

ANTI-CORRUPTION POLICY

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At UNACEM S.A.A. we are committed to complying with the principles set out in our Code of Ethics and Conduct (CODEC) and with our bribery prevention system, which we are continually improving, as well as complying with anti-corruption legislation. We also require our associated companies and commercial partners to follow our lead in the fight against corruption.

We do not condone any corrupt act, we conduct our business with integrity and transparency and apply zero-tolerance to corruption.

Our collaborators will not be punished or subject to reprisals for reporting suspected deviations from this policy.

The following are not permitted in UNACEM S.A.A. and constitute acts of very serious misconduct:

- Influencing the decisions or objectivity of public officials or third parties in order to obtain benefit or advantage by the use of unethical and/or illegal practices.
- Accepting any direct or indirect attempt at bribery by third parties, even if by not doing so results in blackmail to the detriment of the company.
- Promising or offering, either directly or indirectly, any valuable object with the aim of obtaining undue advantage or speeding up administrative procedures.

- Making donations for reasons not exclusively altruistic, humanitarian or socially responsible.
- Accepting bribes.

We have strengthened our anti-corruption efforts by

- A rigorous selection process for our personnel and commercial partners, with special attention given to any indications of a lack of integrity, aimed at preventing links with individuals or companies who do not share our principles.
 - Making full and transparent financial information available to the markets.
 - Continual training for our collaborators on prevention and the fight against corruption.
- An Ethics and Conduct Committee with the authority and independence necessary to
- guarantee the prevention of corruption and to uphold the principles set out in our Code of Ethics and Conduct (CODEC).

This policy was approved by the board of directors of UNACEM S.A.A. on the 23rd of February 2018.