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I. PURPOSE AND SCOPE

Through this Corporate Policy on Labor Harmony (hereinafter the "Policy"), we establish the guidelines applicable to Grupo UNACEM, which includes UNACEM Corp. S.A.A. (hereinafter the "Company"), its Subsidiaries (hereinafter the "Business Unit"), its Directors, and employees (hereinafter "Employees"); in terms of responsible labor practices, promotion of a respectful work environment, encouraging Employees to develop professionally and work together effectively, as well as the prohibition of discrimination, and the prevention and fight against workplace and sexual harassment.

If local legislation where Grupo UNACEM operates imposes greater restrictions than the provisions of this policy, the most stringent one in that jurisdiction must apply.

II. CORPORATE WORKPLACE HARMONY POLICY

Our Code of Ethics and Conduct (CODEC) tells us in its chapter 3 on "Our responsibilities to workers", sections a) Mutual respect and discrimination-free environment and d) Sexual harassment and workplace harassment, the following:

- a) *"We are convinced that a good work environment, with valued and committed people, will have a positive impact on achieving our goals.*


We foster mutual respect among all our employees to promote a positive working environment, inclusive and equitable between men and women, in which everyone can fully develop.

We promote equal opportunities based on skills and abilities, without distinction based on origin, sex, sexual orientation, culture, religious beliefs, disability, and/or socioeconomic status. We reject and do not tolerate discrimination, harassment, or bullying, and we take the necessary disciplinary measures in any case that arises.

We value the diversity of our people's contributions, which enhances our opportunities for continuous improvement. The diversity of people and cultures within Grupo UNACEM constitutes an extraordinary competitive advantage."

- b) *"We promote a work environment free from all forms of sexual harassment and violence, where there is no offensive or hostile treatment toward another person, whether written, verbal, or through social media.*

Sexual harassment and workplace bullying sometimes manifest themselves as jokes, or even insults or explicit gestures. Therefore, we consider such behaviors unacceptable and sanction them, including inappropriate conduct and abuse of authority."

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III. CRITERIA THAT SUPPORT THE PREVENTION OF DISCRIMINATION, HARASSMENT AND SEXUAL HARASSMENT AT WORK

The following criteria support prevention efforts:

1. Dignity

We act with the understanding that the individual and respect for his or her dignity are the supreme goal of society and the State. We defend the right to express disagreement and value the time and effort of others. Through our actions, we promote equity, trust, and transparency.

2. Healthy Environment

Every person has the right to perform their work or similar activities in a healthy and safe environment that allows them to preserve their physical and mental health and foster their professional development and performance.

3. Equality

We promote equality among people, regardless of their sex or gender. Any type of distinction, exclusion, or restriction based on sex, gender identity, or sexual orientation that has the purpose or effect of undermining or nullifying the recognition, enjoyment, or exercise of people's rights constitutes discrimination and is prohibited.

We make professional decisions based on qualifications, merits, and talent, ensuring that all employees have equal opportunities, without distinction.


4. Respect

We foster a respectful work environment for people of diverse cultures, whether they are colleagues, business partners, or clients, to ensure that everyone has a fair and equal opportunity to contribute their talents and reach their full potential.

We promote open and transparent communication across all levels of Grupo UNACEM.

IV. Guidelines

The Corporate Workplace Harmony Policy is aligned with compliance with our Code of Conduct, establishing the principles that guide our responsibilities as Employees, based on mutual respect and an environment free from discrimination, harassment, or sexual harassment at work.

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1. Rejection of Workplace Discrimination

Discrimination involves treating an employee, or a group of employees, differently or less favorably because of a protected characteristic. This may include unfair treatment, harassment, inappropriate questions, or retaliation.

At Grupo UNACEM:

- a) We reject all forms of discrimination against applicants, employees, third-party contractors, suppliers, and partners.
- b) We do not tolerate discriminatory behavior or workplace harassment based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), military or veteran status, marital status, gender, gender identity or expression, or any other class protected by law, national origin, disability, or age.

2. Rejection of Workplace Harassment

Workplace harassment consists of verbal, physical, or visual behavior that creates an offensive, hostile, or intimidating work environment, or that prevents someone from performing their job. It can affect morale and make us less productive, and includes bullying, discrimination, victimization, violence, or other types of offensive behavior.


