

Version of the form: 01 of 04/28/2011

TABLE OF CONTENTS

1.	Objective	.1
	Scope	
3.	CONTENT OF THE POLICY	.1
3	.1 General premises for following the policy	.2
3	.2 Content of the Policy	.3
	3.2.1 Responsibilities and Duties of IT Users	.3 .4
	3.2.2 Responsibilities and Duties of High and Mid-Level Management3.2.3 Responsibilities and Duties of the IT Area	.5
4	GLOSSARY	.7

ARGOS

INFORMATION TECHNOLOGY POLICY

Version of the form: 01 on 28/'4/2011

APPROVED BY

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VERSION

001

1. OBJECTIVE

Describes the purpose of the policy and its content.

In order to establish a framework for the actions at Cementos Argos and its affiliated companies, the Executive Committee has established the Information Technology (herein IT) Policy to ensure the growth of the business through the full utilization of the IT implemented, the development and implementation of solutions that permit and empower the deployment of the strategy, and the proper management of risks and resources. This Policy is framed within the models for IT governance, the business and corporate strategies, internal and external regulations, and the industry's best practices.

2. SCOPE

Defines the general framework for the application of the policy.

This policy targets all IT users and managers in all the regions where Cementos Argos and its affiliates (herein the Company) have operations. This includes employees, contractors, consultants, clients, government institutions, suppliers, and other persons with access to its IT resources. It applies to all hardware devices and software and the digital information contained in the devices of the IT platform that are owned by the Company or for which it has rights to their use.

3. CONTENT OF THE POLICY

Defines the conduct desired by the organization in order to orient and clarify the decision-making.



Version of the form: 01 on 28/'4/2011

3.1 General premises for following the policy

Work as a team with the user areas to make maximum use of IT.

The purpose is to ensure an optimum usage of the Company's IT. This implies applying IT in the best way at the best place. To do this, the IT Area works along with the areas it supports. It ensures harmonious and productive cooperation, clarifying the responsibilities each has for IT, oriented toward excellence in the delivery of services.

Make the best use of IT as a single organization, supporting the strategies of each business and of the corporation.

The IT Area serves each of the Company's businesses so that they can compete effectively in their markets. It serves the corporate level of the Company to help it ensure the control, unity of purpose and to capitalize on synergies between the businesses. It manages IT in a standardized manner in each one of the geographic areas in which it operates.

Ensure the adoption of IT in order to guarantee its benefits.

IT shall be used to achieve benefits. It is understood that IT changes the way of doing things; therefore the IT Area undertakes each implementation as an organizational change process, where the impacts on human, organizational, and technological aspects are managed explicitly.

Active risk management

The IT Area is aware of the importance of IT for the Company and that is why it makes an effort to ensure the continuity and security of the services it provides, in joint work with the areas it supports. It identifies the risks, communicates them in a timely manner, and develops strategies for managing them in accordance with the risks levels that the Company is willing to accept.

The Company is respectful of the norms applicable to information technology. It respects and protects intellectual property that it owns as well as that of others.

Develop long-term relationships with IT providers.

The IT Area manages the providers as an extension of its own capacity to respond to the needs of the Company. It develops complementary win-win relationships, rather than competitive relationships, with providers.

Proactively manage IT.

The IT Area is responsible for managing IT proactively in order to anticipate problems and opportunities with the goal of being ready if they occur. It continuously monitors internal and external environments to find out about events that could impact the Company from an IT point of view.



Version of the form: 01 on 28/'4/2011

Apply IT to innovate.

The IT Area attends to requests from the businesses and also proposes innovations. Innovations do not necessarily imply new technologies; they can also imply new ways of applying the existing technologies. The IT Area stays up-to-date on advances in the world of technology and in the industry to identify opportunities to create value to the businesses.

Effective use of resources

The Company is efficient in the use of its resources and their most favorable impact. The IT Area manages its personnel comprehensively. It gives the user economical and technical information that will let them make an objective evaluation of the IT they use.

Build a business architecture following the plans agreed on

The efforts of the IT Area are oriented toward materializing the business architecture, which provides a long-term view of the processes, information, systems, and technology needed by the Company. It uses the strategic plan to organize the activities that are needed to materialize that architecture.

3.2 Content of the Policy

The development of IT management in the Company is based on three components that together constitute the Information Technology Policy:

- 3.2.1 Responsibilities and Duties of IT Users
- 3.2.2 Responsibilities and Duties of High and Mid-Level Management
- 3.2.3 Responsibilities and Duties of the IT Area

3.2.1 Responsibilities and Duties of IT Users

IT users are those persons, inside or outside of the company, who use an IT product or service. Their responsibilities and duties are:

- To use only the IT resources for which there is a legal right and which have been approved by the Strategic Committee on Processes and Technology and/or the IT Area for the purpose of working in interests of the organization.
- To use the IT devices provided by the IT Area, following the instructions given.



Version of the form: 01 on 28/'4/2011

- To make use of IT resources for non-work-related purposes that result in better training or efficiency in fulfillment of the user's functions. This use must not interfere with the user's responsibilities and may be subject to control and monitoring of both the form and the content. This privlegde may be revoked or limited at any time unilaterally by the organization, and must not require any additional expense for the organization, except those resulting from the normal use of the IT resources.
- To apply the security and backup actions indicated by the IT Area for critical digital information assets or those determined by the Directors or the IT Area.
- To ensure and control the quality of the data entering to the information systems.
- To use IT resources without offending the integrity or productivity of persons based on content or the way they are used.
- To not duplicate IT resources for non-work-related use, such as software and programs, except in those cases in which it is explicitly permitted by the IT Area and supported by the contracts with the manufacturers.

