

1 PURPOSE

The purpose of this Corporate Standard is to define the acts and activities considered illegal by the Company (which should be completely avoided), to instruct its Managers and Professionals how to identify and avoid them, to present the responsibilities of each agent in the identification and prevention process of such acts and activities and the consequences for the Company and each of the individuals involved.

2 DEFINITIONS AND ACRONYMS

ADVANTAGE OR UNDUE PAYMENT / FACILITATOR - Undue payments and advantages to public officials, government officials and public agents may be considered: cash, gifts, travel, entertainment, job offers, meals, illegal campaign contributions, improper sponsorship of events, scholarships, luxury items, jewelry or precious stones, charitable contributions, etc. It may also be a payment to a public official to ensure or expedite the performance of an action or service to which a person or Company has a normal and legal right. For example, payments for obtaining authorizations, licenses and other official documents, regulatory approvals, blocking a competitor's bidding, reducing taxes, avoiding customs charges or fees, processing government documents such as visas and service orders; provision of telephone services; water and electricity supply, etc.

BOARD OF DIRECTORS (CAD) - the Company's collegiate deliberation body, responsible for the approval of relevant matters in the conduct of social and strategic business, pursuant to the Articles of Incorporation and the terms of applicable law.

BUSINESS UNIT - Businesses and countries served by InterCement (Austria, Argentina, Brazil, Egypt, Luxembourg, Mozambique, Netherlands, Paraguay South Africa, and Spain)

COMPANY (S) - InterCement Participações S/A and its controlled companies.

CONTRIBUTION - donation, sponsorship, support, financial support, etc., performed or received by the Company.

ENTITIES - Communities, public or private bodies, associations, institutes, unions or any other organization created to carry out financial, cultural, labor or political activities.

FINANCING TERRORISM AND DRUGS, WEAPONS OR HUMAN TRAFFICKING - Terrorist financing is a form of money laundering. However, in analyzing underlying criminal activities (e.g. drug, arms or human trafficking), the patterns of activity tend to differ for terrorism-related to "laundering". For example, terrorist financing often involves very small volumes of funds, which can be moved through charities or non-arbitrary banking systems, while money

laundering from narcotics and arms sales or from human trafficking typically involves the movement of large volumes of funds.

FRAUD - an act of bad faith, of deceiving and harming people to obtain things of undue value. In addition to lying, fraudsters often falsify documents, identities, brands, products, etc.

ILLICIT ACTS – Illicit acts are all voluntary, reckless or negligent actions or omissions, prohibited or unacceptable by law. Examples: money laundering; financing of terrorism, drug, human or weapons trafficking; influence peddling; use of office to gain improper advantage for yourself or others; provision of material for the construction or storage of chemical or mass destruction weapons; tax evasion, advantage or improper payment; fraud; corruption; antitrust, etc.

INFLUENCE TRAFFICKING - taking advantage of one's position in an organization, or dealing with people in authority, to improperly obtain something of value and / or benefit for oneself or others.

INTERMEDIATE AGENT – Any person who does business on behalf of InterCement with other entities.

MANAGERS - are responsible for managing and managing the Company's business and operations. For the purposes of this Standard they are represented by Middle Management, Management, Senior Management and Executives.

MONEY LAUNDERING - is the attempt to hide or disguise the proceedings of illegal activities so that they appear to come from legitimate sources or activities. Money laundering can and does take many forms, but typically occurs in 3 steps:

1. Placement: is the stage at which funds derived from illegal activities are introduced into the financial system anywhere in the world;
2. Layering: involves performing one or more transactions to disguise the track of the operation and make it difficult to identify the initial source of funds;
3. Integration: This is the stage when funds are sent back to the money launderer already appearing to be legitimate transactions.

PAYPAL – is a digital wallet where you can register your credit cards and / or add credits. When making a payment by this means, simply login to your account with your username and password and choose which of the registered methods you want to use.

PROFESSIONALS – For InterCement, professionals are those who establish any working relationship with the company, regardless of their position, function, activity or length of time.

PROVIDING MATERIAL FOR CONSTRUCTION OR STORAGE OF CHEMICAL WEAPONS

OR MASS DESTRUCTION - Our commercial product, cement, can be used to construct spaces for the storage of weapons of mass destruction or chemical weapons.

TAX EVASION - It is the willful concealment, through fraud, cunning or skill, of the collection of taxes to the Public Authority.

THIRD PARTY - an individual or corporate InterCement service provider, supplier or business partner. Examples: attorney, advisor, consultant, contractor or subcontractor, forwarder, distributor, contractor, manufacturer, intermediary, laboratory, representative, reseller, etc.

3 RESPONSIBILITIES AND ASSIGNMENTS

All professionals of the Company must know, follow and disseminate the contents of this Standard and other related standards, in particular the Code of Conduct, the Anti-Corruption and the Antitrust Relationship Standards.

