

IMAGINE WHAT
WE CAN BUILD TOGETHER



CORPORATE COMPETITION POLICY





At Cementos Argos S.A. and its subsidiaries (hereinafter, “Argos”) we respect the different cultures, laws, people, and institutions of all the countries in which we operate. For this reason, we have adopted this Corporate Competition Policy (hereinafter, the “Policy”) as a general guideline that evidences our commitment to free and fair economic competition, and our rejection of any practices or agreements that limit or restrict the normal market development.

This Policy is the basis of our relationship with our stakeholders (customers, suppliers, business partners, and authorities) and acts as a general action and decision-making framework to comply with antitrust regulations.

This Policy, jointly with our Corporate Code of Conduct and the Corporate Competition Policy Compliance Guidelines, establishes conduct guidelines that apply to all our operations and that all the company's employees, officers and Directors (Board members) must comply.

This Policy reaffirms Argos' commitment to act with honesty, integrity, professionalism and the highest standards of ethics towards all stakeholders.

Dear team,

A special greeting to all.

Ethics, integrity, and transparency are the fundamental and non-negotiable values that guide our actions and motivate us daily to achieve our commitment to the creation of social value and to the transformation of the lives of million of people.

At Argos, we are convinced that, regardless of the challenges we face, these values must always prevail over business needs because acting correctly is the reflection of our organizational culture rather than a policy!

Delivering extraordinary solutions to our customers and adding value to society are fundamental pillars in our company. I am completely confident that our extraordinary human talent embraces day by day these principles through the development of innovative and sustainable products and processes. That these pillars are exalted through autonomous, independent, and informed decision-making that, under no circumstances, limits the normal development of free competition in the markets where we operate.

Our unwavering commitment to compliance is always a priority that allows us to reach transparent agreements, make free and conscious decisions and respect good faith and commercial loyalty. This commitment has undoubtedly allowed us to be valued by our stakeholders and remain in the hearts of millions of people. For this reason, I invite you to read and internalize our Corporate Competition Policy, a framework that inspires us and gives us conduct guidelines so that, as corporate citizens, we continue acting transparently.

I am completely convinced that, with the determined support of each one of you, we will continue to move sustainably towards the future Argos that we all want to build. I am confident that we will continue acting consistently with our values and ethical principles regardless of our role or position, the functions we perform and the territory where we work.

Together, we will continue leading by our example of transparency and integrity!

Sincerely,

Juan Esteban Calle
Cementos Argos CEO



Scope

This Policy applies to all employees, officers and directors of Argos and its subsidiaries, who must comply at all times by what is set forth herein, regardless of the country in which they are based.



Principles of action

At Argos, we compete in a fair, active, free and equitable manner, refraining from engaging in any conduct that may represent an abuse of dominant position and we are oriented by the following principles:



GOOD COMMERCIAL FAITH:

We act in an honest manner in our commercial relations, generating trust to our stakeholders, and we refrain from any unfair practices that affect the markets in which we operate.



AUTONOMY:

Decisions regarding our products, prices and commercial strategies are made autonomously and independently, based on our commercial policies and corporate objectives, and under no circumstance will they be based on agreements with competitors¹ or distributors that may affect the market.



FREE COMPETITION:

We shall not prevent the free entrance, exit and participation of our clients and competitors in the markets in which we operate. Our products are offered under conditions of equality and we do not engage in discriminatory practices.



CONSUMER PROTECTION:

We seek to protect the health and safety of our clients and our behaviors are aimed at enabling them to make free and informed decisions.

¹ A competitor is understood to be any person who offers goods and services that are similar to those goods and services that are offered by Argos in the same market.



Prohibited Conduct:

Based on the above principles, we will not tolerate conduct that may improperly affect the market, and consequently we refrain from:

- Failing to produce, limiting production or affecting the availability of products¹ in the market in an unjustified manner.
- Refusing to supply products to clients or distributors without justification.
- Selling to one client in different conditions from those offered to other clients of similar characteristics, unless there are justifying reasons, such as sales volumes, costs of delivery or payment conditions.
- Conditioning the supply of products to our clients or instructing our distributors to abstain from using, acquiring or selling competitors' products.



- Conditioning supplies of product to the purchase of other products offered by Argos or to the acceptance of additional contractual obligations that are not related to products acquisition.
- Imposing product resale prices on distributors.
- Denying the provision of products to customers or discriminating against them as retaliation for their pricing policy.
- Systematically reducing prices below production costs, when the purpose of such reduction is to eliminate one or several competitors or to avoid their entry or expansion.
- Selling goods or services in one part of a determined territory at a different price from another, when the intention or effect



¹ Product is understood as any goods or service.

of this practice is to lessen or eliminate competition in this area of the country, and the price is not in line with the cost structure of the transaction.



- Sharing confidential commercial information with competitors related to determining factors for market decisions, such as sales prices, discounts, customer profit margins, pricing trends, purchase or sale terms and conditions, capacity, production, commercialization or distribution costs, sales territories, market share, methods or condition of customer or vendor segmentation, customer information, competitive strategies, new lines of product, production volumes, commercial policies, trade secrets, investment or expansion projects or any other type of commercial sensitive information (hereinafter Commercial Information). Market intelligence and analysis may be carried out by Argos by obtaining information from public sources



- Obstructing the competition authorities in their endeavors as well as hiding or deleting information or providing false or incomplete information.
- Using the Company's technological devices (computer, cell phone, etc.) for purposes contrary to this Policy or the applicable competition law.



