transparent, compliance-oriented environment, providing confidence in the reporting of irregularities.

Business conduct training

As part of the FCC Group, until 31 October 2024, the companies that form part of the Inmocemento Group have been subject to the FCC Compliance Model, in which various and numerous training programmes are developed. Specifically, a three-year Compliance training plan is being implemented, which addresses the following topics: Code of Ethics and Conduct, Competition and Anti-Corruption.



Following the spin-off, the Inmocemento Group intends to maintain a line of continuity and define and approve specific training plans on business conduct (G1-1_10).

Supplier Relationship Management

Supplier relationship management is an essential aspect of the Inmocemento Group's business conduct. The way a company interacts with its business partners not only influences its corporate identity, but also the sustainability of its operations. In this sense, Inmocemento ensures that its suppliers and contractors share the values of ethics, transparency and responsibility that guide its operations.

Inmocemento has operations in different activities, which has led to the existence of several differentiated value chains. This diversity requires close collaboration with a large number of suppliers and contractors who provide essential products and services for the development of the activities. At year-end 2024, the Cement Area had relations with 3,826 suppliers managed by the purchasing department of the Spain Market and 894 of the Tunisia Market, to which must be added the suppliers that are in turn managed directly by the activities that the Area carries out in the UK. On the other hand, the Real Estate Area has relations at year-end 2024 with 84 suppliers, all of them in Spain.

The proper functioning of the Group requires the supply of products and services from suppliers and contractors, including the following:

Main inputs	
 Cement	<ul style="list-style-type: none">- Electricity, fuel and water supplies.- Maintenance and repair services for installations.- Supplies of raw materials and consumables.- Transport and logistics services.- Supply of packaging and containers.- Supply and rental of machinery.
 Real estate	<ul style="list-style-type: none">- Electricity and water supply.- Cleaning and security services

To ensure a sustainable supply chain, the Group's suppliers and contractors need to share its ESG culture and commitments. This is the basis of supplier relationship management at Inmocemento, which is supported by the policies, actions, metrics and targets set out below.

Policies related to supplier relationship management

In the Inmocemento Group, collaboration with suppliers and contractors is based on the promotion of solid, lasting and mutually beneficial commercial relationships. The aim of this way of working is for these groups to act not as mere external agents, but as business partners who share the Group's commitments in environmental, social and corporate governance matters.

The role of the Code of Ethics and Conduct in this area, which establishes the basic guidelines to be followed by the Group's partners, employees and suppliers, is fundamental:

- Demonstrate ethical behaviour in business relations, expressing rejection of corruption, bribery and fraud.
- Protect fundamental human and labour rights.

- Demonstrate a high level of commitment to compliance with occupational health and safety standards.
- Respect the environment in all its activities.

In this way, the Group aims to promote sustainable practices among its business partners while ensuring a consistent supply of high quality, mutually beneficial products and services (MDR-P_01, G1-2_02).

Actions related to supplier relationship management

To ensure compliance with the above principles, and to prevent risks from materialising in its business relationships, the Group has implemented a comprehensive approval process.

This process starts, as a general rule, with the request for documentation from the supplier, in order to check that the suppliers meet the necessary requirements for the provision of the service, which varies and can be more or less demanding, depending on the type of supplier, whether or not they have to enter the facilities, or the type of task they have to carry out, among others. There are a series of procedures that articulate this approval process (MDR-A_01, MDR-A_02, MDR-A_03).

For the Cement Area, procedure PC-00 - General Purchasing Policy and Procedure, which sets out the basic lines of the department and defines the rest of the procedures. Two of these procedures described above form a fundamental part of the supplier approval process:

- PC-02: Supplier Relationship Procedure.
- PC-04: External Services Procedure.

Chapter 4 of the PC-02 defines the supplier master as the database included in SAP where all the information of the suppliers of the Cement Area is collected. The management of the supplier master (registrations, cancellations and modifications) is the responsibility of the purchasing department. There are a series of key data to proceed with the registration of a supplier, these are: company name, VAT number, bank account, profile and payment method. Any modification or registration requires the approval of the purchasing manager.

The selection and registration of suppliers must be based on criteria of cost savings or improvements in the quality of materials or services. The responsibility for approving the registration of a new supplier lies with the purchasing manager. Proposals for registration must be addressed to the material master manager, detailing the needs that motivate the registration, with a copy to the director of the material master.

There are three main types of suppliers in the Cement Area: material suppliers, material suppliers with factory access (mmpp, fuels, etc.), and service suppliers. In the Real Estate Area, the main suppliers are: Construction companies, architectural firms, engineering firms and service providers.

In the case of the approval of service suppliers, there is a step prior to the supplier's registration in SAP, which consists of the registration and approval of these suppliers in the SGRED platform. As mentioned in chapter 3.3.2 of the PC-04, the purchasing department will approve the supplier once it has provided the documentation detailed in IT.04.01: Supplier approval documentation. This includes all the legal and health and safety documents that the service supplier must have in force in order to be

approved. In addition, IT. 04.02- Contract and transport access documentation, lists the documents to be provided by the supplier depending on the scope of the work to be carried out.

