

RECOMMENDATIONS ON THE USE OF COMPANY INFORMATION

These recommendations are in line with the Corporate Competition Policy.

Remember that we are committed to free and fair competition in all the markets where we operate!



Do you know what SENSITIVE INFORMATION is and how it should be treated?

Sale prices, discounts... sales or profit margins by customers, the terms and conditions of purchase or sale per customers, production capacity, production costs, marketing strategy distribution, market share, segmentation methods, competitive strategies, among others, **are all considered sensitive information and require careful and proper handling.**

We ALWAYS keep sensitive company information under top confidentiality and security parameters. Furthermore, we **DO NOT** share sensitive information to other areas in the company, which, because of their roles, don't need to know about it.

We ALWAYS safeguard sensitive information in the technological tools set by the company, such as the CRM. We **DO NOT** transfer sensitive information to our emails or personal devices.

WE MUST BE CAREFUL WITH OUR CHOICE OF WORDS and assume that what we say or write can be known by any third party.



1

When you give your personal opinion, make it clear that you do not represent the company's will.



2

Assume that everything you write will be reviewed, whether the document is presented as confidential or private.



3

Avoid exaggeration, speculation, and ambiguous or misleading language.

PRECAUTIONS
For sending emails

We must clearly know who the recipients of the email are. To achieve this, it is important that you always ask yourself: is it essential to answer the email? Does this have to do with the recipients? Who should receive the information? Is it internal or external? Should they know the content of the email? Is it necessary to reply to everyone?

It is very relevant to include the "Subject" of the email in a precise and clear way or the title of the message.

Avoid using abbreviations or acronyms that can create ambiguities or colloquial expressions that may lead to confusion.



In the body of the email, we should ALWAYS use formal language.

- Provide a context in case it is necessary to specify the use and purpose of the information.
- Include instructions such as: do not forward, confidential, draft, document under structuring, information for internal or exclusive use of the company, if applicable, etc.
- Be careful when forwarding emails, as it could be shared with people who should not know of it. Likewise, with confidential information in the attachments or in the email chain.
- If you can substitute an email for a direct conversation, **do it!**
- Avoid using adjectives regarding events, behaviors, or people.
- Do not use casual, careless, ambiguous, exaggerated, or imprecise language, which, if read out of context, may suggest conduct that is not permitted by the company and that is contrary to the law.
- **Avoid the following expressions:** *price war, monopolize, dominate, conquer, or control the market, exclude from the market, eradicate, block competition, establish entry barriers, stabilize the market or the industry, follow the industry policy, among others. These are behaviors not tolerated by the company!*

When preparing documents
KEEP IN MIND...

In files involving third-party or competitor content, identify and disclose the public source from which you obtained the information, for example: Dane, Invias, Procompetencia, Informa Colombia, the Economic Development Bank of Puerto Rico, among others.

Here are some example notes you can use:



"The prices of gray cement for general use that are included in the xxx file of the xxx cement companies correspond to public prices of products offered by these companies. These are obtained by our sales representatives when visiting hardware stores."

"The production capacity data of the xxx cement companies were taken directly by Argos employees on the websites of these companies, specifically, from management reports published for the general public."

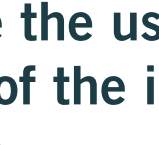
If you include graphs, data, results, or mathematical operations in a file, explain the implemented calculation method; it can be an explanatory note, such as:



"The estimated market share of Argos for 2021 was calculated based on the company's sales volumes for that same year divided by the total volume of industry shipments for 2021 published by DANE."

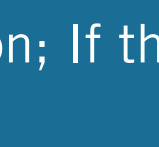
"The estimated participation of the competitors included here is calculated by..."

Clearly state the use and destination of the information, for example:



"The information contained in this file was prepared for the primary committee, which will be held on the xx of xx, 2022 as input to review the progress in the implementation of the marketing programs defined by Argos."

Use watermarks that say: Draft, Confidential, Internal Use Only, and Proprietary Information; If that's the case.



Determine the users and their scope: that is, the teams or people who will have access to the information and the permissions or restrictions for handling it; example: always save to SharePoint, select the option of not modifying or no local copies, etc.

