



HUMAN RIGHTS POLICY

Global Policy effective as of January 1, 2025

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1. POLICY STATEMENT

The Cemex Group is committed to respecting internationally recognized Human Rights and standards in all its operations and supply chain. To uphold this commitment, the Cemex Group has established a Human Rights program. This program covers a range of processes, tools, guidelines, policies, and initiatives. Among them are our Salient Human Rights identification process, Human Rights self-assessments, risk assessments, risk and impact plans, Global Risk Agenda, Stakeholder engagement management, third-party due diligence process, supplier sustainability assessments, contractor health and safety verification program, Human Rights trainings and audits, and this Human Rights Policy, among others.

This Policy outlines the Cemex Group's: (i) commitment to respect internationally recognized Human Rights and adherence to related international guidelines and standards; (ii) Human Rights Due Diligence ("HRDD") approach to identify, mitigate, monitor, and remediate adverse Human Rights risks and impacts arising out of all phases of our business activities, including but not limited to our operations, relationships, and supply chain; and, (iii) grievance processes in place to receive, investigate and address any Human Rights-related concerns raised by Stakeholders and affected "rightsholders".

Compliance with this Policy is mandatory for all the Cemex Group. The Cemex Group expects Third Parties to uphold the principles of this Policy and respect internationally recognized Human Rights and standards.

2. POLICY INTERPRETATION, IMPLEMENTATION AND ADMINISTRATION

This Policy was approved by the Board of Directors. Additionally, this Policy replaces the Cemex Human Rights Policy dated April 2018.

The Board of Directors and its committees (including the Sustainability, Climate Action, Social Impact, and Diversity Committee) are responsible for supporting and overseeing the implementation of the Cemex Group's Human Rights program, including this Policy.

The activities of the Human Rights Global Committee are reported to the Sustainability, Climate Action, Social Impact, and Diversity Committee, and at least once a year to the Board of Directors. The members of the Human Rights Global Committee report directly to Cemex's Senior Management.

The Human Rights Global Committee is responsible for managing, administering, and implementing this Policy. To fulfill such responsibilities effectively, it may request support from other departments and Business Units within the Cemex Group, as well as from third-party advisors. The Human Rights Global Committee holds ultimate responsibility for the interpretation of this Policy, after consulting with the Cemex Corporate Legal Compliance Department and, if necessary, with internal and/or external legal counsel. The Human Rights Global Committee also has the discretion to develop and/or enhance strategies and develop and design solutions to allow the Cemex Group to comply with this Policy.

This Policy should be observed in strict compliance with any applicable General Framework. When in doubt as to the content or application of this Policy or where there is conflict between applicable legal requirements under this Policy, Employees have an obligation to contact the Cemex Corporate Legal Compliance Department for guidance.

3. GENERAL PROVISIONS

3.1. DEFINITIONS

- “Affiliate” means, with respect to any corporation, limited liability company, trust, joint venture, association, company, partnership, or other entity, another corporation, limited liability company, trust, joint venture, association, company, partnership, or other entity that directly, or indirectly through one or more intermediaries, controls or is controlled by or is under common control with the corporation, limited liability company, trust, joint venture, association, company, partnership, or other entity specified.
- “Board of Directors” means Cemex’s Board of Directors.
- “Business Unit” means any area within the Cemex Group, with personnel, resources or assets. The term “Business Unit” also includes countries, regions, departments, divisions, functional areas (including global initiatives within the Cemex Group), companies or specific facilities (ready-mix plants, quarries, etc.) and their presidents, executive vice-presidents, vice-presidents, directors or Business Unit Leaders.
- “Business Unit Leader” means the head of any Business Unit.
- “Cemex” means Cemex, S.A.B. de C.V.
- “Cemex Corporate Enterprise Risk Management (ERM) Department” means the Cemex Corporate ERM Department or any other department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Corporate Legal Compliance Department” means the Cemex Corporate Legal Compliance Department of Cemex’s Global Legal Department or any other department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Corporate Practices and Finance Committee” means the Board of Directors’ Corporate Practices and Finance Committee, or such other committee as the Board of Directors may, from time to time, appoint to oversee the material risks and opportunities of our internal Global Risk Agenda.
- “Cemex Global Social Impact Department” means the Cemex Corporate Social Impact Department or any other department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Corporate Sustainability Department” means the Cemex Corporate Sustainability Department or any other department which may in the future exercise similar functions in relation to the matters covered herein.