3.2.2 Responsibilities and Duties of High and Mid-Level Management

High and Mid-level management include the members of the Executive Committee and levels 1 and 2 of the corporate organizational structure. Their responsibilities and duties include:

- To apply a clear business rationale to consider benefits, opportunities, costs, and risks in both the short and long term. Also, to request from the IT Area the resources or access required by the users under their responsibility.
- To assume direct responsibility for managing organizational changes resulting from the implementation of IT services with support from the IT Area.
- To define the controls and protective measures necessary to ensure the security and continuity of the IT devices to include the protection of information in accordance with the needs of the Company, legislation of each country, and other considerations.
- To assign the resources and personnel necessary to develop the approved IT initiatives in conformance with the plans.
- To make sure their decisions and those of the persons under their supervision are framed within the business architecture and the IT plans.
- To make sure third parties that need to connect their IT devices in order to meet the objective of their contractual relationship with the Company have complied with the policies and standards



Version of the form: 01 on 28/'4/2011

defined by the IT Area.

- To ensure and control the quality of the data the users under their responsibility are entering into the information systems.
- To acquire IT goods and services only through the IT Area (Note: information services such as market intelligence services and electronic magazines accessed via the Internet are not considered to be an IT service.)
- To put in motion initiatives with an IT component only through the IT Area and following the proper approval process before implementation.
- To not hire personnel or to assign personnel under their supervision to the development, maintenance, or technical support of IT services.

3.2.3 Responsibilities and Duties of the IT Area

- To issue the guidelines, business rules, norms, procedures, methodologies, and other administrative tools necessary for the application of this policy and to verify that all the users, the high and mid-level management of the Company, and the IT Area itself know and observe them.
- To promote the overall management of IT personnel and their proper development in the context of the current and future needs of the organization.
- To work towards IT decisions respectful of people, aligned with the organizational design, and sensitive to the Company's socio-cultural dynamic.
- To analyze IT decisions taking into consideration the benefits, opportunities, costs, and risks, in both the short and the long term.
- To support the identification of areas of synergy among the businesses, not only to save costs but also to increase its competitive differentiation.
- To continuously monitor the needs of the business and the potential of IT with the purpose of ensuring the technological innovation focused on business performance and projecting the IT capacity needed in the present and in the future.
- To implement changes to IT services through a formal organizational change process to make sure they are properly integrated into the organization in order to obtain the planned benefits.
- To proactively monitor the status and use of IT resources, in order to guarantee their efficient use, protect them properly, manage the capacity, ensure compliance with service levels, and assure



Version of the form: 01 on 28/'4/2011

proper management of the rights to use.

• To acquire or contact IT goods or services, governed by the internal and external regulations applicable, framed within the Information Technology Policy, the governance models, the business architecture, the physical technological architecture, and an explicit and documented outsourcing strategy.

Given that the information security is key to IT management, in order to maintain the confidentiality, availability, and integrity of the information, the responsibilities and duties of the IT Area on this subject are:

- To manage IT security in coordination with the Company and its stakeholders, understanding that a vulnerability in one part of the organization can generate vulnerabilities in other parts.
- To include IT security and continuity characteristics from the time IT service requirements are defined and throughout its life cycle, properly balancing the business' need for functionality with the risks incurred.
- To implement and manage mechanisms of access control to the IT resources in such a way that they may be used only by those who are authorized, only for the authorized purpose, and only at the authorized times.

Considering that Business Architecture integrates the business processes, the information, the applications, and the technology, the IT Area has the following responsibilities and duties:

- To develop, update, comply and enforce the compliance with the business architecture, the strategic plans, and the physical technological architecture (including the selection of specific providers and products).
- To define the processes for selecting and prioritizing projects, with the purpose of managing expectations in the business areas.

For the inclusion of IT services and changes to those services, the IT Area complies with the following aspects:

- To explicitly consider aspects related to the optimization of the use of IT services from their conception and throughout their life cycle.
- To include IT devices whose cost and modification time is appropriate so that those features will not be the reason that business processes are not changed in a timely manner. Also, evaluate together with the business areas, whether it is more appropriate to change the business process so that the solution can be adopted and changed more efficiently.
- To make sure the inclusion and changes in the IT services explicitly consider the impact on all areas of the Company and on the different stakeholders.



Version of the form: 01 on 28/'4/2011

4 GLOSSARY

Defines the concepts and terms most frequently used in the policy that are basic to its understanding and application.

- IT Area: area responsible for managing the Information Techonolgy.
- Business architecture: high-level, holistic representation of the organization that includes components for businesses, information technology solutions, information and technology and shows the relationships among them, the environment, and the principles that govern its design and evolution. It responds to both the strategy and the operating models. It is represented mainly through diagrams, charts, and tables.
- Physical Technological Architecture: group of technical decisions necessary to ensure the materialization of the business architecture. It includes decisions on specific standards and names of products and IT manufacturers that are formally accepted by the organization.
- IT Governance Models: framework for decision-making and allocation of responsibilities related to the use and management of the IT.
- IT resources: the digital information assets plus the IT devices necessary for storing, processing, and transporting those assets.
- IT Service: group of activities that seek to meet the users' IT needs.
- IT Device: container or processor of the digital information assets. It includes, among other things, personal computers, mobile devices, external memory cards, printers, software, database managers, storage devices, servers, and networking devices.
- Digital information asset: definable set of information contained in an IT device to which is attributed a value. Some examples could be: payroll data, operation reports, commercial offers, etc.