

CODE OF ETHICS AND CONDUCT

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MESSAGE FROM LOMA NEGRA'S CEO

At **Loma Negra**, we believe that the formula for success is to act together, with integrity and transparency.

To this end, we have an Integrity Program that reflects our strong and consistent commitment to maintaining an ethical culture and to mirroring our values and principles in all our daily activities.

We work in a **fair, ethical, transparent and responsible** manner from a social and environmental point of view and face the challenge complying with national and international standards.

The **purpose** of this **Code of Ethics and Conduct** is to provide the people who work at Loma Negra, regardless of their position, and the people who act on behalf, in the name or for the benefit of the company with clear and precise action guidelines.

I invite you to read this Code carefully and consider how you can actively contribute to continue building an ethical and transparent culture.

SERGIO DAMIAN FAIFMAN

PURPOSE, CULTURAL PRINCIPLES, MISSION AND VISION

Purpose

We transform people's lives by fostering sustainable growth.

Cultural Principles

We seal OUR COMMITMENT to help build a sustainable future, by adopting the best practices in the sector and the highest standards to create economic, environmental and social value.



Mission

To grow and develop together with customers, employees, suppliers, shareholders and communities towards innovation, sustainability and operational excellence.

Vision

To stand out in front of customers for our level of partnership and services, leading the cement industry markets.

OUR VALUES

To fulfill our purpose is essential that all our actions are aligned with the values that define our identity.

- **Respect for People and the Environment**

To always act correctly and fairly with its shareholders, employees, customers, suppliers, governments, communities and society in general.

To take actions for the benefit of the environment.

- **Transparency**

To provide clear and complete information systematically organized and accessible about activities, projects, policies and performance

- **Quality and innovation**

To guarantee customers the highest possible quality in the provision of services or products, and to constantly invest in the improvement of its activities and employees.

- **Responsible action**

To comply with the provisions of Argentine law; to respect the values defined herein; and to act with integrity and in accordance with the universal rules of good human coexistence, without discrimination based on ethnic origin, gender, creed, religion, position, function, or any other factor.

- **Focus on results**

To always seek to maximize performance in order to guarantee continuity, investments, return to shareholders and adequate conditions for employees.

SCOPE AND PURPOSE OF THE CODE

This **Code of Ethics and Conduct** (hereinafter, "Code") is applicable to the employees of **Loma Negra C.I.A.S.A.** and its subsidiary companies; Ferrosur Roca S.A., Recycomb S.A.U. and Fundación Loma Negra para el Desarrollo Sustentable (all of them hereinafter referred to as, "Company" and/or "**Loma Negra**").

It also applies to members of the board of directors, statutory auditors and all persons who work for the Company (hereinafter, "Employees") as well as to contractors, subcontractors, intermediaries, agents, suppliers, customers and, in general, to all those persons who provide services to **Loma Negra** or act on its behalf and/or name (hereinafter, "Third Parties").

The Code establishes the values and principles that define us and that must be present in all our daily tasks and in decision-making processes, avoiding inappropriate behavior that may impact, and/or damage the reputation of **Loma Negra**.

WE ACT WITH INTEGRITY

We conduct our business in compliance with the law and our goal is to always act in accordance with the values and principles that define us.

Zero tolerance to corruption, fraud and bribe

Transparency and ethics are the guarantee for achieving sustainable growth. Corruption is harmful and damaging. It has a negative impact on business and society in general.

Corruption can take many forms and includes the offer, delivery and/or receipt of something of value and/or any benefit to influence a decision or behavior in order to grant or receive an undue advantage. **Loma Negra** prohibits making payments to public officials to expedite or speed up an action or procedure, regardless of the amount.

All our interactions, especially those we maintain with public officials, must be always **professional and correct attitudes complying with the law, our values and principles**. The Company has a record of meetings of its employees with public officials.

Money laundering and terrorist financing practices are strictly prohibited.

We, the employees, must ensure that the Company only collaborates and does business with **respectable** Third Parties who engage in **lawful operations** and have **legitimate** resources.

We all have the responsibility and obligation to comply with our anti-corruption standards, the different laws and regulations on the subject, rejecting any corrupt act and immediately reporting it to the immediate manager, the Compliance area and/or the Compliance Officer.

Competition & Antitrust Practices

We respect our competitors and aim to outperform them in a legitimate manner. We do not accept behaviors that may constitute slander or defamation of competitors.

We share the principles of **free competition** and participate in business associations only to contribute to **promoting the development** of the economic sectors where we operate.