- “Cemex Executive Committee” means Cemex’s executive committee, which reports to Cemex’s Chief Executive Officer.
- “Cemex Group” means Cemex and its Affiliates.
- “Cemex Internal Audit Department” means the Cemex Process Assessment Department or any other department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Local ETHOS Committee” means any Cemex local ETHOS committee that supports the ETHOS Group in overseeing and managing the Global Compliance Program in a specific country, region or Business Unit, or any other local committee which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Local Legal Department” means any Cemex local legal department that supervises a specific country, region or Business Unit or any other local department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Regional Legal Department” means any Cemex regional compliance department or Cemex regional legal department that supervises a specific region or any other regional department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Regional Social Impact Department” means any Cemex regional social impact department that supervises a specific region or any other regional department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Senior Vice President of Legal” means the senior vice president of legal of the Cemex Group or any equivalent position within the Cemex Group which may in the future exercise similar functions in relation to the matters contained herein.
- “Employees” means the individuals who occupy a position in or are directly or indirectly employed by any company of the Cemex Group.
- “ETHOS Group” means the Cemex Group’s body of cross-functional committees at both local and global levels that is responsible for overseeing and managing the Global Compliance Program, or any other body or committee that may exercise similar functions in relation to the matters covered herein.
- “General Framework” means (i) the terms and conditions set forth in this Policy and related guidelines, (ii) applicable international treaties, local laws and regulations to which each Employee is subject, (iii) charter documents (i.e., by-laws, articles of incorporation, etc.) of the Cemex Group, and (iii) any applicable Cemex Group internal policies.
- “Human Rights” are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. They include those human rights recognized in the International Bill of Human Rights and the ILO’s Declaration on Fundamental Principles and Rights at Work.
- “Human Rights Global Committee” means the Cemex Group’s committee in charge of managing, administering, and interpreting this Policy, as well as executing the Cemex Group’s Human Rights program and the processes described herein. The Human Rights Global Committee may be formed by the Cemex Group’s Global Social Impact Director, Global Sustainability Vice President, Corporate Legal Compliance Director, Corporate Enterprise Risk Management and Security

Director, Human Resources Planning and Development Director, Global Health and Safety Director, Center of Excellence Procurement Head, Global Corporate Communication and Public Affairs Director, and senior representatives of any other department which may in the future exercise similar functions in relation to the matters covered herein.

- “Local Communities” means the populations that are local to Cemex Group’s Business Units.
- “Policy” means this Human Rights Policy as may from time to time be changed, amended, restated and/or supplemented.
- “Salient Human Rights Issues” means Human Rights at risk of the most severe adverse impacts as a result of the Cemex Group’s operations or business relationships.
- “Senior Management” means the senior management of the Cemex Group as identified in Cemex’s annual reports filed with the United States Securities and Exchange Commission and the *Comisión Nacional Bancaria y de Valores in Mexico*.
- “Stakeholders” means individuals or entities whose rights or interests are or could be affected by the operations and activities of the Cemex Group. This includes Employees, customers, suppliers, shareholders, investors, analysts, Local Communities, governments and policymakers, business associations, non-governmental organizations (NGOs), and academic institutions.
- “Sustainability, Climate Action, Social Impact, and Diversity Committee” means the Board of Directors’ committee in charge of overseeing sustainability and social responsibility policies, strategies, and programs of the Cemex Group, including but not limited to the oversight of the Human Rights program execution, or any such other committee as the Board of Directors may, from time to time, appoint to oversee such matters.
- “Third Party(ies)” means, but is not limited to, customers, vendors, contractors, subcontractors, including but not limited to security service providers, agents, subagents, custom brokers, freight forwarders, logistics providers, distributors, representatives, business partners, joint ventures, or any other person transacting with or acting on the Cemex Group’s behalf (such as representatives, agents or intermediaries), as well as their employees or other persons working on their behalf.

3.2. HUMAN RIGHTS

STATEMENT OF COMMITMENT

As a global corporate group, the Cemex Group is committed to aligning its strategy and operations with the principles and values set out in international human rights standards, including but not limited to, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and any resolutions or guidelines issued by international organizations regarding the human right to a clean, healthy and sustainable environment.

