

CEMEX POLSKA SP. Z O.O.**STATEMENT ON THE FULFILMENT OF PPWR REQUIREMENTS****concerning packaging used by CEMEX Polska Sp. z o.o.**

Document number	CEMEX/PPWR/OG/08/2026
Status	General statement on the implemented system for fulfilling PPWR requirements. This is not an EU declaration of conformity for a specific packaging type.
Entity	CEMEX Polska Sp. z o.o., ul. Krakowiakow 46, 02-255 Warsaw, Poland
Scope	Packaging and packaging systems used in CEMEX Polska's operations: cement, admixtures, construction chemicals, aggregates, logistics processes.
Place and date	Warsaw, 13 August 2026; version 1.0; review by 13 August 2027.

1. Subject matter and nature of the statement

CEMEX Polska Sp. z o.o. has implemented and maintains a system for fulfilling PPWR requirements. The system has three layers: organisational, technical and documentation. Its legal basis is Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (PPWR). The system covers packaging and packaging systems used in the Company's operations (to the extent the PPWR applies to them).

The Company identifies packaging and determines its legal and operational roles. It obtains and verifies supplier data. It maintains technical documentation. It keeps the EU declarations of conformity current. It controls traceability. It oversees material and design changes. Documentation is updated on an ongoing basis (following changes in the law and in source data).

This statement is general in nature. It serves B2B communication. It confirms that the PPWR compliance system at CEMEX Polska is operating. It does not replace an EU declaration of conformity. It does not replace the technical documentation applicable to a specific packaging type or packaging family.

2. Scope of packaging covered by the system

The system covers packaging used in the manufacture, packing, purchase, distribution, storage and logistics of the Company's products. The identified portfolio includes:

- paper and multi-material sacks, including valve paper/PE sacks for cement and construction chemicals;
- plastic sacks and big bags for bulk products (where the given packaging system provides for them);
- plastic jerrycans, mainly for admixtures;
- drums, including variants for product masses of approx. 200-280 kg;
- IBC containers together with their integral structural components, with capacity and net mass appropriate for admixtures;
- boxes and other cardboard components used in grouped or transport packaging;
- single-use and reusable wooden pallets;
- stretch film, protective film and hoods, layer pads, tapes, edge protectors, labels and other protective and logistics components of the packaging system.

Cemex Polska Sp. z o.o.

with its registered office in Warsaw, address: ul. Krakowiakow 46, 02-255 Warsaw,

tel. +48 (22) 57 14 100, fax +48 (22) 571 41 01

Registry court: District Court for the Capital City of Warsaw, 14th Commercial Division of the National Court Register, KRS 0000037375, REGON 012192639, NIP 9511496432,

BDO: 000000439, share capital PLN 314,268,600.00





Packaging is assigned to products, SKUs, plants, suppliers and packaging systems in CEMEX Polska's internal registers and tools. The scope is updated whenever the product, packaging, supplier, design, material, market or distribution model changes.

3. PPWR compliance model

The compliance system consists of the following elements:

- Packaging identification. Each packaging unit is described by function, type, material, packaging system, supplier, application and link to a product or SKU.
- Role determination. CEMEX Polska determines its legal role under the PPWR for every packaging unit and every flow. The legal role is separate from the operational role, the contractual role and the obligations of a producer (EPR). The reference point is the actual distribution model, the market and the way the packaging is made available.
- Supplier data and documentation. The Company obtains and verifies the documents relevant to a given packaging unit. These include specifications, technical data sheets, declarations and statements. They also include material data, data on mass and composition, and substance information. A separate group covers recyclability, recycled content, labelling and material changes.
- Conformity assessment and technical documentation. This applies to packaging for which CEMEX Polska is the manufacturer within the meaning of the PPWR. The Company then runs the conformity assessment procedure and maintains technical documentation in line with the PPWR and Annex VII (to the extent relevant for the given packaging type).
- EU declarations of conformity. Drawn up in accordance with Article 39 of the PPWR and the model set out in Annex VIII to the PPWR. They are issued once conformity has been demonstrated on the basis of the relevant data and evidence. Each declaration is linked to the identifier of the packaging type or packaging family and to the corresponding technical documentation.
- Substances in packaging. The Company verifies documentation against Article 5 of the PPWR. This covers heavy metals and, where applicable, PFAS and other substances subject to requirements or restrictions.
- Recyclability, minimisation and reuse. The assessment covers design for recycling and the minimisation of mass and volume. For reusable packaging, the rules on reuse and oversight of the rotation system apply in addition.
- Labelling and communication. The Company oversees requirements on packaging identification, identification data of the responsible economic operator, labelling and B2B communication. It takes into account the application dates of the individual PPWR obligations.
- Change management. A change of material, supplier, design, artwork, coating, closure, intended use, market or packing process triggers a documentation review. If the change may affect conformity, the packaging is reassessed.

4. Traceability and documentation retention period

The Company applies a traceability model. The model links a packaging unit or packaging system to a product or SKU. Then to the plant or place of use, the specification, the supplier and the supporting documentation. Where the given model requires it, a batch, delivery or production marking is added (or another identifier allowing the packaging configuration to be reconstructed). The sources are commercial, logistics, procurement, technical and production data and documents. These include IT systems and internal registers. They also include specifications,





supplier documents and production records, together with delivery notes, invoices, logistics labels and batch numbers (or other identifiers used in the given process).