It should also be noted that if an active supplier does not provide a service or supply a material for five years, this supplier will be marked as blocked, and it will be necessary to resubmit the updated documentation in order to proceed with its reactivation (G1-2_03, MDR-A_04, MDR-A_05).

Metrics related to supplier relationship management

In order to ensure the correct functioning of the Cement Area's approval process, its suppliers are continuously monitored through the computer tools available to the Purchasing Department.

At year-end 2024, the Cement Area in Spain has a total of 3,826 approved suppliers and contractors, of which 241 correspond to new suppliers.

On an annual basis, and in accordance with the quality policy, the Evaluation of Service Suppliers and the Evaluation of Raw Material Suppliers are carried out, following the guidelines of procedures PE-01 and PE-24 - Quality System.

Regarding the Tunisian market, the Cement Area has 894 active suppliers, of which 781 are local. During the financial year 2024, 57 new suppliers have been registered, all of them local.

As for the Real Estate Area, there are 84 active suppliers, 100% of which are local. In 2024, no supplier homologation has been carried out (MDR-M_01, MDR-M_02).

Targets related to supplier relationship management

With a view to strengthening the Cement Area's procurement management in 2024, Spain has implemented a supplier tool that complements the existing tools. This tool evaluates suppliers in terms of ESG. To do so, suppliers are asked to answer a questionnaire and upload evidence of key documents on the platform, which is checked externally by the service provider. This allows suppliers to be assessed in order to minimise financial, environmental, social, operational, cybersecurity, geopolitical and *compliance* risks. To date, 101 suppliers have been evaluated. The group's aim is to contact those suppliers with the worst ranking in order to help them improve their ESG performance (G1-2_03, MDR-T_16, MDR-T_17, MDR-T_18, MDR-T_19).

Fighting corruption and bribery

Corruption-related practices undermine trust in institutions, both public and private, and contribute to the creation of an unequal, inequitable and discriminatory business environment.

Inmocemento aims to maintain exemplary conduct and ensure respect for the law. These are two of the principles on which the Compliance Model is based, which establishes the Group's zero tolerance to any kind of practices related to corruption, bribery, kickbacks and any form of extortion.

Inmocemento's commitments, the measures implemented, the indicators managed and the targets established are set out below, providing an overview of Inmocemento's management approach to preventing corruption in all its forms.

Policies related to fighting corruption and bribery

In order to prevent the occurrence of practices related to corruption and bribery, Inmocemento has approved, in November 2024, the Code of Ethics and Conduct, as well as various specific policies within the regulatory compliance block:

- **Code of Ethics and Conduct:** Establishes the principle of zero tolerance, and expressly prohibits influencing the will of third parties with the aim of obtaining advantages, favourable treatment or benefits.
- **Anti-Corruption Policy:** Defines the principles applicable in the Group with the aim of preventing corruption, thus complementing and extending the provisions of the Code of Ethics and Conduct.
- **Gift Policy:** Establishes the definition and principles relating to the giving or acceptance of gifts in Inmocemento, which must be observed by all members of the company.
- **Agent Policy:** Determines the general principles that should guide Inmocemento's relationship with any commercial agent or business developer, as well as the basic elements of the procedures for selecting, negotiating and controlling the activity of these operators.

These policies, which form part of the Compliance Model, establish and develop the Group's commitments in anti-corruption matters as a whole. They thus constitute the common principles applicable to the management of the material impacts and risks identified in this area (MDR-P_01).

Actions related to fighting corruption and bribery

The Group's Anti-Corruption Policy details the procedures in place to prevent, detect and address allegations or incidents of corruption and bribery in all operations and throughout the value chain.

In this way, Inmocemento promotes a culture of anti-corruption and bribery, prohibiting any attempt to influence third parties to obtain undue advantages, including any type of facilitation payments to public officials and covert donations. To this end, cash payments are avoided, and actions are taken to monitor the source

and purpose of funds, in compliance with anti-money laundering and anti-terrorist financing regulations (G1-3_01). (G1-3_01)

For its part, the detection of possible irregularities is supported by the Group's whistleblowing channel, the characteristics of which are described above in the section on Corporate Culture (G1-3_02, G1-3_03).

Any employee who violates the provisions of the Anti-Corruption Policy is subject to disciplinary action, up to and including termination of employment and other legal sanctions.

The Group considers that there is, to a greater or lesser extent, a risk of committing corruption offences in all groups. For this reason, the Anti-Corruption Policy is disseminated by e-mail and is available on the intranet and the corporate website (G1-3_05).

Likewise, to reinforce knowledge and understanding of the Policy, the organisation has provided training for its employees (G1-3_07), and with a special focus on executives, middle management and technicians (G1-1_11). During 2024, the following were given (G1-3_06):

- "Zero Tolerance for Corruption" (mandatory for all workers)
- "Tax *compliance*" (mandatory for workers most exposed to tax risk).
- "Awareness-raising on the Code of Ethics and Conduct" (video for *online* and *offline* groups)
- "Conflicts of interest" (information pill launched globally)

In 2024, Inmoco's board members were also trained in compliance (G1-3_08).

Metrics related to fighting corruption and bribery

There is no record of any corruption and bribery non-compliance related to the Group in 2024 (G1-4_01, G1-4_02).

