

IMAGINE WHAT
WE CAN BUILD TOGETHER



ANTI-BRIBERY AND ANTICORRUPTION **POLICY**





According to the commitment of **Cementos Argos S.A.** and its subordinate companies (hereinafter Argos) to promote integrity and transparency in our operations and strengthen an institutional culture of ethics, good governance and compliance, we have adopted in Argos the Anti-Bribery and Anticorruption Policy as a general framework of action and decision-making that contributes to the prevention and self-control of those risks in our operations and businesses.

This policy and the other measures adopted in the framework of the Global Governance and Compliance Program for the prevention, control, detection and mitigation of the bribery and corruption risks allow us to safeguard our good reputation, reduce the risk of loss of financial resources, avoid the imposition of fines or sanctions, ensure regulatory compliance and uphold the values and principles of action adopted by Argos.



SCOPE

The Anti-Bribery and Anticorruption Policy is applicable to all employees, managers and directors of Argos and its subordinated companies (hereinafter Argos), who must always follow the provisions therein, regardless of the country where they are. Similarly, it is applicable to the agents, contractors, vendors, representatives or third parties acting on behalf of Argos.



ACTION GUIDELINES

In development of the integrity principle established as a conduct pillar in our Code of Business Conduct, we have adopted the Anti-Bribery and Anticorruption Policy as a general guide of action and decision-making that contributes to avoiding the materialization in our businesses of any act that may directly or indirectly constitute a bribe, corruption or that is contrary to applicable regulations for the interaction with national or foreign authorities or officers (hereinafter Authorities)¹. In light of the foregoing, Argos expects that the recipients of this policy always act pursuant to the following guidelines:



RELATIONSHIP WITH AUTHORITIES

The interactions with Authorities on behalf of Argos are kind and respectful. In case their decisions are contrary to the interests of the company, they shall be questioned through the legal mechanisms defined by applicable regulations of each country and refraining from exercising any improper type of pressure.

Before executing agreements with Authorities, we review the applicable rules and request accompaniment from the legal teams of the company in order to fully comply with all applicable requirements.

In Argos, we do not hire or offer employment to representatives of Authorities having or that have recently had a relevant role in issues directly affecting the company's interests. In any case, the recruitment of employees or former officers of Authorities

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 FACILITATING PAYMENTS

We do not offer, promise, agree or grant, directly or through intermediaries, any favor, payment or gift (hereinafter Things of Value)² to national or foreign Authorities, their relatives or third parties related to them with the purpose of influencing their actions, decisions, omissions or functions of their official positions or obtaining improper advantages. Similarly, we refrain from making facilitating payments, except those allowed in each jurisdiction laws. Facilitating payments are understood as those aiming at ensuring or speeding up the administrative actions or discretionary routine processes of any Authority.

The meals, symbolic or institutional gifts or courtesies to Authorities may be occasionally granted if their sole purpose is to strengthen the relationships with the company, provided they are reasonable regarding their value and frequency and they follow the applicable regulations. We never give gifts in cash or equivalent or courtesies that might be construed as a way to improperly influence the objectivity of the Authorities.

We prohibit the use of own funds of the employees to avoid the prohibition of bribery established herein. In addition, under no circumstance do we grant bribes through third parties outside of Argos, such as external agents, consultants, partners, representatives, vendors or other intermediaries acting in the name of the company.



CONTRIBUTIONS TO CHARITABLE ORGANIZATIONS

The contributions, donations or sponsorships made by Argos to charitable organizations, foundations, associations, non-governmental organizations or non-profit institutions shall always have a legal purpose and they shall never serve to cover 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

We could exceptionally make contributions addressed to the financing of electoral campaigns, political parties or movements whose purpose is to promote democracy. These contributions shall always be adjusted to the legislation in force, they shall be in accordance with the maximum limits established by the competent authority and they shall never aim at obtaining improper advantages.



ACCOUNTING RECORDS

In case we make any of the contributions or courtesies allowed in this policy, the accounting record thereof must be clear, correct, accurate and reliable. We do not perform conducts intended to hinder, change or omit accounting records to hide improper activities. Likewise, we have adequate monitoring and internal control systems of these records.

The methodological detail for the adequate implementation and disclosure of measures and action principles mentioned above are detailed in the Manual of the Global Governance and Compliance Program, in the code of Business Conduct and in the other guidelines and business rules established by Argos aiming at the management and self-control of bribery and corruption risks.



CONSEQUENCES OF NON-COMPLIANCE

The non-compliance with the Anti-Bribery and Anticorruption Policy shall constitute a violation of the employment or commercial agreement with Argos and shall lead to the application of sanctions that may even imply the termination of the employment or commercial relationship. In addition, it may imply administrative or criminal penalties imposed by the competent authorities.





CONCERNS AND REPORT OF WARNINGS AND IMPROPER ACTS

If we have any concern relative to the enforcement of this policy, we make a verbal or written consultation with the Chief Compliance Officer (oficialdeconduc@argos.com.co).



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 provisions of this policy, we must refrain from acting until we have the concept of the Chief Compliance Officer.



In case of being aware of an incorrect act contrary to the provisions of this policy or the other guidelines adopted by the company for the management and self-control of bribery and corruption risks, we inform it as soon as possible through the Transparency Hotline (lintransparencia@argos.com.co).



ARGOS

A company of  **GRUPO ARGOS**