We are forbidden from performing any act aimed at favoring unfair and anti-competitive practices and this implies any agreement or agreed practice between competitors to fix prices, divide markets, establish mechanisms to restrict production, agree bids in public tenders or any other sensitive act that may be considered anti-competitive.

We understand that **loyalty in competition** and **respect for consumer rights** are factors that favor the development of the market on a sustainable basis. No customer can be forced to accept conditions that contravene these rules to acquire a product or service from the **Loma Negra** business units.

Conflict of Interest

It is essential to avoid situations in which personal interests, whether those of an Employee or a Third Party, conflict with the interests of the Company. Conflicts of Interest may be real, potential or apparent, depending on each case.

It is important to inform your immediate manager and the Compliance area of any situation that could constitute a conflict of interest, prior to carrying out the operation or conclusion of the pertinent business, in order to assess whether our **objective and impartial performance** may be compromised.

The hiring of family members is permitted, however, subordination relationships in the same sector or in different areas sharing control or supervision must be avoided. If this occurs, the Human Capital and the Compliance areas must be informed, and the Affidavit of Conflicts of Interest must be submitted. The responsible areas must decide on the selection and hiring of employees, pressure to influence the admission, promotion or resignation of the related employees is not admissible.

Likewise, Employees must inform their immediate manager and the person in charge of the area when any Third Party we have close relationship with is being qualified or contracted to provide services or products to **Loma Negra**.

Invitations to serve as Director, Statutory Auditor, in a company or entity that does not belong to the Company must be previously informed for evaluation by both the Compliance Officer and the Compliance area.

External professional activities

We must be fully dedicated to the functions we perform in the Company; therefore, such functions may not be compatible with the performance of other activities.

For this reason, Employees may not accept positions or functions in other companies or entities if that schedule affects their work day at **Loma Negra**. Exceptions may only be admitted in special cases previously approved by their immediate manager and the Human Capital area, who will record such exceptions.

They will only be approved when they do not represent conflicts of interest or harm their personal performance.

Invitations to serve as Director or Advisor, in a company or entity that does not belong to **Loma Negra** group must be previously informed for evaluation by the Ethics and Compliance Committee.

Performing any work or activity on behalf of **Loma Negra**, or using its name or facilities must have the prior approval of the Director of the area.

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Any work additional to the duties at **Loma Negra** must be carried out outside of working hours. If these activities could be construed as a Conflict of Interest or in case of doubt, the Human Capital area and the Compliance area must be immediately notified. If undertaking a new activity is under consideration, checking it out in advance is suggested.

Gifts and Hospitality

Sometimes the giving and accepting of gifts or other hospitality can influence decision-making or at least create the appearance of seeking to improperly influence them.

Gifts and hospitality may be offered or received provided that: **(i)** they are reasonable and in good faith; **(ii)** they comply with applicable rules and procedures, both internal and of the other party involved; **(iii)** they comply with current regulations both in the country and in the region; **(iv)** they have a business purpose. Gifts and hospitality should preferably be institutional, modest and of reasonable value.

Accepting, offering, providing or giving cash or its equivalent (for example, gift cards) is prohibited.

All gifts and hospitality offered, provided or given, directly or indirectly, by public officials must be rejected regardless of their value and must be reported to the Compliance area.

With regard to travel and representation expenses on behalf of **Loma Negra**, these must be related to the purposes of the business. It is not permitted to offer them to improperly influence or compensate an official act or decision, as real or intended compensation for any benefit of the Company.

Child and Slave Labor

Child and/or slave labor is prohibited. **Loma Negra** prohibits people, organizations or institutions with which we interact to adhere to the same principle.

The Company supports and carries out activities that help develop the children of the communities where it operates and, to the extent possible, offers internships and training and learning programs for young people.

Political Contributions

The financing of electoral campaigns and/or contributions to political parties in all their forms is strictly prohibited.

It is prohibited to use Company funds or resources directly or indirectly to help finance political parties, political campaigns, political candidates or associated persons.

WE ARE RESPECTFUL

Diversity

We value diversity and believe that it is one of the cornerstone for maintaining the Company's success through the time and growth.

At **Loma Negra** we are committed to ensuring that all people receive the **same opportunities** and the **same treatment** to reach their maximum professional potential.

We foster a **healthy workplace environment** that facilitates the development of Employees, valuing the wide diversity of capabilities and experiences, respecting all individual characteristics.

Non discrimination

The Company is committed to equal employment opportunities for all, regardless of ethnic origin, gender identity, religion, beliefs or nationality. Career progress depends exclusively on individual performance, talent, commitment to values, dedication and participation of each one.