The Company keeps technical documentation and EU declarations of conformity for the period set out in Article 15(3) of the PPWR. At least:

- 5 years from placing on the market (single-use packaging);
- 10 years from placing on the market (reusable packaging).

The period may be longer. This is determined by other legislation, internal procedures, quality requirements or evidentiary needs.

5. Oversight of suppliers and supporting documentation

The Company obtains and qualifies documentation from suppliers of packaging, materials and components. The assessment covers the documents required for the given packaging type and for the role of CEMEX Polska. Gaps are identified, recorded and followed up until closed. A missing document is not replaced by a presumption of conformity.

For packaging supplied as complete units or as components, the supplier's data forms part of the Company's audit trail. A separate case covers packaging that the Company designs, fills or places on the market under a model in which CEMEX Polska is the manufacturer within the meaning of the PPWR. Final responsibility for documentation is then discharged in accordance with the role assigned to that packaging.

6. Reusable packaging and reuse systems

This applies to reusable packaging, including pallets and IBCs operating in reuse systems. CEMEX Polska operates a record-keeping model or participates in one. The records cover use, returns, rotations, losses and withdrawals (and other events material to the system). Their scope matches the actual operating model. Numbering every individual unit is not necessary, provided that traceability and the system balance are secured in another controlled manner.

7. Statement of CEMEX Polska

This statement is based on the implemented procedures, the registers, the documentation gathered, the determination of roles and the verification activities carried out. CEMEX Polska Sp. z o.o. hereby declares that it:

- has implemented a system for managing packaging compliance with the PPWR to the extent relevant for its operations;
- identifies the packaging and packaging systems it uses and links them to products, SKUs, suppliers and source documentation;
- determines its roles under the PPWR separately from its operational and contractual roles and from the obligations of a producer (EPR);
- obtains and verifies the supplier documents needed to assess packaging conformity;
- maintains technical documentation and EU declarations of conformity for packaging in which it is the manufacturer within the meaning of the PPWR;
- operates a traceability model allowing the link between packaging, product, supplier and supporting documentation to be reconstructed;
- keeps technical documentation and EU declarations of conformity for the required period (5 years for single-use packaging, 10 years for reusable packaging);
- oversees changes that may affect packaging conformity and updates the documentation following a change of material, design, supplier, process, market or legislation;
- monitors legal and technical developments concerning the PPWR and adapts the compliance system to new delegated and implementing acts, standards, common specifications and official guidance.



Cemex Polska Sp. z o.o.

with its registered office in Warsaw, address: ul. Krakowiakow 46, 02-255 Warsaw,

tel. +48 (22) 57 14 100, fax +48 (22) 571 41 01

Registry court: District Court for the Capital City of Warsaw, 14th Commercial Division of the National Court Register, KRS 0000037375, REGON 012192639, NIP 9511496432,

BDO: 000000439, share capital PLN 314,268,600.00





8. Scope of application and updating of the statement

This statement confirms that the PPWR system at CEMEX Polska is operating as at the date of issue. It is not an external certificate. It is not an EU declaration of conformity within the meaning of Article 39 of the PPWR for a specific packaging type. It does not replace the technical documentation maintained for individual packaging families and types.

This statement describes the state of the compliance system as at the date of issue. It is not a warranty. It is not an assurance as to the qualities of the goods sold. It is not a standalone undertaking of the Company towards a recipient or a third party. This statement does not create a basis for claims beyond the liability arising from the contract binding the Company with the given counterparty and beyond mandatory provisions of law. The recipient assesses the conformity of its own products and packaging independently (as well as the obligations arising from its own role under the PPWR).

This statement does not confirm the fulfilment of packaging waste management obligations. These are the obligations under the Polish Act of 13 June 2013 on packaging and packaging waste management and under extended producer responsibility schemes (EPR). They are subject to separate records and documentation.

The system is maintained and updated on an ongoing basis. Filling gaps in supplier data. Updating specifications. Expanding the product portfolio. New legal requirements. All of this is routine compliance oversight. It does not mean the PPWR system has not been implemented. This statement bears a version number and a date of issue. Version 1.0 is subject to review within 12 months of issue. It remains valid until the earlier of two dates: 13 August 2027, or the date of a legal, organisational, material or process change that warrants an update. A newer version supersedes all earlier versions.

CEMEX Polska Sp. z o.o.

Authorised person (name, position, basis of authorisation):

Konrad Nowakowski, PPWR Authorised Representative (power of attorney).

Signature:

Place and date of signature:



Cemex Polska Sp. z o.o.

with its registered office in Warsaw, address: ul. Krakowiaków 46, 02-255 Warsaw,

tel. +48 (22) 57 14 100, fax +48 (22) 571 41 01

Registry court: District Court for the Capital City of Warsaw, 14th Commercial Division of the National Court Register, KRS 0000037375, REGON 012192639, NIP 9511496432,

BDO: 000000439, share capital PLN 314,268,600.00