The Cemex Group is committed to respecting internationally recognized Human Rights in all its operations and supply chain. This includes, but is not limited to:

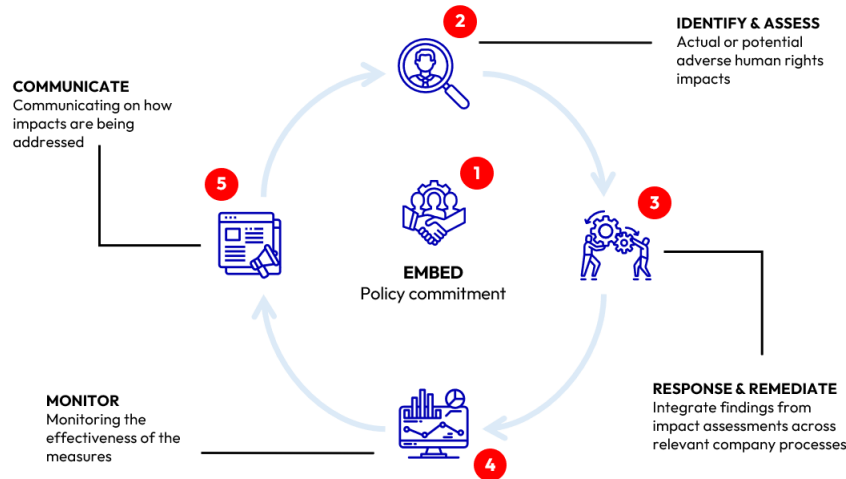
- **The right to safe and healthy working conditions:** We aim to provide Employees and contractors with a safe and healthy workplace in compliance with internal policies and guidelines and applicable local laws and regulations.

- **The right to fair wages, working hours, and employment practices:** We strive to comply with all applicable laws and regulations governing wages and hours, recruitment and employment contracts.
- **The right to freedom of association and collective bargaining:** We are committed to respecting Employees' right to choose freely whether to organize or join associations for the purpose of collective bargaining in accordance with applicable local laws and regulations.
- **The right to a clean, healthy, and sustainable environment:** We are dedicated to respecting the right to a clean, healthy and sustainable environment, acknowledging its role in the full enjoyment of a range of Human Rights, such as the right to food, water and sanitation.
- **The right to non-discrimination:** We aim to foster diversity, equity, and inclusion throughout our workplace. We prohibit discrimination of any kind based on race, color, religion, disability, national origin, genetic information, family responsibilities, pregnancy, breastfeeding, age, sexual orientation, gender, marital status, protected veterans' status, citizenship status, or any other status protected by law.
- **No forced labor, child labor, or human trafficking:** We prohibit reliance on forced, child labor, or any form of physical, sexual or psychological compulsion, exploitation or coercion, including human trafficking, in our operations and supply chain.
- **Respect for communities:** We are committed to respecting the dignity of communities and groups, including vulnerable or marginalized communities and groups, such as indigenous peoples and children.
- **Data privacy:** We are dedicated to managing and processing personal data, including that of Employees and Third Parties, with reasonable privacy and in accordance with applicable laws and regulations.

The Cemex Group is also committed to advancing its business practices to respect Human Rights. As part of this commitment, the Cemex Group actively seeks to participate in Human Rights initiatives and partnerships that further these efforts.

OUR HUMAN RIGHTS DUE DILIGENCE APPROACH

Our HRDD approach aims to integrate a Human Rights risk management system that embeds our commitment to Human Rights while identifying, assessing, responding to, remediating, monitoring, and communicating Human Rights risks and impacts resulting from the Cemex Group's operations, activities, and relationships. This approach is based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. However, the Cemex Group may adapt this approach as needed to meet evolving requirements, directives, and frameworks.



We are committed to integrating our HRDD approach across various departments, as well as existing policies, guidelines, and risk management processes. Our HRDD approach comprises the following elements:

1. **EMBED:** Incorporating the Cemex Group's commitments into its governance, practices, policies, guidelines, and processes.
2. **IDENTIFY AND ASSESS:** Identifying Human Rights and the rightsholders who may be adversely affected by the Cemex Group's operations, activities, and relationships. Analyzing identified risks and adverse impacts in accordance with their corresponding level of risk or adverse impact.
3. **RESPOND AND REMEDIATE:** Developing and implementing measures to address and mitigate Human Rights risks and prevent or remedy adverse impacts.
4. **MONITOR:** Regularly monitoring and reviewing the effectiveness of the Cemex Group's Human Rights program processes, measures, and actions.
5. **COMMUNICATE:** Disclosing information regarding Human Rights to comply with legal requirements and raising awareness of our Human Rights program and HRDD approach among Employees, Business Units and other Stakeholders.

Our HRDD is complemented by continuous Stakeholder engagement and grievance mechanisms accessible for rightsholders to voice their concerns, complaints, and suggestions to the Cemex Group, as described further below.



OUR SALIENT HUMAN RIGHTS ISSUES

The Cemex Group's Salient Human Rights Issues are those Human Rights most at risk of severe negative impact due to the Cemex Group's activities or business relationships. The Cemex Group is committed to identifying these Salient Human Rights Issues.