However, the following responsibilities should be highlighted:

Professionals: to follow and respect this Standard, and to prevent, identify and communicate to their managers and the Legal and Compliance areas the weaknesses in the processes and systems that may be used as means for the execution of unlawful acts of any nature involving the Company. It is also the duty of every professional to follow the Corporate policies and rules, the procedures and rules existing in his/her Business Unit, this includes, but is not limited to, the prior verification of the good faith and good repute of our third parties, intermediaries, partners, suppliers, customers and service providers.

The responsibilities described herein do not exempt Professionals from respecting the other responsibilities specific to each of their positions.

Managers:

- i. ensure that the risks of unlawful acts occurring in the activities under its management are properly identified, controlled, monitored and mitigated;
- ii. disseminate the risk and control culture in the area (s) under its responsibility through constant training, ensuring compliance with internal standards and regulatory aspects, ensuring the effectiveness and integrity of controls;
- iii. test internal controls related to preventing and combating illegal acts
- iv. clearly define the means for monitoring risks in their respective areas and departments.

Corporate Legal Department:

- i. to be the guardian of this Standard, being also responsible for implementing and

keeping it up to date with the specifications of the local legislation of each Business Unit;

- ii. together with the HR area, conduct the necessary training to know and ensure compliance with this Standard;
- iii. advise the other areas of the Company on matters related to this Standard;
- iv. define and oversee the monitoring of compliance with this Standard, together with the Compliance area.

HR:

- i. comply with the sanctions and guidelines defined by the Ethics and Compliance Committee in relation to the professional who committed an act or activity considered illegal;
- ii. Conduct communication processes related to this Standard.
- iii. together with the Legal Department to conduct the necessary training.

Ethics and Compliance Committee: Together with the Legal Department and the Compliance area:

- i. assess the origin or otherwise of the unlawful act and / or activity and, where applicable, propose actions and sanctions;
- ii. collect and monitor action plans designed to deal with situations encountered,

Audit, Risk and Compliance Committee:

- i. to evaluate the results of the analyzes brought to their knowledge associated with the reported / identified illegal acts;
- ii. inform members of the InterCement Board of Directors (CAD).

Compliance area: Through existing instruments such as the Ethics Line and the monitoring process itself and others:

- i. identify possible unlawful acts and activities;
- ii. monitor the implementation of action plans defined and approved by the Ethics and Compliance Committee.

Audit area:

- i. identify possible unlawful acts and activities and, if necessary and approved by the Ethics and Compliance Committee, trigger forensic investigation. In case special procedures are adopted, they should be discussed in the Ethics and Compliance Committee;
- ii. coordinate applicable forensic investigations;
- iii. discuss the outcome of the work with the members of the Ethics and Compliance Committee.

Nevertheless, in the course of their daily activities, everyone has the obligation to prevent, identify and report to their managers or the Ethics Line the occurrence or suspected violation of this Standard, as well as weaknesses in the processes and systems that may be used as means for carrying out unlawful acts.

The Company accepts anonymous reports, guarantees the confidentiality of the identities of those who identify themselves and does not allow any act of retaliation to those who make a report in good faith.

4 CRITERIA AND RULES

Please note that illegal acts and activities related to:

- a) Conduct are dealt with in the Company's Code of Business Conduct, such as the offering and receiving of gifts and courtesies, relationships with the Public Administration and the market.
- b) Public Administration, involving for example, corruption, frustration of public tenders, bribery and facilitation payments and / or exchange of favors to public agents, are dealt with in the Corporate Anti-Corruption Standard.
- c) Cartel formation, infringement against free competition and others associated with the relationship with the market are dealt with in the Corporate Competition Relations Standard.
- d) Participation in operations clearly with conflicts of interest and misuse of insider information and exchange of personal and financial favors are dealt with in the Conflict of Interest Standard.

4.1 General Guidelines

- It is prohibited to practice, directly or indirectly, any unlawful act in or through the

Company's activities, businesses and operations;

- It is forbidden to collude, neglect or co-author any unlawful act involving the Company;
- It is prohibited to conduct, on behalf of InterCement or its subsidiaries, any transaction with or for the benefit of any person or corporation included in the Specially Designated Nationals and Blocked Persons list of OFAC (Office of Foreign Assets & Control) from United States (available at www.treas.gov/ofac), or the UN Security Council Consolidated List of Sanctions Persons (<https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>) or the Consolidated List of European Union Sanctioned Persons, Groups and Organizations (<https://webgate.ec.europa.eu/europeaid/fsd/fsf/public/files/csvFullSanctionsList/content?token=n002a0ht>), or lists that may replace them. In case of doubt or if the above links are no longer valid, the Corporate Legal Department should be contacted.
- It is prohibited to conduct, directly or indirectly, any business, contract, act, etc., that demonstrates or appears to demonstrate a Conflict of Interest.
- There is no tolerance for practice of illegal actions.
- Professionals will respond individually for the active or passive practice (negligence, malpractice or recklessness) of the illegal act.

4.2 Financing of Terrorism and Trafficking in Drugs, Weapons or Persons.

InterCement prohibits, in its activities and businesses, any act that may constitute support or financing for terrorist actions, drug, weapons or human trafficking in Brazil or abroad.

