

**BUILDING THE FUTURE IS OUR  
NATURE**



# CODE OF ETHICS





# CSM CODE OF ETHICS

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# 01

## INSTITUTIONAL VALUES OF CEMENTOS SAN MARCOS

CEMENTOS SAN MARCOS SAS BIC, through its institutional values and guidelines, has laid the foundations for an intact and strong corporate culture with its stakeholders, having as business ethics fundamentals respect for people, environment, and national and international regulations and laws

These are:

### 1. TEAMWORK

We work together, giving the best of ourselves for the benefit of organizational goals and our stakeholders (Current).

### 2. INNOVATION

We are a team that adapts to change, is observant, visionary, creative, and implements solutions.

### 3. TRANSPARENCY

Transparency among managers, employees, customers, and suppliers to build long-term relationships and grow together.

### 4. INTEGRITY

Act competently, even without being seen.

### 5. RESPECT

Treat others the way you would like to be treated.

### 6. EMPATHY

Ability to feel the other person's need as if it would be our own and act accordingly

### 7. DISCIPLINE

We do things in an orderly and systematic way, in time and under the defined methods

## INSTITUTIONAL PRINCIPLES

- Work hard and be good
- Life, above all else

Detrás de un saco de **Cementos San Marcos** hay gente con **Valores.**

Lo mío es la **Innovación**

Actúo con **Transparencia e Integridad**

Me encanta el **Trabajo en Equipo**

Todo lo hago con **Respeto y Empatía**

Tengo **Disciplina**

Así somos.  
**Buenas personas por naturaleza.**

**San Marcos Cementos**  
**Tipo UG - Uso General**  
Formula única inspirada en nuestra naturaleza

2012 Activo  
Crecimiento constante y sostenido

Construcción rápida y segura en cualquier clima

PESO NETO **50 kg**

## 02

### **CODE OF ETHICS AND ITS SCOPE**

This Code of Ethics contains the set of values, criteria, and standards that reflects the Company's culture and serves as a conduct guideline for the parties involved, as far as their institutional and personal actions are concerned. Guidelines for the correct relationship among them, with other entities, companies, or external persons, and their environment, in general, have been established. Its primary purpose is to promote a harmonious and equitable interaction within the organization and among its different audiences and to ensure ethical behavior by persons who make up the Company towards the rest of society.

It is a document that must be updated on an ongoing basis as specific situations, conflicts of interest, or other issues may arise.

All organizational and personal actions of those engaged with Cementos San Marcos S.A.S BIC must be consistent with the values and standards embodied herein, and its compliance is imperative. This code is mandatory for all stakeholders.

The management level's responsibility is to duly display this code within the organization and ensure its compliance. Likewise, it must be made known to the stakeholders so that they act following the values established in this code.



## 03

# ZERO TOLERANCE POLICY FOR CORRUPTION OR BRIBERY.

### **Prohibition of Bribery and Facilitation of Payments**

At CEMENTOS SAN MARCOS SAS BIC, we do not offer, promise, agreement or grant, directly or through intermediaries, favors, payments, attention, or gifts (from now on, Objects of Pecuniary Value different from ordinary awareness) to national or foreign authorities, their relatives or third parties related to them, to influence their actions, decisions, omissions or functions of their official positions or to obtain undue advantages. Likewise, we refrain from making facilitation payments, understood as those aimed to secure or expedite administrative actions or routine discretionary procedures of any authority. Meals, marketing or institutional gifts, or hospitality to leaders may be granted occasionally if their sole purpose is to strengthen relations with the organization, provided they are reasonable in value and frequency and follow applicable regulations. We never present cash gifts or hospitality that could be interpreted as a way to unduly influence the objectivity of the authorities.

We prohibit using employees' funds to circumvent the prohibition on bribery outlined in this policy. In addition, under no circumstances do we give bribes through third parties outside CEMENTOS SAN MARCOS SAS BIC, such as external agents, consultants, partners, representatives, suppliers, or other intermediaries acting on behalf of the Company.

1. Contributions to charities, donations, gifts, or sponsorships that CEMENTOS SAN MARCOS SAS BIC makes to charities, foundations, associations, non-governmental organizations, or non-profit institutions will always have a lawful purpose and will never serve to cover up acts of corruption or bribery.

2. Contributions to political parties or electoral campaigns: we will exceptionally make contributions to finance electoral campaigns, political parties, or movements whose purpose is to promote democracy. These contributions will always comply with current legislation, follow the maximums established by the competent authority, and will never be intended to obtain undue advantages.

