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I. PURPOSE AND SCOPE

This Policy sets out guidelines for responsible behavior in order to prevent, detect and promptly eliminate acts related to anti-competitive conduct; thus, properly complying with our Code of Ethics and Conduct, as well as with the laws and regulations on Free Competition applicable in the countries where we operate.

This policy is applicable to the Grupo UNACEM, including UNACEM CORP. S.A.A. (hereinafter, the "Company") and its Subsidiaries (hereinafter, "Business Unit"), and its directors, managers and other workers (hereinafter, "the workers").

II. FREE-COMPETITION POLICY


Our Code of Ethics and Conduct, Chapter 2, Section d), sets out the following:

- *We seek to win the preferences of our customers based on the value we can generate in our products and services, and we reject unfair practices.*
- *We assume a preventive role regarding the risks of non-compliance, and we will not tolerate any type of conduct that may threaten free competition, affect economic agents and the market.*

III. PRINCIPLES TO MAINTAIN AND PROMOTE RESPONSIBLE FREE COMPETITION PRACTICES

The following guidelines help us focus our activities on respect for free competition:

- We defend free competition and comply with the corresponding regulations, as a duty and a right of special importance. A market that operates under free competition allows for efficiencies that benefit competitors, suppliers, consumers, customers, and the Government.
- We compete in the market based on our quality, price, and service, in full compliance with the laws that regulate consumer protection and free and fair competition, among others, in each country where we operate.
- We make our business decisions autonomously and independently, such as what products to offer, how to do it, at what prices, how many, in what places and regions, among others.
- Our commercial policies are designed and applied following objective criteria, without arbitrarily discriminating our customers, respecting the autonomy of market agents. Our commercial policies may never be designed, construed, or applied so as to have the purpose or effect of excluding or restricting the competitive process.

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- We encourage building relationships with our customers and suppliers based on respect, equity, trust, and transparency.
- We choose customers and suppliers under evaluation criteria that consider their career, suitability of their technical and economic proposals and the defined terms of reference, respecting the applicable laws.
- We promote the communication of clear, truthful, and timely information in the promotion of our products, avoiding false information that affects consumer rights.
- We periodically analyze our operations in order to determine the potential risks related to free competition and establish the pertinent mitigation measures to deal with them, within the applicable legal frameworks and good practices.

IV. DEFINITIONS OF POTENTIAL RISKS OF BREACH OF COMPETITION

Free Competition allows any person or company to be free to participate in a certain economic activity, either as a seller or as a buyer. When there is Free Competition, companies or people are free to enter or leave a market, and they also have complete freedom to set the price of their products or services in order to attract the preferences of their customers. Customers are free to choose which products they will buy and which suppliers they want to go to.


To ensure Free Competition in the markets, it is sought to prevent companies from illegally using their market power, abusing their position, or colluding with competitors, customers, suppliers to obtain undue commercial benefits. Some behaviors that may derive in anticompetitive behaviors are detailed below.¹

4.1 Abuse of dominant position

Abuse of a dominant position is considered to exist when a company that holds a dominant position in a certain relevant market uses said position to unduly and unilaterally restrict competition, with the purpose of obtaining benefits and harming actual or potential, direct or indirect competitors, which would have not been possible if such company had not held that position. To consider that a company has a dominant position, the competitors, suppliers and/or customers of said company must be incapable of counteracting the actions taken by the company within a reasonable period of time.

These behaviors include unjustifiably refusing to satisfy purchase demands or accept offers to sell or provide goods or services; or unjustifiably hinder a competitor from entering or remaining in an association or intermediation organization.

¹ Including, but not limited to the behaviors listed.

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4.2 Horizontal Collusive Practices (cartelization of prices, commercial conditions, market sharing and/or production)

Horizontal collusive practices include agreements, decisions, recommendations, or concerted practices carried out between competitors with the purpose of restricting or impeding Free Competition.

These practices include concerted fixing of prices or other commercial or service conditions; the concerted distribution of customers, suppliers or geographical areas together with competitors; agreement with competitors regarding the participation in public or private biddings, whether it is the distribution of said biddings or agreement of the conditions offered; or agreement with competitors on working conditions of personnel or agreements not to attract personnel from competitors.

4.3 Vertical Collusive Practices (agreement with suppliers and/or customers to affect competitors)

Vertical collusive practices occur among economic agents that carry out activities at different levels of the production or marketing chain (for example, suppliers, manufacturers, wholesale distribution channels and merchants), whose purpose or effect is to restrict or impede Free Competition.


For vertical collusive practices to occur among economic agents, it is required that at least one of them possess, prior to the exercise of the practice, a position of dominance. The main difference of this figure with the abuse of a dominant position explained in paragraph 4.1 is that agreements, decisions, recommendations, or concerted practices between two or among more economic agents are considered in this case. In this regard, a common will is required to restrict competition.

As an example, an agreement between a company with a dominant position (manufacturer) and its distributors so that this company can only sell their products could be considered a vertical collusive practice, in order to prevent the entry of a new manufacturer.

4.4 Collusive Practices in the field of human resources management (agreements that affect job seekers or workers)

One of the typical risks in the Human Resources Management area includes "non-poaching agreements" which consist of a type of collusion or anticompetitive agreement between competitors that takes place in the labor market, where agreements are typically made not to "steal employees from the competitor", an act that violates free competition.

Another example of risk is the "wage-fixing agreements", where two or more companies agree on aspects related to the working conditions of their employees, such as their compensation, an act that can also violate free competition.

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V. PERSON RESPONSIBLE FOR THE POLICY AND THE REVIEW THEREOF

The Board of Directors is responsible for this policy, which is part of the Comprehensive Compliance System and the anti-bribery management system. The Ethics and Conduct Committee supervises the execution of its content through monitoring, evaluations, and reports carried out by the Corporate Director of Risks and Compliance.

The Corporate General Manager is in charge of ensuring the implementation of the Corporate Free-Competition Policy. The General Managers of the Business Units shall adopt all the necessary measures to ensure compliance with free competition laws and regulations and adoption and compliance with appropriate business free competition policies and practices, including, but not limited to, this policy. Furthermore, General Managers are responsible for taking the necessary measures to ensure that the personnel under their supervision comply with said policies.


The Corporate Risk and Compliance Department shall review and update this policy when any significant change occurs in the environment of the UNACEM Group or at least every two years.

In the UNACEM Group, everyone has the individual responsibility to comply with the rules and guidelines established herein, as well as to seek guidance² in the event of any doubt or need to analyze whether an activity may violate the rules of free competition. Disciplinary measures and sanctions shall be applied to those who fail to comply with the provisions of this policy, as set out in the Internal Regulations (for example, Internal Work Regulations of each Business Unit).

VI. REFERENCE DOCUMENTS

- a) Code of Ethics and Conduct.
- b) Internal Regulations of the Board of Directors.
- c) Internal Work Regulations of the Business Unit.
- d) Corporate Anticorruption Policy.
- e) Corporate Policy for Comprehensive Risk Management.
- f) Free competition laws applicable to each Business Unit.

² For guidance, contact the Legal or Compliance officer of your Business Unit or the Corporate Director of Risks and Compliance of the Company.

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Document Name	CORPORATE FREE COMPETITION POLICY			Version
Responsible Area	Corporate General Management			
Prepared by	José Luis Perry Legal Manager – UNACEM Perú Fernando Dyer Corporate Director of Risk and Compliance	Date of Preparation	NOV/07/2022	1.0
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