

Environmental Policy

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1. Purpose

The Board of Directors of Cementos Molins, S.A. has the power to approve the Environmental Policy.

The purpose of this policy is to establish general action principles to become an environmentally-friendly business in compliance in accordance with the applicable rules. This policy is also aimed at defining a strategy for dialogue with stakeholders.

2. Scope of application and communication of non-compliance with the Policy

2.1 Scope of application

This policy applies to all the Spanish companies of the Molins Group and to the international individually-controlled subsidiaries.

In subsidiaries where control is not direct or is shared, the Board of Directors of the subsidiary is responsible for ensuring that the internal Environmental Policy is aligned with the general guidelines of this policy, making the changes necessary to ensure their alignment.

2.2 Communication of non-compliance with the Policy

All employees of the Molins Group must comply with Corporate Governance Policies and communicate to the Ethics and Compliance Committee any breaches of the guidelines and procedures described in this document in the shortest possible time and through the channel established for this, i.e., the Group's complaints channel. The Management of the Molins Group will determine the regime of sanctions to apply proportionally to the seriousness of the act to the person directly responsible for the breach of the Corporate Governance Policies and to those who, having the duty to prevent the breach, have not acted diligently to prevent it. In addition a sanction will be applied in a proportionate manner to those who, knowing the existence of the breach, did not duly report it.

3. Responsibilities

The following are the roles and responsibilities of the Molins Group's Environmental Policy, as well as the Environmental Management System:

- The Board of Directors: is responsible for:
 - Approving the Molins Group's Environmental Policy.
 - Ensuring that those responsible for the Environmental Management System have the necessary resources for its development and maintenance, and ensuring an effective functioning and continuous improvement of the system.
- The Steering Committee: is responsible for reporting to the Board of Directors the subjects discussed by the Management Committee, also including the approved action plans regarding environment for approval prior to their implementation. It is also responsible for defining, implementing and maintaining an appropriate Environmental Policy for the Molins Group.

- The Management Committee: is responsible for:
 - Monitoring the actions performed by the Molins Group in the field of environmental management.
 - Supervising the environmental part of the sustainability reports prepared by those responsible for the environmental policies in the companies which are part of the Group.
 - Reporting to the Steering Committee on the most relevant matters discussed by the Management Committee as well as the environmental action plans developed.
 - Supervising, monitoring and controlling the appropriate development of the Group's Environmental Management System.
- The Strategy and Sustainability Department: is responsible for supervising compliance with this Policy and for its review and regular update. It is also responsible for:
 - Including the information regarding the Group's environmental actions into the Sustainability Annual Report.
 - Supervising compliance with this policy.
- The General Management of each Society: is responsible for designing, together with the Strategy and Sustainability Department, the Group's annual strategic plan on environmental management, and for implementing the action plans designed, and ensuring compliance with the internal environmental procedures. It is also responsible for evaluating compliance with the Environmental Management System in their respective companies.
- Those responsible for the environmental policies: are responsible for reporting to each of the Group's companies on the results obtained from the evaluation process regarding compliance with the Environmental Management System. They are also responsible for:
 - Implementing the appropriate procedures in order to fulfill the Group's objective in the environmental field.
 - Establishing the frequency of the compliance evaluation process.
 - Receiving the results reports from the internal environmental audits.
 - Regularly reporting the compliance status of legal and other compliance requirements relating to the Environmental Management System to the Management.
 - Keeping all the documents proving the results from the compliance evaluation.

4. General operating principles

The Molins Group has defined a series of general operating principles regarding environmental management in order to fulfill the objectives proposed in this field:

- To comply with the current legislation and the Group's internal regulations regarding environmental management in all the countries where the Group is active:

- To adopt control activities and measure to minimise the environmental impact of the Group's operations.
- Using resources in a responsible manner in order to maximise the Group's value creation.
- Establishing the necessary measures to respect the environment at all times.
- To identify and assess environmental risks in order to design and implement the control activities required to prevent them, and hence ensure the Group's competitiveness and profitability in the long term.
- To internally communicate the internal procedures in the field of environmental management to all the employees within the Group in order to raise awareness for them to act in line with the Group's objectives regarding the environment.

5. Commitments for action

The commitments for action defined by the Molins Group in order to prevent any risk situation in the field of environmental management are as follows:

- To have the appropriate environmental management resources according to the legislation in force.
- To ensure and guarantee that the environmental management systems work appropriately and are integrated into the Group's business internal procedures.
- To define in detail the roles and responsibilities of those involved in environmental matters.
- To design and implement the activities and control measures required to prevent any environmental risks.
- To use environmentally-friendly resources.
- To communicate the importance of the environmental management system implemented to everyone within the Company.
- To internally raise employees' awareness of the importance of following the Group's procedures and internal regulations as well as this Policy and the provisions established by the current legislation within the field.
- To promote continuous improvement in environmental management by providing the resources for this purpose.

6. Channels of dialogue with stakeholders

The Molins Group undertakes to keep the channels of dialogue with its stakeholders always open. In this sense, the Group uses different channels to interact with the different groups on environmental matters, such as the Sustainability Committee or the Group's Sustainability Report, conducted every year in accordance with the guidelines of the Global Reporting Initiative.

The Group also defines an emergency plan in the event of any unexpected situation. This plan is internally and externally communicated to the Group. The Group provides every member within the Company and also the external members with the appropriate training on emergency procedures.

7. Monitoring and Control

The Management Committee of the Molins Group meets periodically to discuss the issues regarding corporate social responsibility and sustainability of all the Group's companies. These meetings are intended to discuss the environmental matters of all the companies that are part of the Group, and to monitor the action plans which have been implemented.

In addition, the Group's companies regularly carry out internal environmental audits of the environmental management systems of any of its processes that have or may have any risk of environmental impact. The results obtained from the audits and the recommendations derived from them are then communicated to the General Management of the relevant company, which will be responsible for adopting any recommendations it deems necessary. Then the General Management will report on this to the General Committee.

8. Reference documents

This section includes the documents referenced in this policy, which are:

- Protocol 4.7 of the Crime Prevention and Detection Model on Environmental Risk Management (reference PR.4.7.2017.V1)
- General Policy on Corporate Social Responsibility and Sustainability (reference P.18.2017.V1).