### **Transparency in donations or contributions**

If we make any of the contributions or allowances permitted in this policy, the accounting record of the same must be clear, correct, accurate, and reliable. We do not engage in conduct that hides, changes or omits accounting records to conceal improper activities. Likewise, we have adequate internal accounting audits of these records.

### **Whistle-blowing channel**

If any authority or representative thereof requests payment or benefit prohibited in this policy, we refuse such request or report this situation to the Compliance Officer at [csm.transparencia@csmesa.co](mailto:csm.transparencia@csmesa.co) or through our Transparency Line located on our web page [www.cementosanmarcos.com](http://www.cementosanmarcos.com). Any actions contrary to the provisions of this Code of Ethics may also be reported.

## How to identify reportable conduct

To make decisions at Cementos San Marcos S.A.S BIC, ask yourself the following questions:

1. Is it right to do for Cementos San Marcos S.A.S BIC?
2. Is it legal? Or Is the conduct or activity contrary to national law?
3. Is it consistent with Cementos San Marcos S.A.S BIC's values or my values and contrary to this code of ethics and its policies?
4. Is it inconsistent with the Company's culture and values?
5. Does it negatively affect your personal, family, or work image or the image of the Company?

If the answer to any question is no, the behavior or activity is unethical. Whenever you have a question about conduct or activity, you can also go or report it without fear of retaliation to:

- Our transparency channel  
<https://cementosanmarcos.com/linea-de-transparencia/>
- Your Compliance Officer at e-mail:  
[csm.transparencia@csmsa.co](mailto:csm.transparencia@csmsa.co)

## Anti retaliation

At Cementos San Marcos S.A.S BIC, we are committed to business ethics and transparency, so we will not retaliate against people who complain.

## Sanctions

The omission or breach of the Anti-Bribery and Anti-Corruption Policy will violate the labor or commercial contract with CEMENTOS SAN MARCOS SAS BIC. It will lead to the application of sanctions that may even imply the termination of employment or commercial relationship. Additionally, it may involve fines and administrative or criminal penalties. Ignorance or inadequate understanding of this policy does not entitle its recipients to breach it.



# 04

## GENERAL PRINCIPALES OF BEHAVIOUR AT WORK

Coherence with the values and the duty to dissent.

All organizational and personal actions of those engaged with Cementos San Marcos S.A.S BIC and its contractors must be consistent with the fundamental corporate values.

### **Appropriation of corporate values**

Employees' respect, trust, personal excellence, and integrity towards their work, the Company, their co-workers, family, and society must ultimately be the product of their identification with such values.

### **Personal Integrity**

Employees' sense of belonging, commitment, and loyalty to the Company must ultimately be the product of their identification with these principles and values. Therefore, it is a moral imperative that those who are part of the company share, to the point of making them their own, the basic guidelines of the organizational culture.

### **Duty and freedom to dissent**

Employees have the duty and freedom to express their disagreement with actions, decisions, and activities that go against values, equity, ethics, or human dignity. As a primary duty, this duty to dissent must be exercised responsibly and prudently but firmly and must go to the corporate directors or shareholders in the first instance.

Consequently, one of the first duties of a manager will be to create a favorable atmosphere for his employees to express their differences in a spontaneous, serene, cordial, and positive manner, ensuring that corporate values are respected and fulfilled.

## 05

### **ON CONFLICTS OF INTEREST**

For this code, conflict of interest is understood as any situation or event in which the personal interests, direct or indirect, of the employee, manager, or shareholder, whatever their level, or those of their family or close relatives are or may be in opposition to those of the Company, interfere or may interfere with the duties that are incumbent upon them or lead or may lead them to act in their performance for motivations other than the correct and accurate fulfillment of their responsibilities.

Any person engaged with Cementos San Marcos S.A.S BIC is obliged to report, formally to their boss and in turn to the compliance committee or directly to the Compliance Officer, any behavior of their own or other people's that violates the rules set out in this document.

All managers or persons within the Company must foster the appropriate climate of trust so that any behavior contrary to the provisions of this Code of Ethics can be reported directly or anonymously promptly

Likewise, all managers should immediately take cognizance of the facts that may constitute violations of the rules of this code, investigate them objectively and report them on time to the compliance committee or management committee so that the appropriate disciplinary sanctions and measures may be adopted.

## 06

### **ETHICAL GUIDELINES FOR SHAREHOLDERS**

Ensure that Cementos San Marcos S.A.S. BIC is an instrument at the service of value generation, where wealth and profits are compatible with sustainable social development and respect for the environment. To ensure that all its activities are carried out ethically and responsibly.

Exercise, in an informed and responsible manner, their voting rights in the General Shareholders' Meetings and, in doing so, always demand the ethical performance of the Company, including the approval of the corresponding Code of Ethics, and ensure its practical application.

