

CEMEX STAKEHOLDER ENGAGEMENT POLICY

Global Policy effective as of March 25, 2025, that amends and replaces the prior policy dated May 2016.

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1. PURPOSE

The Cemex Group believes that long-term success is achieved responsibly and sustainably through strong stakeholder engagement in its enterprise. The Cemex Group's Stakeholders are defined as those groups and entities whose opinions and decisions have an influence on and who are affected by its activities. This Policy outlines the Cemex Group's commitment to create and share value by engaging in long-term relationships with its Stakeholders through dialogue in a transparent, meaningful, and ethical manner.

Every Business Unit and Employee at the Cemex Group is responsible for upholding proper stakeholder engagement under the scope of this Policy.

2. SCOPE

This Policy applies to all Cemex Group Employees and Business Units, and it encompasses interactions with the following various groups and persons that directly or indirectly engage with Cemex (the "Stakeholders"), which include, but are not limited to:

- Workforce;
- Customers;
- Investors;
- Suppliers;
- Communities; and
- Civil Society

This Policy is approved by the Chief Communications Officer and Executive Vice President of Investor Relations, Corporate Communications, and Public Affairs (CCO), and does not require approval from Cemex's Board of Directors. Additionally, this Policy replaces the Stakeholder Engagement Policy dated May 2016.

3. GOVERNANCE

The Cemex Corporate Public Affairs Department and CCO are responsible for managing and implementing this Policy, and may request any necessary support from other areas of the Cemex Group to implement and oversee this Policy. Understanding that different Stakeholders may involve specialized topics and may require different approaches, the Cemex Corporate Public Affairs Department and CCO may call upon one or several other organizations within Cemex Group to effectively implement this Policy.

The Cemex Corporate Public Affairs Department conducts a stakeholder analysis at least annually to identify and understand the various individuals or groups that have an interest in a project, initiative, or decision, allowing the Cemex Group to anticipate needs, concerns, and potential influence.

The Cemex Corporate Public Affairs Department and CCO shall regularly update the Sustainability, Climate Action, Social Impact, and Diversity Committee of Cemex's Board of Directors or any other appropriate committees of Cemex's Board of Directors on relevant stakeholder dialogues and issues that arise in the implementation of this Policy.

The Cemex Corporate Public Affairs Department has the ultimate responsibility for the interpretation of this Policy and has the right to implement any tools they deem necessary to assist in compliance with this Policy.

When in doubt as to the content or application of this Policy, all persons subject to the scope of this Policy have an obligation to contact the Cemex Corporate Public Affairs Department for guidance.

4. PRINCIPLES

At Cemex, engaging our Stakeholders is an integral part of the way we conduct business to ensure we foster strong and ongoing relationships that are supportive of our license to operate over the long term.

Cemex is committed to the following principles in its stakeholder engagement efforts:

- **Responsibility:** act responsibly and build relationships based on honesty, respect, and integrity.
- **Transparency:** seeking transparency in relationships, sharing accurate and timely information regarding the Cemex Group's activities, policies, and performance, subject to applicable confidentiality and privacy requirements.
- **Active listening:** encourage bi-directional and effective communication, listening to Stakeholder concerns and expectations respectfully and professionally to carefully evaluate such areas for possible future actions, while also providing another active mechanism for communicating grievances, complaints, or possible conflicts.
- **Collaboration:** strive to build mutually beneficial relationships as we identify and mitigate potential risks and ultimately promote a positive environment.
- **Continuous improvement:** seek continuous improvement regularly to ensure engagement mechanisms are effective and efficient.

The Cemex Group will establish communication channels to promote these principles and involve its Stakeholders in its activities, as well as strengthen their engagement with the Cemex Group. These channels may be general, such as the corporate website, social media, digital media, and other applications or interactions.

5. STAKEHOLDER ENGAGEMENT PROCESS

The Cemex Group recognizes that its activities have an impact on many internal and external Stakeholders, and seeks to identify, review, and prioritize a variety of stakeholder groups that are significant to its business environment. The Cemex Corporate Public Affairs Department and CCO will implement an engagement process that includes:

- **Prioritization:** identify, prioritize, and map Stakeholders taking into consideration the potential impact on our business, their interests, and their willingness to engage with our company.