At Grupo UNACEM, we reject all forms of harassment, including:

- a) Communication that includes offensive language, insults, jokes, slander, negative stereotypes, or threats.
- b) Nonverbal or psychological conduct such as staring, stalking, or the giving of unwanted gifts.
- c) Offensive images, statements, or posts on social media.
- d) Abusive throwing of objects.
- e) Deliberate isolation, professional discrediting, or intentional work overload as a form of pressure or punishment and/or with the intention of damaging the Employee's reputation.
- f) Constant use of nicknames, derogatory nicknames, or intimidating or mocking gestures intended to embarrass an employee, creating a hostile work environment.
- g) Other similar behaviors.

3. Rejection of Sexual Harassment

Sexual harassment is a form of violence that occurs through conduct of a sexual or sexist nature or connotation that is unwanted by the person against whom it is directed.

This conduct may create an intimidating, hostile, or humiliating environment, or negatively impact on the employee's work, training, or any other sphere. These consequences do not need to materialize, nor does it require a repetition of the conduct, or for the victim to have expressed their rejection for it to occur.

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At Grupo UNACEM, we do not tolerate any manifestations of harassment, which include:

- a) Explicit or implicit promises of preferential or beneficial treatment regarding their current or future situation in exchange for sexual favors.
- b) Threats that implicitly or explicitly demand unwanted behavior that violates or insults the employee's dignity, or pressure or intimidation with the aim of receiving attention or favors of a sexual nature, or to meet or go out with the aggrieved employee.
- c) Use of verbal or written expressions with sexual connotations, insinuations, or propositions of a sexual nature, as well as obscene, hostile, humiliating, or offensive gestures toward the affected person. This includes, but is not limited to: written messages with sexual content, indecent exposure, sexually oriented jokes, suggestive questions or comments, sexually explicit jokes or compliments, sexually explicit conversations or phone calls, repeated leering, insistence on requesting dates after being rejected, comments about the person's sex life, or repeated exposure to images, drawings, graffiti, magazines, videos, calendars, or any other visual media with sexual content.
- d) Physical advances, rubbing, groping, or other physical conduct of a sexual nature that is offensive and unwanted by the victim, such as: brushing, leaning against, cornering, kissing, hugging, pinching, patting, intentionally obstructing access, among other similar conduct.
- e) Offensive or hostile treatment due to rejection of the aforementioned conduct.

4. Guidelines for the investigation and sanction of cases of discrimination, harassment, and sexual harassment at work

At Grupo UNACEM:

- a) We intervene promptly, immediately implementing measures to prevent acts of discrimination, harassment, and sexual harassment, as well as protective measures for potential victims, in order to respond effectively.
- b) We initiate an investigation procedure either at the request of the alleged victim or a third party, or ex officio, when the company learns, through any means, of facts that allegedly constitute acts of discrimination, harassment, or sexual harassment at work, in accordance with the corresponding procedure and legislation.
- c) We have established a Sexual Harassment Intervention Committee, which is the collegiate body that will investigate reports of acts of sexual harassment and issue recommendations for sanctions and complementary measures to prevent further cases. Its composition, designation of representatives, and operation are governed by current regulations and applicable jurisdictions.
- d) We facilitate access to protective measures for the complainant, adopting measures that seek to protect and ensure the complainant's well-being.

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- e) We maintain the confidentiality of the information contained in the investigation procedure, except for the exceptions established by applicable law.
- f) We guarantee respect for all fundamental rights and guarantees inherent to due process and the dignity of the individual in the procedures initiated.
- g) Complaints regarding sexual harassment in the workplace are submitted verbally or in writing to the Human Resources leader, regardless of where the events occur. If a complaint is filed through the Ethics Line (section IV), it will be immediately forwarded to the Human Resources leader for further processing, in accordance with applicable law.
- h) We comply with applicable local and international regulations and standards, maintaining the applicable standards based on the country and operations.

5. Training and Diffusion

At Grupo UNACEM, we implement training and outreach programs to:


- a) Ensure a proper understanding of the standards of conduct established in this Workplace Harmony Policy.
- b) Raise awareness about the importance of preventing and identifying acts of discrimination, harassment, and sexual harassment in the workplace.
- c) Provide information on channels for addressing inquiries, complaints, and reports, and review the effectiveness of these mechanisms.