Discriminatory practices against any Employee or candidate employee are not tolerated.

Workplace Violence

At **Loma Negra** we are committed to guaranteeing a **workplace environment free of violence** that respects the dignity of all Employees and Third Parties.

We do not tolerate intimidation, harassment or violence in any form.

If we experience or witness any of these behaviors, it must be reported, either by contacting the Human Capital area, the Compliance area and/or the Compliance Officer and/or by reporting the situation through the Ethics Line.

Harassment

Moral or sexual harassment by an Employee or Third Party is an unacceptable practice in a respectful and decent workplace environment.

The Company fosters a workplace environment free of harassment of any kind and/or other offensive or disrespectful conduct. Therefore, under no circumstances will harassment in any form be tolerated.

Harassment includes any inappropriate behavior, whether verbal, visual, physical or of any other kind, that creates an intimidating, hostile or offensive workplace environment. Such behavior may include, among others, the following practices: **(i)** sexual harassment; **(ii)** offensive language or jokes; **(iii)** inappropriate comments about ethnic origin, gender identity, sexual orientation or religion; **(iv)** degrading comments; **(v)** intimidating or threatening behavior; **(vi)** displays of hostility towards others as a result of their individual characteristics.

Drugs, Weapons or Alcohol

We are committed to health and safety in the workplace environment. The consumption of alcohol, drugs or the abuse of any other substance can negatively affect us.

Both Employees and Third Parties are prohibited from showing up to work and/or performing tasks under the influence of alcohol or any drug or psychoactive substance.

Consuming alcohol, illegal drugs or carrying weapons is not permitted in the workplace environment, and is considered a serious infraction, subject to labor and criminal sanctions.

Code compliance

All Employees and Third Parties have the obligation to:

- Ensure compliance with this Code and inform the immediate manager, the Compliance Officer, the Ethics Line, the Compliance area or the Human Capital area, when becoming aware of any violation of the rules.
- Adopt behaviors and attitudes that serve as an example of what is herein set forth.
- Disseminate the values and principles of Loma Negra among Employees and Third Parties.

Political-Party and Religious Activities

We respect the civic, religious and political activities of Employees and Third Parties, which must be carried out in free time and on a strictly personal basis.

Loma Negra does not participate in political activities. Those who want to take part in political activities must do so without involving the name or resources of the Company.

It is not permitted to request participation, support, financing or involvement of any political candidate or party. Political activities carried out must occur outside the workplace environment and the work day.

Labor Union Activities

We encourage a mutual respect relationship with labor union entities and we do not practice any type of discrimination towards people who are unionized, recognizing free labor union association.

Professional and Business Associations and Entities

At **Loma Negra** we participate in entities and associations that represent our sectors of activity, as long as this participation contributes to the development of the sector and does not imply violations of the rules and principles of free competition. The form of participation must be defined in each business unit taking into account the profile of local associations.

The active participation of Employees in social, cultural or charitable entities that have public recognition, made on an individual basis, is seen as an important contribution to society and the country, provided that it does not affect the daily work carried out in **Loma Negra** or compromise their participation.

WE ARE RESPONSIBLE FOR THE USE OF RESOURCES

Health and Safety

Health and safety conditions at work must be the subject of constant attention and we must ensure the lowest possible risk in the performance of our duties. To this end, prevention, education and awareness policies must be implemented.

We must comply with general preventive health and safety regulations and participate in training and orientation activities.

Information about Loma Negra and its Businesses

We have the obligation to maintain the confidentiality of the Company's information and must respect the provisions from the Policy on Disclosure of Confidential Information. Information about **Loma Negra** must be disclosed internally and externally only by those who are authorized to do so and in a precise, objective and appropriate manner.

Information that may influence the value, the behavior of the shares in the market and the decision to acquire or sell **Loma Negra's** shares is considered confidential.

We are responsible for safeguarding the information we have and we must report to the Compliance area and/or the Compliance Officer and/or through the Ethics Line any fact that may seem strange or incompatible with the values and principles of **Loma Negra**.

Making false, slanderous and/or malicious statements about Employees, the Company, its businesses, partners, suppliers or customers may be subject to labor or criminal sanctions.

If we have access to non-public information, we have the duty to keep it confidential, even after the employment or contractual relationship has ended.

The use of privileged information for personal benefit or that of third parties, even in the case of securities negotiations in the capital market, is a crime, subject to labor and criminal sanctions.