To do so, the Cemex Group seeks to focus on the most severe potential negative impacts on Human Rights. To establish which Human Rights have the most severe impact, the Cemex Group can consider,

among other elements: (i) the gravity of the impact on the human right (scale), (ii) the number of individuals that are or could be affected (scope); and (iii) the ease with which those impacted could be restored to their prior enjoyment of the right (remediability).

EVALUATION OF THE CEMEX GROUP

At the Cemex Group, we are dedicated to identifying, assessing, mitigating, remediating, and monitoring Human Rights risks and adverse impacts resulting from our business activities, operations, and relationships. To achieve this, we have established several processes to evaluate the compliance of Cemex Group's Business Units with international human rights standards, which include the following:



- ✓ **HUMAN RIGHTS SELF-ASSESSMENTS (HRSAs):** We aim to carry out self-assessments covering Human Rights matters based on country risk-ratings, in countries where we substantially operate. These assessments seek to identify, map, and evaluate the Human Rights risks and opportunities in each country.
- ✓ **HUMAN RIGHTS RISK ASSESSMENTS (HRRAs):** We may conduct additional risk assessments on Business Units that are assessed as medium risk or higher, based on the results of the HRSAs. These assessments are aligned with our Enterprise Risk Management guidelines and seek to further examine the findings derived from the HRSAs.
- ✓ **HUMAN RIGHTS RISK PLANS (HRRPs) AND HUMAN RIGHTS IMPACT PLANS (HRIPs):** We may design and implement action plans to address and mitigate Human Rights risks and adverse impacts identified through the HRRAs. These plans may be supported by Business Unit Leaders to procure effective implementation and context-specific solutions.
- ✓ **GLOBAL RISK AGENDA:** We periodically identify, assess, monitor and review material risks and opportunities at global, regional, and local levels that could impact the Cemex Group's strategic objectives and business continuity through our Global Risk Agenda. The Cemex Corporate Enterprise Risk Management Department presents these material risks and opportunities in our internal Global Risk Agenda, including those related to Human Rights to Cemex's Executive Committee at least twice a year, and to the Corporate Practices and Finance Committee and the

Sustainability, Climate Action, Social Impact, and Diversity Committee of the Cemex Board of Directors at least once a year.



STAKEHOLDER ENGAGEMENT

We seek to actively engage with Stakeholders in discussions regarding the risks and potential adverse impacts that our business operations, activities, and relationships may cause them. We strive to establish processes that improve our engagement with Stakeholders by leveraging best practices and international standards. The Cemex Group may issue additional guidelines on our engagement with Stakeholders to support these efforts.



EVALUATION OF OUR THIRD PARTIES

At the Cemex Group, we are committed to upholding the respect for Human Rights across our supply chain and business relationships. To achieve this, we have established several processes to evaluate Third Parties, including our third-party due diligence process, supplier sustainability assessments, and contractor health and safety verification programs, among others. As part of these evaluations, we request information from Third Parties on various matters, including Human Rights. Using external evaluation services and internal methodologies, as well as various systems and platforms, we assess these Third Parties and analyze this information. Based on our assessment, we may provide training, request additional information, or and/or negotiate particular contractual terms with these Third Parties. We aim to continually enhance our processes to evaluate Third Parties to eventually cover all Third Parties.

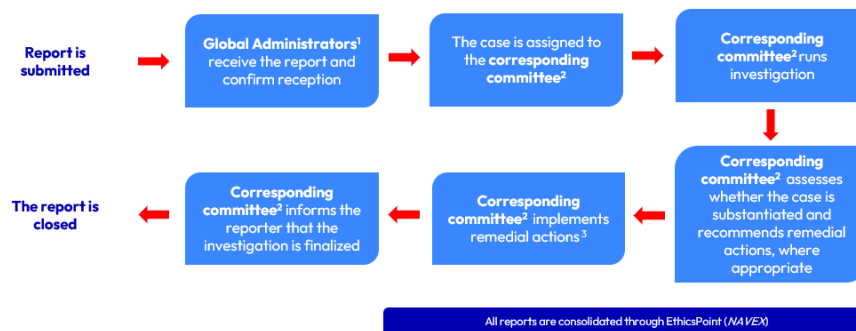


GRIEVANCE MECHANISMS

The ETHOS Group oversees and manages the Cemex Group's Global Compliance Program and has established various channels to receive grievances from Employees, Stakeholders and affected rightsholders to address concerns and misconduct, including those pertaining to Human Rights, within our business operations, activities, and relationships.