During 2024, *online* anti-corruption training was provided to the following selected groups, based on their functions and exposure to risk. The courses given, recipients and percentage of completion are as follows (G1-4_03):

Training	Target group	Students summoned	Completion (31/12/2024)
Zero Tolerance for Corruption	DI, MI, TE, TC	461	59.4%
Awareness-raising Code of Ethics and Conduct	DI, MI, TE, TC, NC	497	68.6%
Conflicts of Interest	DI, MI, TE, TC	72	94.4%

DI: managers

IM: middle management

TE: technicians

TC: highly qualified technicians

NC: not qualified

Targets related to fighting corruption and bribery

Due to the recent constitution of the Inmocemento Group, the organisation is currently in the process of defining the 2025 anti-corruption targets (MDR-T_15).

In any case, over the course of 2025, it is planned to design and deliver anti-corruption training aimed at the group most at risk of committing corruption offences.

Entity-specific issues

Due to the relevance tax management for the Inmocemento Group, tax compliance has been identified as an entity-specific issue. An entity-specific issue in the context of the CSRD refers to those additional disclosures that, although not included in AR 16, provide users with a detailed understanding of entity-specific impacts, risks and opportunities in relation to environmental, social or governance issues.

Tax Compliance

Tax compliance is a responsibility that contributes to the transparency and proper management of the company. The Inmocemento Group is firmly committed to this premise, aware that the taxes it pays in each of the jurisdictions in which it operates make an essential contribution to the development and progress of the people.

In this way, Inmocemento seeks not only to comply with its tax obligations, but also to take into account the potential impact of its tax decisions on the various communities it serves.

Material impacts, risks and opportunities

In its comprehensive analysis of impacts, risks and opportunities (IROs), the Inmocemento Group has assessed those issues that may be relevant to its own business. This analysis has identified priority issues that need to be actively managed to ensure operational excellence and the achievement of business objectives.

The conclusions obtained from the Inmocemento Group's double materiality analysis in relation to taxes are set out below. As this is the first year that information is reported in accordance with the ESRS, there are no changes with respect to previous years (SBM-3_11).

Impact materiality

Based on the double materiality analysis carried out, and in relation to tax compliance, the Inmocemento Group has identified the following positive impact on stakeholders (S3.SBM-3_04).

Impact (SBM-3_01, SBM-3_04, SBM-3_12)	Area (SBM-3_07)	Horizon (SBM-3_06)	Location (SBM-3_01, 07)
Taxes			
(I-EE.1) Contribution to the financing of public services through the payment of taxes of the organisation*.	Cement Real estate	CU	OP
* Issue dealt with by specific organisational issues.		CU: Current ST: Short term MT: Medium term LT: Long term	OP: Own operations UVC: Upstream value chain DVC: Downstream value chain

Financial materiality

Likewise, based on the double materiality analysis, no material risks and opportunities are identified for the Business Areas in terms of taxes (SBM-3_02, S3.SBM-3_06, S4.SBM-3_08).

The positive impact derives from the socio-economic development to which Inmocemento contributes through the payment of the organisation's taxes (SBM-3_05, S3.SBM-3_05). Aware of the effects of this impact, the business areas that make up the Inmocemento Group seek to implement measures to continue attributing this effect to their stakeholders in subsequent years. Furthermore, although they are related to the Group's strategy and business model, it is not considered necessary to update these elements to manage the impact (SBM-3_03, SBM-3_10).

Policies related to tax compliance

Given its recent incorporation, the Inmocemento Group is in the process of implementing its own policies in this area (MDR-P_07). However, until 30 October 2024, the FCC Group's policies were applicable, establishing clear guidelines for the proper management of tax risks, compliance with current regulations and contribution to society. Reference is also made to the FCC Group's Tax Code of Conduct and Tax *Compliance* Policy.

Actions related to tax compliance

Inmocemento has not carried out any actions related to the material impact on tax compliance due to its recent creation. However, the Group plans to implement actions in subsequent years (MDR-A_13).

Metrics related to tax compliance

The metrics related to income taxes paid by the Inmocemento Group during the financial year 2024 (MDR-M_01) are presented below.

	2024
Taxes on profits paid 2024 (thousands of €)	19,497

The Inmocemento Group's income taxes in 2024 were calculated in accordance with the tax regulations applicable in each jurisdiction (MDR-M_02).

Targets related to tax compliance

Given the characteristics of the matter, no quantifiable and specific targets have been established in this area, beyond strict compliance with the regulations applicable in the jurisdictions in which the Inmocemento Group operates. Likewise, for the time being, it has not established a procedure for monitoring the effectiveness of its policies and actions (MDR-T_15, MDR-T_16, MDR-T_17, MDR-T_18, MDR-T_19).

Other information related to business conduct and tax compliance

Appendix IX: Policies related to business conduct and tax compliance

Innocemento Group

Internal Information System Policy

Scope (MDR-P_02)	Applicable to all persons linked to any Innocemento Group company, regardless of the type of contract, position or geographical scope.
Responsible (MDR-P_03)	Board of Directors.
References (MDR-P_04)	<ul style="list-style-type: none"> – United Nations Global Compact. – Declaration on Fundamental Principles and Rights at Work and ILO Conventions. – ISO 37002 for the management of whistleblower channels
Stakeholders (MDR-P_05)	Funders, clients and rating agencies (through project-specific questionnaires); partners (in the signing of the partner agreement and in the implementation of a compliance model), ASCOM (as members of the Board, collaboration in regulatory development processes).
Availability (MDR-P_06)	Publicly accessible through the official website of the Innocemento Group.