4.3 Supply of material for the construction or storage of chemical or mass destruction weapons.

If the Company suspects or has information that the cement will be used to construct spaces for the storage of weapons of mass destruction or chemical weapons, the product should not be supplied and the customer should be reported.

4.4 Fraud

InterCement prohibits, in its activities, business and operations of any nature that may constitute fraud. Examples:

- i. Adulterate payee.
- ii. Adulterate results, documents or processes (sales, purchasing, administrative,

- financial, etc.) to meet goals of any kind.
- iii. Increase spending amounts or invent them to divert money from the company or use any other means for such purpose.
 - iv. Counterfeit signatures on checks, documents, etc.
 - v. Falsify or adulterate documents, reports or records of any kind.
 - vi. Counterfeit or tamper with payroll, commissions, compensation, etc.
 - vii. Counterfeit or make sales, purchases or transfers that did not exist.
 - viii. Make duplicate, unauthorized payments, or incur in expenses that are not supported by formal documents.
 - ix. Subtract or misuse company goods and assets.
 - x. Subtract or misuse financial or non-financial resources.
 - xi. Use procedures that violate laws to suppress or reduce taxes or contributions.
 - xii. Use company resources to purchase products or services for yourself or others.

4.5 Money Laundering

InterCement prohibits in its activities and business any act that may constitute concealment or dissimulation of the nature, origin, location, disposition, movement or ownership of assets, rights or values arising, directly or indirectly, from criminal offense. In this sense, we adopt practices of:

- a) Risk assessment and monitoring of the raising, intermediation and application of own or third party funds, in national or foreign currency, in order to prevent them from coming or feeding illegal transactions;
- b) Prevention and fight against tax evasion or misuse of resources;
- c) Fraud prevention and combat;
- d) Failure to use the services of financial institutions that may be characterized as shell banks or as nested financial institutions;
- e) Prior and regular inquiries from our main Third Parties - special care must be taken in real estate and foreign exchange transactions;
- f) Previous due diligence in Merger and Acquisition processes.

4.6 Relations with Third Parties

Just as we value fairness, transparency and ethics in the relationship between InterCement and Public Administration, we understand that:

- a) Third party selection and hiring processes must follow fair and impartial criteria, always bearing in mind InterCement's legitimate interests;
- b) We avoid having business or personal relationships with our third parties that constitute actual or presumed conflicts of interest;
- c) Payments made to agents acting as intermediaries between InterCement and the Public Administration (such as lawyers, accountants, brokers, consultants, among others) must be specified in service contracts to be duly recorded in the accounts in specific accounts;
- d) Wherever possible, it is InterCement's duty to ensure, through contracts, due diligence and audits, that our third parties have a good reputation and adopt a sound Corporate Integrity Program designed to prevent and combat unlawful and unethical acts.
- e) Third party agreements have a clause whereby third parties must accept and comply with all terms of the InterCement documents listed below:
 - I: Code of Business Conduct;
 - II: Corporate Anti-Corruption Standard;
 - III: Corporate Standard for Relationship with Competition.

4.7 Red Flags

- Money laundering can be done through traditional and non-traditional, clandestine and non-bank means, including, but not limited to: tellers, electronic money transmitters (e.g.: PayPal), informal money transfer systems (e.g.: black market exchange of securities), securities brokers; casinos and card clubs, insurers, real estate companies (e.g.: lenders, people involved in deals and foreclosures), exporters / importers, retailers (e.g.: stores offering luxury items such as precious metals, stones, art, etc.); or even through third party providers (lawyers, accountants, etc.).
- Agreements with companies that are not able or qualified to provide the required services is also a sign of attention. For example, consultancy contracts, which may conceal the real intent to conceal capital from money laundering or the source or destination of such capital.
- Other warning signs are:
 - When the supplier/service provider asks for payment to be made to an account in another territorial location or in an unusual manner.

- When a customer demonstrates that they are unaware of the product they purchase, they may be involved in the manufacture or handling of chemical or mass destruction weapons.

4.8 Sanctions

Individuals, as well as the Company, involved in the commission of any Illegal Act or Illicit Activity, whether active or passive, by action or omission, may suffer:

- Disciplinary sanctions under current labor law.
- Sanctions of regulatory oversight.
- Civil and criminal penalties.
- Seizure and confiscation of money.
- Imprisonment.

The Manager or professional will be individually responsible for the active or passive practice (negligence, malpractice or recklessness) of the Illegal Act or Activity.

4.9 Queries

All queries and doubts regarding this Standard should be directed to the Compliance area, Ethics Line, Corporate Legal Department and / or the Offices and / or Legal Management of the respective Business Units.

4.10 Risks

Any breach or omission of the guidelines of this Standard will imply materialization of reputational and financial risks of strong impact on the Company's business. Therefore, should this occur, the Company will adopt disciplinary sanctions.

5 RECORDS

N/A

6 ANNEXES

N/A