

ANTI-BRIBERY AND ANTI-CORRUPTION **POLICY**





In compliance of **Cementos Argos S.A.** and its subsidiary companies' commitment (hereinafter Argos) to promote integrity and transparency in our operations and strengthen an institutional culture of ethics, best governance and compliance, we have implemented the Anti-Bribery and Anti-Corruption Policy as a general framework for action and decision-making that contributes to preventing and having self-control of these risks in our operations and businesses.

This policy and the other measures adopted within the framework of the Global Governance and Compliance Program for the prevention, control, detection and mitigation of bribery and corruption risks allow us to safeguard our good reputation, minimize the risk of financial resources loss, avoid being fined or sanctioned, guarantee regulatory compliance and extol the principles of action adopted by Argos.



SCOPE

The Anti-Bribery and Anti-Corruption Policy is applicable to all Argos employees, administrators and directors and its subsidiary companies (hereinafter Argos). They must follow its provisions at all times, regardless of the country where they are located. Likewise, it is applicable to agents, contractors, suppliers, representatives or third parties acting on behalf of Argos.



ACTION GUIDELINES

In accordance to our integrity principle, which is established as a behavior pillar in our Code of Business Conduct, we have adopted the Anti-Bribery and Anti-Corruption Policy as a general guide for action and decision-making that contributes to avoiding the materialization in our businesses of any act that, directly or indirectly, may constitute bribery, corruption or be contrary to the applicable regulations of interaction of authorities or national or foreign public officials (hereinafter Authorities). By virtue of the foregoing, Argos expects the recipients of this policy to act at all times in accordance with the following guidelines:



RELATIONSHIP WITH AUTHORITIES

Interactions with Authorities on behalf of Argos are cordial and respectful. In the event that their decisions are contrary to the interests of the company, they will be questioned through the legal mechanisms defined by the applicable regulations in each country and will refrain from exerting any type of undue pressure.

Before coming to any agreements or contracts with Authorities, we will review the applicable regulations and request support from the company's legal teams in order to fully comply with all applicable requirements.

At Argos, we do not hire or offer jobs to Authority representatives who have recently had a relevant role in matters that directly affect the interests of the company. In any case, hiring employees or former Authority officials must be in compliance with the regime of disabilities, incompatibilities or impediments that is applicable.

¹ For purposes of this policy, the term Authorities shall be understood as any entity or officer acting in the name of any State, department or territorial entity and/or performing public functions. This concept shall include, among others, national, department or local governments, ministers or other members of the cabinet of governments, judges, legislators, armed force members, directors of state companies or controlled by the State, officers of agencies, offices, bodies or entities of the State or that develop public functions.



PROHIBITION OF BRIBERY AND FACILITATION PAYMENTS

We do not offer, promise, agree or grant, directly or through intermediaries, favors, payments, hospitality, or gifts (hereinafter Goods) to national or foreign Authorities, their families or third parties related to them, with the intention of influencing their actions, decisions, omissions, or functions of their official positions or to obtain undue advantages. Likewise, we will refrain from making any facilitation payment that is prohibited in the regulations of each jurisdiction. Facilitation payments are those that seek to secure, expedite or unduly influence administrative actions or discretionary routine procedures of any Authority.

Meals, symbolic or institutional gifts or hospitality to Authorities may be granted occasionally if their sole purpose is to strengthen relations with the company, provided that they are reasonable in terms of their value and frequency. This must be in accordance with applicable regulations and must not seek to affect decisions or actions of the Authorities. We never give cash or equivalent gifts or hospitality that could be construed as a way to unduly influence the objectivity of the Authorities.

We prohibit the use of employee's own funds, travel, food or entertainment expenses or any commission to employees or associates to circumvent the prohibition on bribery set forth in this policy. In addition, under no circumstances do we give bribes through third parties outside of Argos, such as external agents, consultants, partners, representatives, suppliers, grantees or other intermediaries acting on behalf of the company.



CONTRIBUTIONS TO CHARITIES

The contributions, donations or sponsorships that Argos makes to charities, foundations, associations, non-governmental organizations or non-profit institutions will always have a lawful purpose and will never serve to cover up acts of corruption or bribery.



² For purposes of this policy, the term Thing of Value shall be understood as: any tangible or intangible thing of value, widely defined, in any form, including without limitation: cash, cash equivalent (such as gift cards and discounts on products), loans, gifts, invitations, goods, services, jobs for relatives, travel, accommodations, entertainment, meals, expense reimbursement, favors, business or employment opportunities, compliance with the request to deliver something of value to a third party, contributions to charitable purposes or other non-profit organizations and promotional sponsorships.



CONTRIBUTIONS TO DEMOCRACY

Exceptionally, we may make contributions for financing electoral campaigns, political parties, or movements whose sole purpose is to promote democracy. These contributions will always comply with current legislation. They will be in accordance with the maximums established by the competent authority and will never have the purpose of obtaining undue advantages.



ACCOUNTING RECORDS

In the event that we do make any of the contributions permitted in this policy, their accounting records must be clear, correct, exact and reliable. We do not carry out conduct tending to hide, change or omit accounting records to hide improper activities. Likewise, we have appropriate monitoring and internal control systems for these records.

The methodological detail for the proper implementation and dissemination of the measures and principles of action mentioned above, are in the Global Governance and Compliance Program Manual, in the Code of Business Conduct and in the other guidelines and business rules established by Argos and whose purpose is to manage and have self-control of the bribery and corruption risks.



CONSEQUENCES OF BREACH

Failure to comply with the Anti-Bribery and Anti-Corruption Policy will constitute a violation of the employment or commercial contract with Argos and will entail the application of sanctions that may even involve the termination of the employment or commercial relationship.

Additionally, it may involve administrative or criminal sanctions imposed by the competent authorities.





QUESTIONS AND REPORTING WARNINGS AND IMPROPER ACTS



This policy does not anticipate all situations, nor does it attempt to answer all the questions that employees may have in the exercise of their duties on a day-to-day basis. In case you have any doubts, you must make a verbal or written query to the legal department or the Compliance Officer (oficialdeconduc@argos.com.co).

Actions contrary to the provisions of this Policy must be reported through our Transparency Line or any of the other internal channels provided for this purpose. This is in aims of carrying out the corresponding investigation and taking the necessary measures and corrective measures, which may involve reporting to authorities. Additionally, based on the reported facts, the need to reinforce the existing controls will be assessed. It is everyone's duty to cooperate in providing information that allows the internal investigations associated with possible breaches of this Policy to be carried out thoroughly.



ARGOS

A company of  **GRUPO ARGOS**