Anti-Corruption Policy

Scope (MDR-P_02)	Mandatory for members of the Board of Directors, executives and all employees of the Innocemento Group, regardless of position, responsibility or geographical location.
Responsible (MDR-P_03)	Board of Directors.
References (MDR-P_04)	ISO 37001 Anti-Bribery Management.
Stakeholders (MDR-P_05)	Funders, clients and rating agencies (through project-specific questionnaires); partners (in the signing of the partner agreement and in the implementation of a compliance model), ASCOM (as members of the Board, collaboration in regulatory development processes).
Availability (MDR-P_06)	Publicly accessible through the official website of the Innocemento Group.

Gift Policy

Scope (MDR-P_02)	Applicable to all the companies that make up the Innocemento Group, as well as to all its employees.
Responsible (MDR-P_03)	Board of Directors.
References (MDR-P_04)	ISO 37001 Anti-Bribery Management.
Stakeholders (MDR-P_05)	Funders, clients and rating agencies (through project-specific questionnaires); partners (in the signing of the partner agreement and in the implementation of a compliance model), ASCOM (as

	members of the Board, collaboration in regulatory development processes).
Availability (MDR-P_06)	Publicly accessible through the official website of the Inmocemento Group.

Agent Policy

Scope (MDR-P_02)	Applicable to all the companies that make up the Inmocemento Group, as well as to all its employees.
Responsible (MDR-P_03)	Board of Directors.
References (MDR-P_04)	No references to third-party standards or initiatives are included.
Stakeholders (MDR-P_05)	Funders, clients and rating agencies (through project-specific questionnaires); partners (in the signing of the partner agreement and in the implementation of a compliance model), ASCOM (as members of the Board, collaboration in regulatory development processes).
Availability (MDR-P_06)	Publicly accessible through the official website of the Inmocemento Group.

Annex I: Additional information required by Law 11/2018

The following are the reporting requirements under Law 11/2018, which are not covered by the *European Sustainability Reporting Standards* (ESRS).

Environmental disclosures

Environmental assessment or certification procedures

Percentage of activity covered by environmental certifications (ISO 14001):

	2024
ISO 14001 (%)	100

The indicator included corresponds only to the Cement area, as the Real Estate Area does not have the information.

Food waste

Due to the type of activity carried out by the Inmocemento Group, food waste has not been identified as a material issue. However, in those Group centres that have a canteen for employees, the external company that provides the service generally takes measures to optimise food forecasts and reduce food waste.

Social disclosures

ESRS S1 - Own Workforce

Headcount at year-end broken down by gender, age, professional classification, type of contract and working day

Age	2024		
	Man	Woman	Total
< 35 years old	48	6	54
35-54 years	488	73	561
> 54 years old	513	61	574
Total	1,049	140	1,189

Functional level	2024	
	Man	Woman
Direction and Management	49	6
Controls	100	23
Technicians	367	54
Administrative	73	43
Various trades	460	14
Subtotal	1,049	140
Total	1,189	

Type of contract	2024	
	Man	Woman
Indefinite	935	132
Temporary	114	8
Subtotal	1,049	140
Total	1,189	

Type of working day	2024	
	Man	Woman
Complete	953	136
Partial	96	4
Subtotal	1,049	140
Total	1,189	

Annual average by type of contract broken down by gender, age and occupational classification

	2024	
	Indefinite	Temporary
Men	931	113
Women	135	7
Subtotal	1,066	120
Total	1,186	

	2024	
	Indefinite	Temporary
< 35 years old	129	15
35-54 years	561	16
> 54 years old	376	89
Subtotal	1,066	120
Total	1,186	

	2024	
	Indefinite	Temporary
Direction and Management	52	2
Controls	113	4
Technicians	379	38
Administrative staff	113	10
Various trades	409	66
Subtotal	1,066	120
Total	1,186	

Annual average by type of working day broken down by gender, age and occupational classification

	2024	
	Complete	Partial
Men	959	86
Women	136	5
Subtotal	1,095	91
Total	1,186	

	2024	
	Complete	Partial
< 35 years old	143	1
35-54 years	573	3
> 54 years old	379	87
Subtotal	1,095	91
Total	1,186	

	2024	
	Complete	Partial
Direction and Management	52	2
Controls	113	4
Technicians	388	28
Administrative staff	113	10
Various trades	429	47
Subtotal	1,095	91
Total	1,186	

Dismissals by gender, age and occupational classification

Gender	2024
Men	9
Women	4
Total	13

Age	2024
< 35 years old	4
35-54 years	7
> 54 years old	2
Total	13

Functional level	2024
Direction and Management	0
Controls	2
Technicians	5
Administrative	2
Various trades	4
Total	13

Average earnings and their evolution by gender, age and occupational classification