- **Feedback and action:** analyze Stakeholders' interests and expectations through active research and consultation and provide input into the engagement plan that seeks to address both the company and its Stakeholders' positions and objectives. For each agenda objective and Stakeholder, establish an engagement plan that includes a measurable performance target, specific actions, a timeframe, and a designated Employee for responsibility.
- **Continuous dialogue:** monitor, review, and assess our engagement performance against targets and industry best practices to drive continuous improvement and openly report the results achieved. Update the business agenda, priority Stakeholders, and engagement plans on an annual basis with input from engagement results and Stakeholder feedback.
- **Continuous improvement:** the Corporate Public Affairs Department and CCO will periodically evaluate the effectiveness of this Policy and implement such improvements as are necessary or desirable to maximize the creation and sharing of value in the long-term relationships between Stakeholders and the Cemex Group. This evaluation will also ensure the Cemex Group's stakeholder engagement practices comply with applicable policies, procedures, applicable laws and regulations.

The Cemex Group identifies and selects Stakeholders based on various criteria which include, but are not limited to:

- Management determination;
- Possible or actual mutual impacts;
- Prior history of engagement;
- Stakeholder credibility and ability to work collaboratively to deliver objectives and outcomes; and
- Recommendations from other Stakeholders.

6. STAKEHOLDER ENGAGEMENT PLANS

The Cemex Group strives for all operating sites to maintain a Stakeholder Engagement Plan. As Stakeholder Engagement occurs at the operating site level, each site manager is required to establish a plan through which stakeholder engagement may occur.

Typically, a Stakeholder Engagement Plan includes:

- Identifying, mapping, and prioritizing Stakeholders;
- Analyzing Stakeholders' interests and expectations through internal and external consultation; and
- Defining the Stakeholder Engagement Plan.

Identifying, mapping, and prioritizing Stakeholders

To manage Stakeholders effectively, all individuals, groups, or organizations who may be affected by or have an impact on the operating site or company should be identified. Both internal and external Stakeholders should be considered, and then each stakeholder group should be evaluated to determine their level of interest and their potential influence. Following this evaluation, each stakeholder group should be mapped using different tools which are provided in Cemex's stakeholder engagement toolkit. When prioritizing Stakeholders, factors such as importance, urgency, potential impact, and risk should be considered.

Analyzing Stakeholders' interests and expectations

After identifying, mapping, and prioritizing Stakeholders, an assessment of site-specific engagement activities should be conducted. The evaluation should include socio-economic factors, needs or impact assessments, interviews, or other methods as deemed appropriate to determine the level of engagement required, identify common themes, potential conflicts, and areas for improvement. These efforts should strive for open and honest communication to build trust and address concerns proactively, and may involve independent, third-party consultation.

Defining the Stakeholder Engagement Plan

Using the results from the stakeholder identification, mapping, and prioritization, followed by the interest and expectations analysis as guides, the site can focus on developing and implementing a Stakeholder Engagement Plan.

The Stakeholder Engagement Plan should include:

- Defining engagement objectives;
- Making the objectives specific, measurable, achievable, relevant, and time-bound;
- Planning engagement methods and activities; and
- Monitoring and evaluating engagement efforts.

The Stakeholder Engagement Plan should be reviewed at least annually to evaluate whether the elements of the plan remain relevant and appropriate to the nature and scale of the operating site and issues. The full process of establishing a Stakeholder Engagement Plan should be repeated every three years, or as deemed appropriate by the site manager.

Stakeholder Engagement Plans are submitted annually to the Corporate Social Impact team.