For more information, refer to **Policy on Disclosure of Confidential Information**

Communication Media

We are responsible for what we say. We must protect the information we provide to third parties about the Company, as this may impact its activity and reputation.

If we are asked to make statements, write articles or give interviews on behalf of **Loma Negra** to any communication media regardless of the type, the Disclosure Committee must be consulted beforehand.

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Only the Spokespersons and/or the persons who are specifically designated by the Disclosure Committee will be in charge of dealing with communication media.

Use of Social Networks

Social media platforms are channels that allow us to demonstrate the excellence of our businesses and products, as well as to strengthen our relationship with our customers.

When we publish information or opinions as members of the Company, we must act with respect, good judgment and common sense. Under no circumstances should we publish confidential information about **Loma Negra** and/or Employees and/or Third Parties, nor give opinions that can be attributed to **Loma Negra**.

When we publish information or opinions on our own behalf, we should not include references that allow the published content to be attributed to **Loma Negra**.

We must take care of our reputation, avoiding negatively affecting it through the improper use of social networks.

WE TAKE CARE OF THE COMPANY'S RESOURCES

Goods and Assets

We have the responsibility to use **Loma Negra's** goods and assets that are part of our work correctly and responsibly. Assets and goods are the equipment and systems provided by the Company, such as: telephone, computer, e-mail, internet, social networks, among others.

The use of assets and goods for purposes not directly related to work is prohibited, unless express authorization is granted. When permitted, personal use must be restricted to what is necessary.

The misappropriation or misuse of any of these assets, including their copying, sale or distribution, are serious violations, which may lead to labor or criminal sanctions.

Assets and goods cannot be used to transmit or receive aggressive, pornographic information, information about political, religious or other positions, nor to spread offensive messages that contradict the Company's values and principles reflected in this Code and that harm its image.

We, the employees of the Company, understand that the use of the assigned assets can be controlled and monitored in accordance with the provisions of current regulations.

Accounting Records

Accounting records must be prepared correctly, clearly, objectively and in accordance with current legislation. They must be true, accurate and complete. Under no circumstances may accounting records be made, in whole or in part, with the objective or effect of covering up any illegal activity. Accounting records must be supported by consistent documentation.

Patents and Innovations

Innovations developed by Employees and Third Parties through their work at or for **Loma Negra**, as well as the patents and property rights resulting from these inventions, must be kept confidential and are incorporated into the Company's assets, even after the employment or contractual relationship has ended.

Information Technology

We are required to comply with established computer security measures, protect network access passwords, and take care of electronic devices provided by the Company and their use at all times.

Working Papers and Documents

Working papers, reports, correspondence, and other documents used in our daily tasks are the property of the Company and may not be withdrawn or copied, even after the employment or contractual relationship has ended. Furthermore, such information must be kept in accordance with information security standards.

Donations and Sponsorships

Donations and sponsorships may only be received or offered in accordance with the laws and regulatory frameworks in force in the area and duly recorded in the accounting books.

No donation or sponsorship should be offered or received for illegal purposes, nor should it be interpreted in such a way.

Any donation or sponsorship that is intended to be made on behalf of the Company requires prior authorization.

WE RELATE TO THIRD PARTIES IN AN ETHICAL AND FAIR MANNER

Third Parties

The commercial relations we have with Third Parties must always have as a goal/objective the search for quality, an adequate cost-benefit relationship, technical and financial reliability, integrity when conducting the negotiation, with regard to legislation, the environment and commercial, social and contractual rights.

In order to expand our sustainable performance, we encourage our Third Parties to adopt an ethical, responsible performance in the social and environmental areas and the generation of sustainable partnerships.

We select our suppliers based on technical criteria, considering experience, excellence and cost, and we also evaluate their integrity.

Any interaction with the National, Provincial or Municipal State, or with public officials, related to products or contracts must especially involve an evaluation of the applicable laws and regulations to ensure that all the requirements of laws and regulations are met.

Corporate Governance

Loma Negra's purpose is to adopt the best corporate governance practices and to continually work in that direction. We are committed to strictly following the rules and regulations applicable to listed companies, providing shareholders and potential investors with the information necessary for investment decisions, as well as information on its performance and possible projects.

In accordance with the provisions of the Insider Trading Policy, the Company does not prohibit transactions with shares and/or any other of its securities, irrespective of the fact that said transactions will be on its own account and under its exclusive responsibility considering that the purchase and sale of shares and/or securities is subject to risks inherent to stock markets. Likewise, we must ensure strict compliance with the **confidentiality of relevant material information** not disclosed to the market.