		2024 (€)		
		< 35 years old	From 35 to 54 years old	> 54 years old
Men	Direction and Management	20,782.66	80,673.51	131,416.96
	Controls	43,848.75	69,662.82	77,264.30
	Technicians	30,877.70	47,381.42	63,841.99
	Administrative staff	13,878.37	33,716.48	45,055.76
	Various trades	31,238.42	38,021.21	44,598.38
Women	Direction and Management	-	74,237.68	264,120.32
	Controls	50,563.83 EUR	72,990.30	74,974.69
	Technicians	33,314.50 EUR	47,785.34	75,284.62
	Administrative staff	22,881.69 EUR	34,371.28	49,563.08
	Various trades	-	30,455.17	33,784.15

Hours of training by gender and professional category

	2024	
	Men	Women
Direction and Management	5	26
Controls	24	26
Technicians	13	17
Administrative staff	14	12
Various trades	14	15

ESRS S3 - Affected Communities

Partnership or sponsorship actions

List of main associations

Cement Area

- Sustainable Cantabria Association (Cantabria Sostenible)
- Cement Manufacturers Association (Oficemen)
- Association of Mortar and SATE Manufacturers (ANFAPA)
- Spanish National Association of Ready Mixed Concrete Manufacturers (ANEPHOP)
- National Association of Aggregate Manufacturers (ANEFA)
- Spanish Association Of Purchasing, Contracting And Procurement Professionals
- CEOE CEPYME CANTABRIA - Affiliation
- Ciment Catalá Catalan Cement Manufacturers' Association of Catalonia
- Confederation of Employers of Andalusia (CEA)
- Navarra Construction Industrial Cluster
- Federation of Industrialists and Merchants of Alcalá de Guadaira (FICA)
- Cement and Environment Foundation (CEMA)
- Fundación Laboral Andaluza del Cemento y el Medio Ambiente (FLACEMA) (FLACEMA)
- Association of Catalan companies involved in the extraction and treatment of aggregates (Gremi d'Arid de Catalunya).
- Gremi Prefabricados y derivados del cemento
- Spanish Institute of Cement and its Applications (IECA)
- Institute of Internal Auditors
- Spanish CO2 Technology Platform

Real Estate Area

- Spanish Association Against Cancer (AECC)
- Sponsorship of the Women's Basketball Team Ferial Plaza Guadalajara
- Sponsor a tree foundation

ESRS S4 - Consumers and end-users

Complaints and claims (No.)

Business area	Received	Managed	Average resolution time (days)
	2024	2024	2024
Cement Area	2	2	-
Real Estate Area	27	27	45

Governance disclosures

ESRS G1 - Business Conduct

Contributions to foundations and non-profit organisations

	2024 (€)
Donations to non-profit organisations and foundations	223,768.00
Sponsorships	38,124.43
Contributions to associations	843,589.32
Other	113,691.68
Total	1,219,173.43

Tables relating to fiscal transparency

Countries Group	Revenue from sales to third parties 2024	Income from intra-group transactions with other tax jurisdictions 2024	Tangible assets other than cash and cash equivalents 2024	Profit Before Tax 2024 (thousands of €)	Taxes on profits paid 2024 (thousands of €)
Andorra	212	0	0	0	0
Austria	148	0	0	0	0
Belgium	1,832	0	0	0	0
Benin	1,200	0	0	0	0
Costa Rica	432	0	0	0	0
Croatia	0	0	4,578	4,494	0
El Salvador	2,418	0	0	0	0
Spain	701,929	13,254	4,091,060	210,315	16,357
United States	35,509	0	116,028	2,487	0
France	7,446	0	0	0	0
Gabon	5	0	0	0	0
Gibraltar	15	0	0	0	0
Italy	3,722	0	0	0	0
Libya	6,856	0	0	0	0

Countries Group	Revenue from sales to third parties 2024	Income from intra-group transactions with other tax jurisdictions 2024	Tangible assets other than cash and cash equivalents 2024	Profit Before Tax 2024 (thousands of €)	Taxes on profits paid 2024 (thousands of €)
Mexico	35,496	0	0	0	0
The Netherlands	8,757	53,563	17,093	945	0
Panama	0	0	213	-7	0
Portugal	5,069	0	0	0	0
United Kingdom	81,760	24,675	27,123	10,237	2,641
Tunisia	51,121	10,306	63,177	4,833	499
Total thousands of €	943,927	101,798	4,319,272	233,304	19,497

Public subsidies received (thousands of €)

Areas	Public subsidies received 2024 (thousands of €)
Cement	414 thousand of €
Real estate	0 thousand of €
Innocemento. S.A.	0 thousand of €
TOTAL	414 thousand €

Contents of the report

Disclosure requirements required by Law 11/2018, of 28 December, on non-financial information and diversity, covered by the Sustainability Report.

The Inmocemento Group has presented some of the information required by Law 11/2018, taking some GRI Standards as a reference, in accordance with GRI 1: Fundamentals 2021.

