Title:



INTERCEMENT SUSTAINABILITY POLICY

1. OBJECTIVES

- To align the concept of sustainability within InterCement;
- To ensure alignment between sustainability measures and business goals;
- To meet the expectations of the Sustainability Charter, Camargo Corrêa Sustainability Group Guidelines and other InterCement external commitments;
- To ensure full performance of all legal requirements and, where necessary, to exceed these to
 ensure InterCement sole and reproducible sustainability standard, irrespective of the location of
 engagement.

2. DEFINITIONS AND ACRONYMS

Communities – Group of individuals with common interests who reside in the same locality and organize themselves on the basis of a set of standards.

Cement Sustainability Initiative – CSI. The Cement Sustainability Initiative that serves as an international forum for addressing sustainability issues in the cement industry. The initiative is a sector group of the World Business Council for Sustainable Development – WBCSD.

Sustainable Development – "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." (Our Common Future, Brundtland Commission Report, 1987).

Universal Human Rights – Means the fundamental rights and liberties of every human being, as set forth in the United Nations Universal Declaration of Human Rights.

Equity – Means fair and reasonable treatment, pursuant to law and the needs of each individual, on a case-by-case basis

Our Values – Means InterCement adheres to the Camargo Corrêa values cited in the Company Code of Conduct.

Stakeholders –Individual or group that affects or is affected by an organization's activities, plans, and/or projects, whether positively or negatively; stakeholders have specific interests, influence, or authority. They are also referred to as "target audiences" or "internal and external customers." In InterCement, stakeholders are grouped as follows: customers, collaborators, shareholders, investors, suppliers, sector companies, government and international organizations, third sector entities, professional associations, educational and research institutions, media, local communities, and society.

DESCRIPTION OF POLICY

We at InterCement are committed to sustainable development and recognize our responsibility for the impacts caused to the lives of people and societies with which we interact, and pledge to act in a proactive manner to monitor and mitigate the respective negative impacts.

Sustainability is an integral part of our strategic objectives and will always be considered at the strategic and tactical levels, constituting a component of the decision-making processes and daily activities of our employees and collaborators.

To meet these objectives, our initiatives are driven by **Our Values**, **Sustainability Guidelines**, and **internal policies**, **norms**, **and procedures**.

All of our activities will meet the applicable legal requirements and, where deemed necessary, those requirements will be exceeded.

3.1 Our values include:

- Respect for people and the environment;
- Responsible action;
- Transparency;
- A focus on outcomes;
- Quality and innovation.

3.2 Our sustainability guidelines:

Economic Dimension

- To be a preferred supplier, developing innovative solutions and lasting relationships founded on integrity, quality, cost-benefit, and reliable product and service deliveries;
- To identify suppliers aligned with InterCement sustainability values and principles and to adopt proactive measures within the business value chain;
- To promote an appropriate environment for continuous professional development, with a view to attracting and maintaining qualified professionals capable of adding value to our business;
- To forge relationships with investors founded on integrity, transparency and value generation;
- To maintain relationships founded on ethics and to proactively influence the formulation of public policies with an impact on sustainability.

Environmental Dimension

- To contribute to the conservation of environmental equilibrium and prevent and minimize through mitigation and offset measures, the impacts of our activities on the environment, while promoting awareness raising through the dissemination of knowledge;
- To continuously strive for technological evolution capable of reducing consumption and fostering the reuse and recycling of materials, water, and energy;
- To promote and ensure the adoption of environmental conservation practices by suppliers that are in line with InterCement underlying principles;
- To ensure that InterCement final products, services, and practices have the least effect possible on environmental equilibrium.

Social Dimension

- To promote dignified working conditions and management approaches that stimulate dialogue among employees and directors, enhancing the work environment;
- To offer employment opportunities and professional growth based on equity, fairness and respect for diversity;

- To value and promote respect for the principles of universal human rights, adopting proactive measures within the value chain;
- To establish relationships with communities founded on ethics and the respect for their values, with contributing to their economic and social development;
- To develop innovative products and services to achieve the ideal cost-benefit outcomes and fulfill the commitment to sustainability;
- To provide all the necessary information for the correct use of products and services, minimizing the risk of improper use.
 - 3.3 We maintain the following internal policies and norms:
- Camargo Corrêa Group Sustainability Charter;
- Camargo Corrêa Group Sustainability Standard;
- Camargo Corrêa Group Environmental Standard;
- Camargo Corrêa Group Health and Safety Standard;
- InterCement Company Code of Conduct;
- InterCement Corporate Health, Safety, and Environmental Policy;
- InterCement Corporate Risk Management Policy;
- InterCement Corporate Social Responsibility Standard;
- InterCement Management System Manual.
 - 3.4 We are guided by the following commitments:
- To maintain an ethical and transparent position in respect of our activities and relationships;
- To continuously strive for innovation in our processes, products, and services, with a view to
 optimizing the sustainable use of natural resources;
- To ensure consistency between our words and actions;
- To foster environmental awareness, raising and the adoption, by all collaborators, of environmental conservation practices which are in line with our standards in all localities in which we operate;
- To ensure our products, services, and practices have the least effect possible on environmental equilibrium;