ETHOSline serves as our institutional platform for receiving grievances; however, this system may be updated or replaced as required. ETHOSline is a secure, confidential, and independent platform always available to both Employees and the general public to report any allegations of misconduct anonymously or confidentially. Authorized Cemex Group departments also serve as channels for receiving grievances from any source. These departments include the Cemex Internal Audit Department, any Cemex Local ETHOS Committees, the corresponding Cemex Regional Legal Department or Cemex Local Legal Department, and/or the Cemex Corporate Legal Compliance Department.

Furthermore, we have a process to provide individual follow-up to whistleblowers after the submission and resolution of cases to confirm that no retaliation has occurred. For Employees, we assess changes in their employment status after reporting.



1. Global Administrator, VP OHR, VP Process Assessment and Dir HR Planning and Development
2. Regional, Local or Corporate Committee, determined by the case dissemination protocol
3. The corresponding committee may request the support of the Global Social Impact Department on Human Rights-related reports.

Moreover, we have a community engagement process that allows Local Communities to raise their environmental and social concerns related to the Cemex Group's activities and operations. These grievances are documented and addressed through the Cemex Group's Social and Environmental Incidents Platform, which manages internally reported social and environmental incidents resulting from our operations and activities.



COMMUNICATION

At the Cemex Group, we endeavor to keep internal and external stakeholders informed by complying with applicable disclosure obligations and/or requirements. In our internal communications, we seek to keep employees informed and trained on our internal policies, guidelines, and processes related to Human Rights. We provide regular updates to Senior Management, governing bodies, committees, and relevant Cemex Group departments in respect of our assessment of Human Rights risks and adverse impacts in our operations and supply chains, as well as related action plans. Additionally, material updates on these assessments and action plans are presented to the Board of Directors and the corresponding committee(s) of the Board of Directors at least once a year. In our external communications, we present information related to our Human Rights program, as required by applicable laws, regulations and/or authorities, taking into consideration the initiatives and strategies described in this policy. Additionally, our Policy is publicly available on the Cemex Group's website.

3.3. AMENDMENTS

The Board of Directors delegates the authority to amend and update this Policy to the Cemex Senior Vice President of Legal (or any person with the equivalent title), only when such amendment or update is required to clarify any interpretations of this Policy, implement changes to the content of any annex, reflect changes in the process and methodology to comply with this Policy, and to incorporate any updates required by changes in applicable laws or regulations, provided that any such amendment or update is not contrary to the current terms of this Policy.

3.4. NON-COMPLIANCE PROCESS AND REPORTING

Strict compliance with this Policy is expected and required from all the Cemex Group, including its Employees and Business Units, as well as from its Third Parties. Any violation of this Policy may result in disciplinary action including, but not limited to, employment suspension or termination, as well as any other sanctions set forth and applicable pursuant to applicable laws.

The Cemex Group encourages reporting, in good faith, of any violation of this Policy or of any applicable laws. The official channels for reporting any actual or suspected breaches to this Policy are the following:

- ETHOSline, [via online](#) phone, or e-mail;
- Cemex Internal Audit Department;
- Any Cemex Local ETHOS Committee, via phone, e-mail or in person;
- The corresponding Cemex Regional Legal Department or Cemex Local Legal Department; or
- Cemex Corporate Legal Compliance Department.

3.5. NON-RETALIATION

As established in the Cemex Group's Non-discrimination, Non-harassment, Non-bullying and Non-retaliation Policy, the Cemex Group strictly prohibits retaliation against any individual who reports in good faith any possible non-compliance with this Policy. Such retaliation would be grounds for disciplinary action, including potential termination of employment. No Employee shall be terminated, demoted, suspended, harassed, or discriminated against solely because they reported in good faith an actual or suspected violation of this Policy or General Framework.

3.6. TRAININGS AND AUDITS

Employees and Third Parties may be required to attend necessary training if requested by the Cemex Global Social Impact Department, the Cemex Corporate Legal Compliance Department, the corresponding Cemex Regional Social Impact Department, Cemex Local Social Impact Department, Cemex Regional Legal Department, or Cemex Local Legal Department. Employees and Third Parties that receive training on this Policy can be asked to provide written confirmation that they have received the corresponding training. The Employees and Third Parties that require any training shall be identified by the Cemex Corporate Legal Compliance Department, or the corresponding Cemex Regional Legal Department or Cemex Local Legal Department, at their discretion.

Additionally, the Cemex Group has the authority to conduct audits, either directly or with the support of third-party consultants, to evaluate the compliance of Business Units, Employees, and Third Parties with this Policy.