Requirement Law 11/18	Related standard	Section of the Report	Page
GENERAL INFORMATION			
Business model			
Brief description of the group's business model (including its business environment, organisation and structure)	(ESRS) GOV-1: The role of the administrative, management and supervisory bodies. (ESRS) SBM-1: Strategy, business model and value chain.	ESRS 2 - General Information (<i>Description of the Inmocemento Group, Corporate Governance Structure</i>)	4-8
Geographical presence	(ESRS) SBM-1: Strategy, business model and value chain.	ESRS 2 - General Information (<i>Description of the Inmocemento Group</i>)	4-6
Organisational targets and strategies	(ESRS) SBM-1: Strategy, business model and value chain.	ESRS 2 - General Information (<i>Strategic Approach</i>)	11-23
Main factors and trends that may affect its future development	(ESRS) SBM-1: Strategy, business model and value chain.	ESRS 2 - General Information (<i>Strategic Approach</i>)	11-23
Company policies			
A description of the group's policies on these issues [environmental and social issues, respect for human rights and the fight against corruption and bribery, as well as on personnel, including measures, if any, taken to promote the principle of equal treatment and opportunities for women and men, non-discrimination and inclusion of persons with disabilities and universal accessibility].	(ESRS) Minimum Disclosure Requirement - MDR Policies - P	Other information related to environmental management (<i>Appendix II: Policies related to environmental management</i>) Other information related to the management of social aspects (<i>Appendix V: Policies related to the management of social aspects</i>) Other information related to business conduct and tax compliance (<i>Appendix IX: Policies related to business conduct</i>)	74-75;85-86;210-211
Risk management			
The main risks related to these issues [environmental and social issues, respect for human rights and the fight against corruption and bribery, as well as personnel issues, including measures taken, where appropriate, to promote the principle of equal treatment and opportunities for women and men, non-discrimination and inclusion of persons with disabilities and universal accessibility].	(ESRS) SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.	ESRS E1 - Climate Change (<i>Material Impacts, Risks and Opportunities</i>); ESRS E2 - Pollution (<i>Material Impacts, Risks and Opportunities</i>) ESRS E3 - Water and Marine Resources (<i>Material Impacts, Risks and Opportunities</i>) ESRS E4 - Biodiversity and Ecosystems (<i>Material Impacts, Risks and Opportunities</i>)	34-36; 45-46; 52-53; 58-59; 64-65; 110-111; 114; 159-160; 169-170; 178-179; 194-196; 207-208

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		ESRS E5 - Resource Use and Circular Economy (<i>Material Impacts, Risks and Opportunities</i>) ESRS S1 - Own Staff (<i>Material Impacts, Risks and Opportunities</i>) ESRS S2 - Value Chain Staff (<i>Material Impacts, Risks and Opportunities</i>) ESRS S3 - Affected Communities (<i>Material Impacts, Risks and Opportunities</i>) ESRS S4 - Consumers and end-users (<i>Material impacts, risks and opportunities</i>) ESRS G1 - Business Conduct (<i>Material Impacts, Risks and Opportunities</i>) Entity-specific issues (<i>Material impacts, risks and opportunities</i>)	
Other			
Mention in the report of the national, European or international <i>reporting</i> framework used for the selection of non-financial key performance indicators included in each of the sections.	(ESRS) ESRS 1 General requirements (GRI) 1 - Fundamentals	Appendix I (<i>Basis for preparation of the report</i>) Annex I: Additional information required by Law 11/2018 (<i>Report contents</i>)	24-26; 220
1. ENVIRONMENTAL ISSUES			
Detailed general information			
On current and foreseeable effects of the company's activities on the environment and, where appropriate, on health and safety.	(ESRS) SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.	ESRS E1 - Climate Change (<i>Material Impacts, Risks and Opportunities</i>); ESRS E2 - Pollution (<i>Material Impacts, Risks and Opportunities</i>) ESRS E3 - Water and Marine Resources (<i>Material Impacts, Risks and Opportunities</i>) ESRS E4 - Biodiversity and Ecosystems (<i>Material Impacts, Risks and Opportunities</i>) ESRS E5 - Resource Use and Circular Economy (<i>Material Impacts, Risks and Opportunities</i>)	34-36; 45-46; 52-53; 58-59; 64-65
On environmental assessment or certification procedures	(GRI) 3-3 Management of material topics	Annex I: Additional information required by Law 11/2018 (<i>Environmental information</i>)	212
On resources devoted to environmental risk prevention	(ESRS) E1-3: Actions and resources in relation to climate change policies. (ESRS) E2-2: Actions and resources related to pollution. (ESRS) E3-2: Actions and resources related to water and marine policies. (ESRS) E4-3: Actions and resources related to biodiversity and ecosystems. (ESRS) E5-2: Actions and resources related to resource use and circular economy.	ESRS E1 - Climate Change (<i>Actions related to climate change</i>); ESRS E2 - Pollution (<i>Pollution-related actions</i>) ESRS E3 - Water and Marine Resources (<i>Actions related to water and marine resources</i>) ESRS E4 - Biodiversity and Ecosystems (<i>Actions related to biodiversity and ecosystems</i>) ESRS E5 - Resource use and circular economy (<i>Actions related to resource use and circular economy</i>)	76-81
On the application of the precautionary principle	(ESRS) IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities.	ESRS 2 - General Information (<i>Strategic Approach</i>)	11-23
On the amount of provisions and guarantees for environmental risks	(ESRS) E1-3: Actions and resources in relation to climate change policies.	ESRS E1 - Climate Change (<i>Actions related to climate change</i>);	76-81