Customers

At the Company we stand out for our high levels of quality in products and services, so we only provide products or services that comply with legislation and sector standards. In the event that any non-compliance is detected, explanatory or compensatory measures will be taken.

In addition to ensuring the quality of the products and services we offer, we are committed to always serving customers and consumers with efficiency, speed, education and transparency.

Interaction with the Public Sector

We work **respectfully and with integrity** with all public agencies and officials. When selling, buying, negotiating or working with the public sector, we must take special care to strictly comply with all applicable rules and regulations.

WE ARE COMMITTED TO SUSTAINABILITY

We consider sustainability the basis of our business vision, and the starting point of our activities and commitment to operating in a safe as well as as in a socially and environmentally responsible manner.

Three principles drive our practices in the markets in which we operate, under the triple impact concept promoting **economic growth, social contribution and care for the environment**, in harmony with our communities.

We continue to develop as a world-class company and operate our business in accordance with the principles of sustainability; we are agents of change within the framework of **continuous improvement**.

All of the Company's activities must be carried out in compliance with the law and environmental standards, also seeking to optimize the use of natural resources and to preserve nature and biodiversity. To this end, we encourage and implement integrated management systems, with certification of environmental quality, occupational health and safety.

At **Loma Negra** we cooperate with the communities where we operate in the development of environmental awareness and in preservation actions. We also ensure that both our Employees and the Third Parties involved adopt the same values and attitudes.

OUR COMMITMENT TO COMMUNITY

We carry out social responsibility and internal volunteering activities through **Fundación Loma Negra**.

We aim to live in harmony with the communities in which we operate through our business units, respecting people, their traditions, their values and the environment. At the same time, we actively collaborate in local development, in improving the quality of life and in reducing social problems and inequalities.

These activities must be structured and organized in order to obtain the maximum possible social return in relation to the resources used and the time of the people involved. The annual management reports include information on the results obtained.

ETHICS LINE

At Loma Negra we have an **Ethics Line, a confidential communication channel** managed by an independent third party through which we can dispel doubts, make inquiries or report any behaviour we suspect or are certain it is inappropriate or contrary to the Code and/or the Integrity Program of the Company. It allows us to communicate anonymously or not, and the confidentiality of the information provided is guaranteeing in all cases

Irrespective of our function or role, we have the duty and obligation to make ourselves heard when faced with behaviors or situations that are not aligned with **our principles and values**.

We do not tolerate any type of retaliation for reports or complaints that were made in good faith regarding improper conduct, questionable behavior or possible violations of this Code. We encourage open communication of all types of doubts and concerns, without fear of negative reactions or retaliation. Individuals who take action against another for raising a concern or participating in an investigation will be subject to disciplinary action, which may include termination of employment.

The Ethics Line channels for communicating are available 24 hours a day, 7 days a week, 365 days a year.

We can access the Ethics Line channels through our website <https://www.lomanegra.com/compliance/>

The Ethics and Compliance Committee supervises the Ethics Line.

ETHICS AND COMPLIANCE COMMITTEE

We have an **Ethics and Compliance Committee** made up of members of the Board of Directors, at least one of whom is an independent member.

The Committee is responsible, together with the Compliance Officer, for promoting the Company's values and principles in an ethical and transparent manner.

Additionally, it must ensure compliance with this Code and other internal regulations, and investigate any breach of the latter, taking any necessary measures.

COMPLIANCE OFFICER

The **Compliance Officer** is responsible for implementing and monitoring the **Integrity Program** and fostering an ethical and transparent culture in the Company.

Compliance

We have an independent and autonomous Compliance area responsible for raising awareness about ethics, transparency and compliance throughout the Company.

It can help you understand internal rules and guide you in resolving ethical dilemmas.

AMENDMENTS AND EXEMPTIONS

There are no exceptions to the provisions of this Code. Any exemption of the provisions of this Code must be granted only by the **Ethics and Compliance Committee**.

The Compliance area will be responsible for reviewing and, if applicable, updating this Code at least every three years.

Loma Negra is responsible for publicly disclosing any relevant amendments or modifications to this Code of Ethics and Conduct, in accordance with applicable regulations.

SANCTIONS

Failure to comply with the provisions of this Code or other Company's policies or rules and/or regulations in force and the law will be considered a serious offense and may give rise to the application of disciplinary sanctions and/or corrective measures that may range from a verbal warning, suspension or even termination of the employment or contractual relationship as appropriate and may eventually lead to the filing of legal actions.

For those affected, under no circumstances may ignorance of this Code be alleged, nor may violations of it be authorized, consented to or tolerated.