- To act with social responsibility in partnership with the Camargo Corrêa Institute and Loma Negra
 Foundation, fostering community development and potential in the localities in which we engage;
- To generate value, jobs, and wealth for the communities in which we engage and in our value chain:
- To strive for the health and safety of our professionals, customers, suppliers, and the communities in which we engage;
- To work safely, or not at all;
- To offer dignified working conditions, ensuring the principles of universal human rights, for our professionals and across our value chain;
- To foster the personal and professional growth of our professionals, offering an environment that ensures equal opportunity and stimulates diversity and multiculturalism;
- To meet the expectations of our shareholders and investors;
- To disseminate our policy to the target audiences with which we interact through the promotion of sustainable practices.

Each of us is responsible for safeguarding the internal Values, Guidelines, Policies, and Norms and commitments set forth in this Policy.

4. RESPONSIBILITIES

- 4.1 The Executive Commission has the following responsibilities:
- To work to meet InterCement Sustainability Guidelines and commitments;
- To recommend and follow up the implementation of sustainability policies, strategies, processes, and measures that are in line with the internal policies and norms and commitments undertaken by the company;
- To identify and address risks and opportunities with a potentially significant impact on business activities, results, stakeholder relations, and InterCement image;
- To develop socio-environmental targets, goals and standards, tracking these through the respective sustainability performance indicators;
- To evaluate and approve investment and expenditure levels in connection with social or environmental measures in the context of current business activities or growth opportunities.

- 4.2 The Innovation and Sustainability Department has the following responsibilities:
- To monitor and report to the InterCement Executive Commission breaches in respect of fulfillment of the Sustainability Guidelines in respect of InterCement and the principles in this Policy;
- To prepare a Sustainability Action Plan for InterCement, secure its approval before the InterCement Executive Commission, and ensure its dissemination;
- To propose and approve within the InterCement Executive Commission and implement policies, strategies, procedures and initiatives related to sustainability;
- To identify and report to the Executive Commission risks and opportunities with a potentially significant impact on business activities, results, stakeholder relations, and InterCement image, in addition to recommending corrective solutions;
- To coordinate the regular collection of established sustainability performance indicators, evaluating the fulfillment of goals and reporting on these to eh Executive Commission;
- To coordinate with the Communications Office InterCement on sustainability information mobilization and dissemination efforts:
- To coordinate with the Human Resources Office on behavioral and technical capacity building in respect of the skills required to perform the corresponding sustainability measures;
- To coordinate with the Camargo Correa Institute, the Loma Negra Foundation, and Local Social Responsibility Committees the measures adopted in those communities in which we maintain operations;
- To propose the Sustainability Focal Points, considering the indication by Business Units Executive Board;
- To report to the InterCement Executive Commission on the investments or expenditures required to meet the pertinent objectives and commitments;
- To monitor the status of action plans and notify the Executive Commission of progress and deviations;
- To perform evaluations of the fulfillment of legal requirements and socio-environmental standard in ongoing projects and operations;
- To facilitate dissemination of the policy to the target audiences with which we interact, undertaking sustainability practices to this end.

- 4.3 The Business Unit Sustainability Focal Points have the following responsibilities:
- To report to InterCement Innovation and Sustainability Department on the investments and expenditures required to meet the Business Unit's sustainability strategy, secure their approval before the Executive Board of the Business Unit, and ensure their dissemination;
- To track the implementation of the social and environmental management measures provided for under in the Business Unit's sustainability strategy and report to the Unit's Executive Board, maintaining InterCement Innovation and Sustainability Department duly apprised of the progress achieved and obstacles encountered;
- To identify breaches in fulfilling sustainability policies, strategies, processes, and measures at the operational level;
- To identify and report to InterCement Innovation and Sustainability Department on the risks and opportunities with a potentially significant impact on business activities, results, stakeholder relations, and the Business Unit's image, in addition to recommending next steps;
- To contribute to the Communications Office's efforts to mobilize and disseminate sustainability information in connection with the Business Unit;
- To facilitate Corporate Social Responsibility governance in the Business Unit;
- To establish a system for the regular collection of sustainability performance indicators and report
 on these to the Unit's Executive Board and the Innovation and Sustainability Department, providing
 the necessary training to all personnel engaged in the respective operations for this purpose;
- To facilitate the dissemination of the policy to the target audiences with which we interact, adopting sustainability practices to this end.

5. RISKS

Fulfillment of InterCement Sustainability Policy will serve to minimize the following risks:

- Risks arising from social and environmental impacts;
- Risks in connection with non-fulfillment of internal and external socio-environmental commitments;
- Risk of financial or production losses by virtue of socio-environmental issues;
- Risks to the Company's reputation due to social, environmental, health, and safety issues.

6. DISPUTE SOLUTION

Any situation arising from the information in this Policy capable of generating internal and external disputes will be submitted to the InterCement Executive Committee, which will order adoption of the necessary corrective measures.