Seek a fair balance between capital and labor so that workers receive fair compensation for their work through their salaries.

Appoint to management positions people who have the appropriate qualifications and experience and who exercise their management professionally, ethically, and responsibly.

Define and defend the Company's mission and values in line with the Code of Ethics.

## 07

### **ETHICAL GUIDELINES AND COMMITMENT OF THE CORPORATE EXECUTIVES (FROM GENERAL MANAGEMENT TO PROCESS MANAGERS)**

Perform a professional, ethical and responsible exercise of their activities per the values the Company prioritized.

Do not discriminate against workers for race, religion, age, nationality, sex, or any other personal, sexual, or social condition unrelated to their merit and ability.

Not to allow or exercise any form of violence, harassment, or abuse at work.

Encourage the development, training, and professional promotion of workers.

Ensure health and safety at work, adopting all reasonable measures to maximize the prevention of occupational hazards.

Comply and enforce compliance with the Code of Ethics of the Company and, for this purpose, make it known and establish appropriate mechanisms to ensure its implementation. In particular, there should be a body, ideally a Compliance Committee, composed of persons with sufficient power to enforce the Code and correct violations.

Report promptly and accurately to the owners or shareholders on the situation and prospects of the Company.

Comply and enforce compliance with generally accepted accounting principles and standards and establish internal and external risk management and control systems appropriate to the characteristics of the Company.

Maintain the books and records of the Company with accuracy and honesty to allow obtaining information and making decisions consciously and responsibly.



Provide the Company's external and internal auditors with all the information and explanations required to perform their work.

Subordinate their interests to those of the Company when acting in the name and on behalf of the Company and not use corporate assets for their benefit except with due transparency, with the prior authorization of the relevant corporate body, and for the consideration that is appropriate in the market.

Immediately inform the administrative body of any fact or situation that could involve or lead to a conflict between the interests of the Company and the individual interests of the director or manager, and refrain from intervening in its resolution.

Maintain the confidentiality of the background, data, and documents to which they have access because of their functions in the Company, even after they have ceased to perform them.

Face the payment and fulfillment of the debts and obligations of the Company without delays or unjustified defaults and proceed to the collection of its credits with the diligence that the case requires.

Prepare and maintain a succession plan for critical positions in the Company so that the continuity of the Company does not depend on the permanence of any administrator or manager.

Choose their collaborators and subordinates following the principles of merit and ability, seeking only the interests of the Company.

No director or manager may accept or request, directly or indirectly, gifts or other types of advantages or benefits from our customers, suppliers, or others or from those who aspire to be, such as gifts, payment of expenses or leisure trips, accommodation in real estate for recreation, use of vehicles and any other type of benefit that has a higher value than that of ordinary attention, commonly accepted by the business community, such as a lunch, an agenda, an article of propaganda or similar.

## **ETHICAL GUIDELINES AND COMMITMENT OF THE COMPANY'S EMPLOYEES**

Perform their activities ethically and responsibly per the values prioritized by the Company.

Not to discriminate against employees based on race, religion, age, nationality, sex, or any other personal, sexual, or social condition unrelated to their merit and ability.

Not to allow or exercise any form of violence, harassment, or abuse at work.

Comply with the legal norms established in the employee prohibitions contained in the internal work regulations and additionally guarantee that the following behaviors are prohibited and constitute serious misconduct for the Company:

- Lending money with interest charges to other workers.
- Gain access to benefits granted by the Company and give them a different destination than the one assigned by Cementos San Marcos S.A.S. BIC.
- Report as an accident at work, any accident that has occurred outside their work environment.
- Accept or request, directly or indirectly, gifts or other advantages or benefits from our customers, suppliers, or others or those who aspire to be, such as gifts, payment of expenses or leisure travel, accommodation in real estate for recreation, usufruct of vehicles and any other type of benefit that has a higher value than ordinary attention, commonly accepted by the business community, such as lunch, an agenda, an article of propaganda or similar.

## **ETHICAL GUIDELINES IN BUSINESS RELATIONSHIPS**

### **9.1 With Customers**

At Cementos San Marcos S.A.S BIC, we strive to have severe and professional conduct towards our clients. The satisfaction of their needs is intended, based on equitable treatment and zealous fulfillment of the acquired commitments.

We must formulate and develop marketing and sales strategies in which our products or services are presented as they are without exaggerating their qualities and misleadingly assigning them specifications, uses, or characteristics they do not have.

This rule must be strictly complied with in advertising campaigns and in the professional actions of our sales personnel.