The following table identifies the key collaboration topics, engagement channels and frequency, and desired outcomes for each stakeholder group to promote continued engagement, dialogue, and collaboration:

Stakeholder	Workforce	Customers	Investors
Objective	Our employees are a key part of our competitive advantage and the reason for our success. We continually seek to provide them with opportunities for growth and development, as well as a safe, healthy, diverse, and inclusive work environment.	By understanding our customers' needs and challenges, we aim to place them at the center of everything we do and become their partner of choice.	We have a robust investor engagement strategy to foster a clear understanding of our company's performance, strategy, and risks.
Key Collaboration Topics	- Company priorities and challenges - Health and safety - Business ethics - Employee well-being, experience, and engagement - Diversity and inclusion - Training, development, and career path	- Customer experience and engagement - Industry needs and challenges - Quality products, services, and solutions - Sustainability management practices - Our products' sustainable attributes	- Company's financial performance - Return on capital employed - Pricing integrity and antitrust compliance - Business ethics and legal compliance - ESG disclosure and performance - Risks and opportunities
Engagement Channels and Frequency	- Leader email messages and videos - Ethics and compliance campaigns - Employee experience surveys - Global and local newsletters - HR teams and HR process platforms - Open dialogues and meetings with leaders, including town halls with CEO and Executive Committee Members - ETHOSline 24/7 reporting line	- Sales representatives' ongoing relationship management - Cemex Go digital platform 24/7 - Regular commercial events - Customer satisfaction surveys - Satisfaction surveys, service centers, and helplines - ETHOSline 24/7 reporting line	- Regular meetings, webcasts, and conference calls - Quarterly financial updates and guidance - Annual integrated and 20-F reports, and mandatory filings - Ongoing website updates and press releases - Cemex Day investor event - Company position papers
Outcomes	- Understanding of our employees' needs - Talent management strategy - Ethics case reports for investigation - Learning strategy - Positive health and safety culture in the workplace - Safety workplace environment - Diversity and Inclusion Policy, committees, and initiatives, including participation in external programs - Speaking-up culture - Engaged workforce - Human Rights Due Diligence Approach including our Human Rights Self Assessment	- Customer centricity strategy - A clear understanding of our customers' needs and concerns - Net promoter score (NPS) - Digitalized solutions	- Understanding of financial position, performance, business perspectives, and risks - Strengthening of Cemex's ESG practices and metrics - Enhancement of reporting quality and transparency

Stakeholder	Suppliers	Communities	Civil Society
Objective	We develop a strong relationship across our network of suppliers, aiming to ensure compliance with our Code of Ethics and Business Conduct and our Code of Conduct When Doing Business With Us.	Our regular, formal dialogues with our neighboring communities have proven key to building mutual trust. By understanding their expectations, we can review progress and work together toward achieving agreed plans.	We actively engage and cooperate with governments and policy makers; global, national, and regional business associations; NGOs; and academic institutions. This collaboration helps us to participate in industry regulations policy discussions, foster partnerships to promote our core businesses, align with entities sharing our vision of building a better future, and support scientific research to enhance the environmental, social, and economic impacts of our products.
Key Collaboration Topics	- Business ethics, legal compliance, and respect for human rights - Quality of products and services - Supply chain reliability and efficiency - Health and safety - Sustainability management practices	- Health and safety - Education and capability development - Community infrastructure programs and housing - Community employability skills and well-being - Respect for human rights - Local employment opportunities	- Health and safety - Business ethics, legal compliance, and respect for human rights - Environmental standards, climate change, and emissions - Energy costs, efficiency, and sourcing - Circular economy and waste materials - Sustainable cities and communities, community infrastructure programs, and housing - Sustainability principles and challenges - Our products' sustainable attributes - Best practice sharing across the industry - Sustainability performance and disclosure - Energy and climate change solutions - Natural resources conservation - Innovation and business development - Public policy and advocacy
Engagement Channels and Frequency	- Daily interactions - Ongoing training and capacity-building programs - Health and safety and sustainability verification platforms - Annual Smart Innovation process - ETHOSline 24/7 reporting line	- Ongoing dialogues with communities - Annual open house days at operating sites - Ongoing educational programs and training - Community infrastructure, volunteering, and social investment initiatives - Co-creation of inclusive business programs - Community engagement plans - ETHOSline 24/7 reporting line	- Company position papers - Ongoing public policy discussions, working groups, and research studies - Long-term partnerships - Working groups - Periodic plant visits, meetings - Events and conferences - Annual integrated and 20-F reports - Collaborative research portfolios, technical papers, and advisory services - Subject matter expert participation in company events - Best practices and methodologies playbooks - ETHOSline 24/7 reporting line
Outcomes	- Supplier sustainability assessment for critical suppliers - Promotion of local suppliers - Third-party due diligence process - Contractor health and safety verifications in accordance with our internal health and safety policies and controls	- Improvement to community infrastructure and well-being - Increased participation of women in the local economy - Reduced figures of not-in-employment-or-education youth - Economic growth in the community - Volunteering program	- Successful adaptations to new local, national, and regional regulations - Compliance with applicable laws - Creation of joint initiatives that require a multidisciplinary approach, such as ARISE - Coordinated initiatives, statements, whitepapers, and communications campaigns - Industry best practice sharing - Strengthened positioning of cement and concrete as sustainable building materials - Incremental quality and transparency in company reporting - Strategic partnerships built with business associations, NGOs, and top universities - Awareness of global industry trends - New talent attraction for company - Risk and opportunities assessment