- Making agreements with competitors to set, reduce, maintain or increase sales prices for any of the products offered to the market, or making agreements with the competition on aspects such as terms of sales to customers, commercial policies, customer discounts, among other selling or commercialization conditions. Considering that in some jurisdictions, agreements contrary to competition law do not necessarily have to be written. Likewise, the exchange of information with competitors, directly or indirectly through third parties, regarding price changes, and in general, any conduct that allows competitors to know our policies for determining prices is prohibited.



- Making agreements with competitors or distributors to divide up markets, either by territory, sales volumes, production quantities or product type, or to limit the development of a given product or technology.
- During auctions, tenders or bidding processes, jointly setting prices with other participants, or setting price margins of bids, or agreeing to abstain from participating in the process in order to influence the award.
- Performing acts or agreements to prevent or limit access for clients, distributors or competitors to markets, products, raw materials or sales

channels.



- Carrying out conducts that imply the abuse of the dominant position, in those markets where it exists. Dominant position is understood to be the economic power or the participation that a company has in a market that allows it to exercise conducts that hinder free competition, such as predatory prices, discriminatory treatment of customers, setting of resale prices to distribution customers, among others.
- Spreading incorrect or inaccurate information on the business, products or business establishments of competitors or other elements that may negatively affect the image of competitors or generate confusion.

- Internally disorganizing a competitor's company or inducing its employees, suppliers or clients to fail to fulfill their contractual obligations.
- Performing acts of imitation, exploitation of another's reputation or violation of industrial secrets.
- Diverting customers by using mechanisms that run against commercial good faith.
- Taking advantage of the good industrial, trade or professional reputation gained by another market participant.
- Failing to comply with applicable legislation in the jurisdiction in which Argos operates with the objective of obtaining better margins or production or commercialization costs.
- Performing mergers or business combinations with current or potential competitors, clients or suppliers without fulfilling legal requirements that apply to these transactions, including mergers, acquisition of companies, assets, shares or parts of equity interest. Such transactions must in all cases be discussed and approved by the legal team.





We must take into consideration that acts or agreements that are punishable according to competition laws may be inferred by the competition authorities from conducts or communications, which are not necessarily in writing. For that reason, we must not exchange information with competitors either directly or indirectly through third parties or use expressions or communications that can have an ambiguous, controvertible meaning or that can be constructed in a manner contrary to the sense of the communication. In any case, no communication, conduct, agreement, expression or writing can be contrary to the competition law or this Policy.



We must be extremely careful in handling Commercial Information (prices, margins, customers, commercial policies, production capacity, among others) and in our interactions with competitors and distributors, and such relations must be managed in compliance with the guidelines established in the ***Corporate Competition Policy Compliance Guidelines***.



Every employee is responsible for abiding by applicable competition regulations in the jurisdiction in which he or she works. In many cases, measures that ensure compliance with competition regulations in one country or region do not guarantee compliance with the regulations of another. Consequently, if you have any concerns related to market behavior and compliance with competition legislation, you must seek assistance from the corresponding legal team.



Consequences of non-compliance

Failure to comply with this Policy shall be deemed a violation of work contract, and may entail penalties, and possibly termination of employment. Additionally, it may imply administrative fines, payment of compensation, legal expenses or penalties imposed by the competition authorities, or even criminal charges in some jurisdictions. These sanctions can be for both the companies and the employees involved depending on the country.



Concerns and Report of improper acts

This policy does not anticipate all situations nor does it intend to answer all the questions that employees may have in the exercise of their daily work functions. Any questions we have must be resolved with the Legal Manager of the corresponding Region.

In any case, we are all obliged to comply with the law and this Policy regardless of whether or not we have received formal training in it.



In any case, before any doubt in an activity or action that we intend to perform that may eventually imply a conduct contrary to the Policy, we must mandatorily refrain from acting.

Failure to report this type of behavior is considered a breach of this Policy and may imply penalties.



Any act that runs against the provisions of this Policy and competition regulations must be reported to the legal team or through the Transparency Hotline in order to carry out the corresponding investigation and take the required measures and corrective actions, which may involve the submission of reports to authorities.

Additionally, based on the reported facts, the need to reinforce existing controls will be assessed. It is everyone's duty to cooperate with the collection of information that enables the internal investigations of any possible breaches of this Policy.



APPROVAL AND UPDATE

This policy may be updated upon exposure to new risks in the operations and business of the company, according to feedback received from Argos employees or directors, due to changes in applicable competition rules or to the identification of standards and good practices that contribute to the prevention of acts contrary to free competition.

In any case, at least every two years the need to update this Policy should be evaluated.



This Policy and its updates or changes must be approved by the Steering Committee and disclosed to employees

FILE VERSION	FILE NAME	UPDATE YEAR
V.1	Creation of Competition Policy	2012
V.2	Corporate Competition Policy update	2019
V.3	Corporate Competition Policy update	2021



ARGOS

A company of  **GRUPO ARGOS**