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	(ESRS) E2-2: Actions and resources related to pollution. (ESRS) E3-2: Actions and resources related to water and marine policies. (ESRS) E4-3: Actions and resources related to biodiversity and ecosystems. (ESRS) E5-2: Actions and resources related to resource use and circular economy.	ESRS E2 - Pollution (<i>Pollution-related actions</i>) ESRS E3 - Water and Marine Resources (<i>Actions related to water and marine resources</i>) ESRS E4 - Biodiversity and Ecosystems (<i>Actions related to biodiversity and ecosystems</i>) ESRS E5 - Resource use and circular economy (<i>Actions related to resource use and circular economy</i>)	
Pollution			
Measures to prevent, reduce or remediate carbon emissions that seriously affect the environment (also includes noise and light pollution).	(ESRS) E2-1: Policies related to pollution. (ESRS) E2-2: Actions and resources related to pollution. (ESRS) E2-4: Pollution of air, water and soil.	ESRS E2 - Pollution (<i>Pollution-related Policies, Pollution-related Actions, Pollution-related Metrics</i>)	46-50; 74-75; 79-86
Circular economy and waste prevention and management			
Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste	(ESRS) E5-1: Policies related to resource use and circular economy. (ESRS) E5-2: Actions and resources related to resource use and circular economy. (ESRS) E5-5: Resource outflows.	ESRS E5 - Resource use and the circular economy (<i>Policies related to resource use and the circular economy, Actions related to resource use and the circular economy, Metrics related to resource use and the circular economy</i>)	66-72; 74-75; 81; 88
Actions to combat food waste	(GRI) 3-3 Management of material issues	Annex I: Additional information required by Law 11/2018 (<i>Environmental information</i>)	212
Sustainable use of resources			
Water consumption and water supply according to local constraints	(ESRS) E3-4: Water consumption.	ESRS E3 - Water and Marine Resources (<i>Metrics related to Water and Marine Resources</i>)	56
Consumption of raw materials and measures taken to improve the efficiency of raw material use	(ESRS) E5-4: Resource inflows.	ESRS E5 - Resource use and the circular economy (<i>Metrics related to resource use and the circular economy</i>)	68-70
Direct and indirect energy consumption	(ESRS) E1-5: Energy consumption and mix.	ESRS E1 - Climate Change (<i>Climate change related metrics</i>)	38-39
Measures taken to improve energy efficiency	(ESRS) E1-3: Actions and resources in relation to climate change policies.	ESRS E1 - Climate Change (<i>Actions related to climate change</i>)	37; 76-78
Use of renewable energies	(ESRS) E1-5: Energy consumption and mix.	ESRS E1 - Climate Change (<i>Climate change related metrics</i>)	38-39
Climate change			
Significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	(ESRS) E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions.	ESRS E1 - Climate Change (<i>Actions related to climate change</i>)	37; 76-78
Measures adopted to adapt to the consequences of climate change	(ESRS) E1-3: Actions and resources in relation to climate change policies.	ESRS E1 - Climate Change (<i>Actions related to climate change</i>)	37; 76-78
Voluntary reduction targets set for the medium and long term to reduce greenhouse gas emissions and the means implemented to this end.	(ESRS) E1-4: Targets related to climate change mitigation and adaptation.	ESRS E1 - Climate Change (<i>Climate change related targets</i>)	44; 82-85
Biodiversity protection			
Measures taken to preserve or restore biodiversity	(ESRS) E4-3: Actions and resources related to biodiversity and ecosystems.	ESRS E4 - Biodiversity and Ecosystems (<i>Actions related to biodiversity and ecosystems</i>)	61; 80

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Impacts caused by activities or operations in protected areas	(ESRS) E4-5: Impact metrics related to biodiversity and ecosystems change.	ESRS E4 - Biodiversity and Ecosystems (<i>Metrics related to biodiversity and ecosystems</i>)	62
2. SOCIAL AND STAFF ISSUES			
Employment			
Total number and distribution of employees by gender, age, country and occupational classification	(ESRS) S1-6: Characteristics of the undertaking's employees. (ESRS) S1-9: Diversity metrics.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>) Annex I: Additional information required by Law 11/2018 (<i>Social information</i>)	117-120; 192-193; 213-215
Total number and distribution of types of employment contracts			
Average annual number of permanent contracts, temporary contracts and part-time contracts by gender, age and occupational classification			
Number of dismissals by gender, age and occupational classification;	(GRI) 3-3 Management of material topics	Annex I: Additional information required by Law 11/2018 (<i>Social information</i>)	192; 215
Average salaries and their evolution disaggregated by gender, age and professional classification or equal value;	(GRI) 3-3 Management of material topics	Annex I: Additional information required by Law 11/2018 (<i>Social information</i>)	216
Wage gap, the pay for equal or average jobs in society	(ESRS) S1-16: Remuneration metrics (pay gap and total remuneration).	ESRS S1 - Own Staff (<i>Impact, risk and opportunity management</i>)	135-136
The average remuneration of directors and executives, including variable remuneration, allowances, indemnities, payments to long-term savings schemes and any other payments broken down by gender.	(GRI) 3-3 Management of material topics	ESRS 2 - General Information (Role of Governing Bodies in Sustainability) Annex I: Additional information required by Law 11/2018 (<i>Social information</i>)	10; 174
Implementation of work disengagement policies	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	121-122
Employees with disabilities	(ESRS) S1-12: Persons with disabilities.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	132-133
Work organisation			
Organisation of working time	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	122-123
Number of absence hours	(ESRS) S1-14: Health and safety metrics.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	122-123
Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of work-life balance by both parents.	(ESRS) S1-4: Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	122-123
Health and safety			
Health and safety conditions at work	(ESRS) S1-14: Health and safety metrics.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	145-146
Accidents at work, in particular their frequency and severity by gender	(ESRS) S1-14: Health and safety metrics.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	146