IV. ETHICS LINE

Grupo UNACEM has an Ethics Hotline, the reception portal of which is managed by an external provider and supervised by the Ethics and Corporate Governance Committee. Through this channel, employees, suppliers, stakeholders, and the public can file complaints regarding noncompliance with the Code of Ethics and Conduct, this Policy, or ask questions related to ethical conflicts.

The Ethics Line has the following channels through which concerns, questions, or complaints can be addressed:

- a) Website: Ethics line - Grupo UNACEM
- b) Email: eticagrupounacem@pwc.com
- c) Toll-free telephone lines:
 - Perú: 080018422
 - Chile: 188800201271
 - Ecuador: 1800001517
 - United States of America: 18334313405

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At Grupo UNACEM,


- a) We respect the confidentiality of information. The interested party may file a complaint or inquiry anonymously if they wish. All complaints will be investigated impartially, and sanctions or corrective measures will be taken when violations of the CODEC or this Policy are confirmed.
- b) We promote the correct use of the reporting channel among Employees, encouraging the submission of truthful information.
- c) We do not tolerate retaliation or threats against any Employee or third party who, in good faith, reports potential violations or non-compliance with the CODEC, this Policy, or who collaborates in an investigation. Retaliation or threats against the whistleblower and/or any Employee who collaborates in an investigation will be considered serious misconduct.
- d) If an Employee, or any person doing business with Grupo UNACEM, is determined to have violated this Policy, they may face consequences that include termination of employment or cancellation of their contract.
- e) Upon confirmation of conduct that violates or breaches this Policy, Grupo UNACEM will adopt corrective and disciplinary measures based on the facts of the situation, in accordance with the severity of the violation and in accordance with internal regulations (Internal Work Regulations) and applicable laws, which may include:
 - i. Verbal or written warning
 - ii. Mandatory training
 - iii. Temporary suspension
 - iv. Reassignment of duties or change of work team
 - v. Termination of the employment relationship or cancellation of contract
 - vi. Notification to external entities if the conduct constitutes a crime.

V. RESPONSIBILITY FOR POLICY AND ITS REVIEW

The Corporate Vice President of Talent and Culture is responsible for this Policy, ensuring its compliance, and answering questions. The Ethics and Conduct Committee oversees its implementation through monitoring, evaluations, and reports prepared by the Corporate Vice President of Talent and Culture.

Business Unit General Managers must take all necessary measures to ensure compliance with this policy and applicable laws and regulations, and that appropriate business practices are adopted and adhered to, including, but not limited to, this policy. They are also responsible for taking the necessary measures to ensure that their personnel comply with these policies.

The Vice President of Talent and Culture must review and update this policy when any significant changes occur within Grupo UNACEM environment, or at least every two years.


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At Grupo UNACEM, everyone has an individual responsibility to comply with the rules and guidelines established here, as well as to seek guidance if they have any questions.

Disciplinary measures and sanctions will be applied to those who fail to comply with this policy, as regulated in the Internal Regulations (for example, the Internal Work Regulations of each Business Unit).

VI. REFERENCE DOCUMENTS

- a) Grupo UNACEM Code of Ethics and Conduct (CODEC)
- b) Business Unit Internal Work Regulations
- c) Business Unit Sexual Harassment Reporting Procedure
- d) 2021-2050 Sustainability Declaration
- e) Grupo UNACEM Corporate Human Rights Policy
- f) Grupo UNACEM Corporate Diversity and Inclusion Policy
- g) Applicable legislation

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Nome of Document	Corporate Workplace Harmony Policy			Version
Department Responsible	Human Resources			
Prepared by	Silvana Pérez Corporate Compliance Manager	Date of Preparation	05/06/2025	1.0
Reviewed by	Marlene Negreiros Corporate Vice President of Talent and Culture	Date of Review	05/06/2025	1.0
Reviewed by	José Luis Perry Corporate Legal Manager	Date of Review	05/06/2025	1.0
Reviewed by	Fernando Dyer Corporate Director of Risks and Compliance	Date of Review	05/06/2025	1.0
Reviewed by	Pedro Lerner Chief Executive Officer	Date of Review	05/06/2025	1.0
Approved by	Ethics and Conduct Committee	Date of Review	05/19/2025	1.0
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