7. 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.
- “Business Unit” means any area 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 CCO” means Cemex’s Executive Vice-President of Investor Relations, Corporate Communications and Public Affairs or any other person with an equivalent title who may, in the future exercise similar functions in relation to the matters contained herein.
- “Cemex Corporate Public Affairs Department” means Cemex’s Corporate Public Affairs Department that reports to the Cemex CCO or any other department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Group” means Cemex and its consolidated Affiliates.
- “Cemex Internal Audit Department” means the Cemex’s Corporate Internal Audit or Process Assessment Department or any other department which may in the future exercise similar functions in relation to the matters covered herein.
- “Cemex Senior Management” means the senior management of the Cemex Group as identified in Cemex’s annual reports filed with the U.S. Securities and Exchange Commission and/or the *Comisión Nacional Bancaria y de Valores* in Mexico.
- “Confidential Information” means information that Cemex expressly classifies as such in its databases, submissions, documents, contracts, or agreements employed or submitted in the course of its business and/or that regulates the relationship with its customers or other parties or when it is classified as such in terms of the applicable legal provisions, in any event related to Securities registration processes in any registry, market or Stock Exchange, public offers, acquisitions or sale of Cemex’s own shares, as well as that which Cemex would have qualified as confidential.

- “Employees” means the individuals who occupy a position in or are directly or indirectly employed by any company of the Cemex Group.
- “General Framework” means (i) the terms and conditions set forth in this Policy, (ii) applicable local laws and regulations to which each Employee is subject to, (iii) charter documents (i.e., by-laws, articles of incorporation, etc.) of the Cemex Group; and (iv) any applicable Cemex Group internal policies.
- “Policy” means this Insider Trading and Transactions with Cemex Securities Policy as may from time to time be changed, amended, restated and/or supplemented.

8. AMENDMENTS AND WAIVERS

This Policy can only be amended with the written approval of the CCO.

This Policy must be analyzed and reviewed at least every two years, or before in accordance with any applicable General Framework, to determine if any updates or amendments are necessary, with the ultimate decision being of CCO.

All waivers and exceptions to this Policy, the processes contained herein, and any rules and/or guidelines set forth in this document, must be expressly approved in writing by the CCO.

9. NON-COMPLIANCE PROCESS AND REPORTING

Strict compliance of this Policy is expected and required from all Employees and Business Units. An

The Cemex Group encourages reporting, in good faith, of any violation regarding this Policy. 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;
- Cemex Corporate Public Affairs Department; or
- The CCO.

10. TRAININGS AND AUDITS

If and when required by the Cemex Corporate Public Affairs Department, Employees could be required to attend necessary trainings. Employees that receive training on this Policy can be asked to provide written confirmation that they have received the

corresponding training. The Employees that require any training shall be identified by the Cemex Corporate Public Affairs Department or the CCO, at their discretion.

Additionally, the Cemex Corporate Public Affairs Department, through the Cemex Internal Audit Department and any other internal areas of the Cemex Group deemed necessary by the CCO, has the authority to carry out audits to evaluate Employees' and Business Unit's compliance with this Policy.