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Occupational diseases by gender	(ESRS) S1-14: Health and safety metrics.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	146
Social relations			
Organisation of social dialogue, including procedures for informing and consulting with staff and negotiating with them	(ESRS) S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	151-153
Percentage of employees covered by collective bargaining agreements by country	(ESRS) S1-8: Collective bargaining coverage and social dialogue.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	156-157
Taking stock of collective agreements, particularly in the field of occupational health and safety at work	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	152
Mechanisms and procedures to promote the involvement of workers in the management of the company, in terms of information, consultation and participation.	(ESRS) S1-2: Processes for engaging with own workers and workers' representatives about impacts.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	150-153
Training			
Policies implemented in the field of training	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	124
Total number of training hours per professional category.	(ESRS) S1-13: Training and skills development metrics.	Annex I: Additional information required by Law 11/2018 (<i>Social information</i>)	126-127; 216
Accessibility			
Universal accessibility for people with disabilities	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	130; 133
Equality			
Measures taken to promote equal treatment and opportunities for women and men	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	134-135
Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men), measures adopted to promote employment, protocols against sexual and gender-based harassment; Integration and universal accessibility of persons with disabilities.	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	121; 128; 134; 138; 141
Anti-discrimination and, where appropriate, diversity management policy	(ESRS) S1-1: Policies related to own workforce.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>)	134
3. INFORMATION ON RESPECT FOR HUMAN RIGHTS			
Implementation of human rights due diligence procedures	(ESRS) GOV-4: Statement on due diligence	Appendix I (<i>Mapping of information provided on the due diligence process</i>)	26
Prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and redress possible abuses committed	(ESRS) GOV-4: Statement on due diligence	Appendix I (<i>Mapping of information provided on the due diligence process</i>)	26
Complaints of human rights violations	(ESRS) S1-17: Incidents, complaints and severe human rights impacts. (ESRS) S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions.	ESRS S1 - Own Staff (<i>Impact, Risk and Opportunity Management</i>) ESRS S4 - Consumers and end-users (<i>Actions related to consumers and end-users</i>)	182
Promotion and enforcement of the provisions of the ILO core conventions related to respect for freedom of association and the right to collective bargaining.	(ESRS) GOV-4: Statement on due diligence	Appendix I (<i>Mapping of information provided on the due diligence process</i>)	26

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4. INFORMATION RELATING TO THE FIGHT AGAINST CORRUPTION AND BRIBERY			
Measures taken to prevent corruption and bribery	(ESRS) G1-3: Prevention and detection of corruption and bribery. (ESRS) G1-4: Incidents of corruption or bribery.	ESRS G1 - Business Conduct (<i>Anti-Bribery and Anti-Corruption</i>)	204-207
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Contributions to foundations and non-profit organisations	(GRI) 3-3 Management of material topics	Annex I: Additional information required by Law 11/2018 (<i>Governance information</i>)	218
5. INFORMATION ABOUT THE COMPANY			
Company commitments to sustainable development			
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Impact of the company's activity on local populations and the territory	(ESRS) SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.	ESRS S3 - Affected Communities (<i>Material Impacts, Risks and Opportunities</i>)	168-170
Relationships with local community actors and the modalities of dialogue with them	(ESRS) S3-2: Processes for engaging with affected communities about impacts.	ESRS S3 - Affected Communities (<i>Interaction Processes</i>)	168-169
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Subcontracting and suppliers			
Inclusion of social, gender equality and environmental issues in the procurement policy.	(ESRS) G1-2: Management of relationships with suppliers.	ESRS G1 - Business Conduct (<i>Supplier Relationship Management</i>)	201-202
Consideration in relations with suppliers and subcontractors of their social and environmental responsibility	(ESRS) G1-2: Management of relationships with suppliers.	ESRS G1 - Business Conduct (<i>Supplier Relationship Management</i>)	202-203
Monitoring and audit systems and audit results	(ESRS) G1-2: Management of relationships with suppliers.	ESRS G1 - Business Conduct (<i>Supplier relationship management</i>)	202-203
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Consumer health and safety measures	(ESRS) S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions.	ESRS S4 - Consumers and end-users (<i>Actions related to consumers and end-users</i>)	189-190; 202
Complaint systems	(ESRS) S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns.	ESRS S4 - Consumers and end-users (<i>Interaction processes, Policies related to consumers and end-users</i>)	180; 277
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Tax information			
Country-by-country benefits	(GRI) 207-4 Country-by-Country Reporting	Annex I: Additional information required by Law 11/2018 (<i>Governance information</i>)	218-219
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