We must always act in good faith and loyalty as the basis for transparent market management. Discriminatory practices, in which some are preferred to the detriment of others, without any objective reason, are therefore condemned. Such methods are undesirable at all times, but especially in times of product shortage.

Refrain from communicating or prematurely leaking information that would allow some to benefit unduly in their business.

No employee may accept or solicit, directly or indirectly, gifts or other types of advantages or benefits from our customers, such as gifts, payment of expenses or leisure travel, lodging in recreational real estate, use of vehicles, and any other type of benefit that has a higher value than that of ordinary attention, commonly accepted by the business community, such as a lunch, an agenda, an advertising item or similar.

## **9.2 With the competitors**

Refrain from carrying out any action that unduly infringes on free competition.

Do not discredit competitors, deceive customers or illegitimately acquire their confidential information.

Accept only contracts awarded in clean processes, where the offer has been successful thanks to its better conditions than competitors. Never agree to, offer or give undue or fraudulent retribution contrary to sound business practice, whether in cash or kind, in exchange for such awards.

The Company's employees, particularly those directly or indirectly involved in the management of the market, shall act following the above criteria, and their transgression shall be considered a severe breach of their duties, even if the purpose sought is to the benefit of the Company.

## **9.3 With suppliers and contractors**

Treat all suppliers with great respect and honesty and ensure transparent and loyal relationships.

Decide or choose a supplier based on quality, product, or service criteria, the economic conditions it offers them, the timeliness of delivery or provision, the service it ensures, and the seriousness, solvency, and soundness of the Company.

Please refrain from providing company data or information for the benefit of potential suppliers, for whom such information would give them an advantage over others who also aspire to contract with the Company.

No employee may accept or request, directly or indirectly, gifts or other types of advantages or benefits from our suppliers, such as gifts, payment of expenses or leisure trips, lodging in real estate for recreation, use of vehicles, and any other type of benefit that has a higher value than that of ordinary attention, commonly accepted by the business community, such as a lunch, an agenda, an article of propaganda or similar.

## 10

### **ETHICAL GUIDELINES FOR RELATIONS WITH STATE-OWNED ENTITIES**

Relations with government agencies, parastatal or public agencies that exercise official surveillance and control functions shall always be governed by legal rules and procedures. The Company disapproves of offering or granting payments in money or in kind, on the initiative of its employees or national or international public officials, to obtain or hasten decisions favorable to the Company.

## PRINCIPLES AND POLICIES OF INTEGRAL MANAGEMENT SYSTEMS

At Cementos San Marcos S.A.S. BIC, we manufacture and market high-quality cement, promoting a culture of continuous improvement, contributing to legal compliance and customer satisfaction, as well as other requirements of our stakeholders, through actions such as:

- High-performance human team
- Managing healthy actions for the prevention of injuries and health deterioration.
- Processes with advanced technology
- Safe working conditions
- Preventing environmental pollution and promoting cleaner production practices
- Avoiding relations with illegal activities, theft, money laundering, and financing of terrorism.
- Managing the risks and opportunities inherent to providing the service, safety, and health at work, the supply chain, and facilities.

CEMENTOS SAN MARCOS SAS BIC has designated the human, technical and financial resources necessary to comply with this policy and expects all employees' commitment, consultation, and participation to ensure continuous improvement.

Senior management must promote the review, evaluation, and monitoring of management systems to ensure compliance with its requirements.

# 12

## WARNING SIGNS

These are some warning signs which are not allowed and are contrary to this code:

- A driver offered me an amount of money if I let him enter the Company's facilities first to do his loading and unloading.
- A customer requested a "commission" payment to be awarded a contract for a significant purchase from the Company or a sale of technology products or services.
- I received an all-expense paid trip to an international destination as a courtesy from a supplier in appreciation of the contract.
- Use of company-supplied assets and resources for other purposes.
- Use of power or trust to offer or receive gifts to facilitate transactions for the Company. (Being effective does not mean skirting national or corporate laws and regulations).
- I am a supplier of the Company, and I agreed with one of the purchasing area's officers to pass a higher-value quotation. This additional percentage would be transferred to their account as in gratitude for purchasing the product with us.

**I have received from Cementos San Marcos S.A.S BIC**

- This code of ethics which I agree to read and comply with.
- I agree to read and comply with the sanctions regime of the code of ethics.
- I have been informed about the whistleblower channel [www.cementosanmarcos.com](http://www.cementosanmarcos.com)

In witness of whom I sign

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**Name** \_\_\_\_\_

**ID. Card** \_\_\_\_\_

**Position or contractor company** \_\_\_\_\_

**Date** \_\_\_\_\_

Let's make a perfect mix, complying with this code of ethics.



**San Marcos** Cementos 