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I. PURPOSE

This corporate standard establishes guidelines and procedures for informing the capital market of significant events affecting UNACEM Corp S.A.A. (hereinafter “UNACEM Corp” or the “Issuer”) and the companies making up its Economic Group (hereinafter “Grupo UNACEM”), as well as to prevent unauthorized use of privileged information in accordance with applicable legislation.

II. RELATED STANDARDS

Legislation

- a) The Approved Text of the Securities Trading Act - S.D. N° 93-2002-EF.
- b) Regulations Concerning Significant events and Reserved Information – SMV Ruling N° 5-2014-SMV-91.
- c) Market Abuse Regulations – Regulations on the Undue Use of Privileged Information and Market Manipulation - SMV Ruling N° 5-2012-SMV-01.
- d) Regulations Concerning Public Offerings and Hostile Take-overs CONASEV Ruling N° 009-2006.
- e) Indirect Property, Non-Arm's Length Companies and Economic Groups – Tax Superintendent Ruling N° 19-2015.
- f) MVNet System and SMV Virtual Regulations – JTax Superintendent Ruling N° 92-2020-SMV/02.
- g) Security Market Penalties Regulations – Tax Superintendent Ruling N° 35-2018-SMV/01.
- h) Companies Act – Law N° 26887.

Internal Standards

- a) Code of Ethics and Conduct.
- b) Internal Employment Regulations.
- c) Corporate Policy on Conflicts of interest.
- d) Regulations for the General Shareholders Meetings
- e) Internal Regulations for the Board of Directors


III. DEFINITIONS

3.1. Significant Event

Any action, decision, agreement, fact, negotiation in progress or information on the Issuer, its securities or its businesses, capable of significantly influencing:

- the decision of a prudent investor on whether to buy, sell or retain a security issued by UNACEM Corp, or
- the liquidity, price or quotation of securities issued by UNACEM Corp.

Annex I includes a list for reference purposes of events that could qualify as significant events.

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3.2. Privileged Information

Means all information on the Issuer, its businesses, or any security issued or guaranteed by the Issuer that is not made available to the market and that, if in the public domain, would by its nature be capable of influencing the liquidity, price or quotation of securities issued.

This definition also includes reserved information and information on transactions in the securities market by institutional investors, as well as public offerings.

Privileged information may refer to Grupo UNACEM or any other company that issues securities traded on the Stock Exchange or placed as part of a public offering.

Annex II includes a list for reference purposes of events that could qualify as privileged information.

3.3. Reserved Information

When facts, acts, decisions, agreements or businesses would constitute Significant Events but premature revelation could prejudice the Issuer, they may be classified by the Board as reserved information and reported as such to Lima Stock Exchange Regulatory Authority (hereinafter SMV).

Reserved Information is always Privileged Information.

3.4. Stock Market Representative

Is the individual appointed by the Issuer to report Significant Events and Reserved Information. Furthermore, he shall be empowered to remit all regular or occasional information that the Issuer is obliged to provide under stock exchange rules.

In addition, his task is to respond in an effective and opportune manner to queries or requirements for information relating to the publication of Significant Events and Reserved Information from the SMV, the stock exchange or the administrators of the centralized trading mechanism.


The Issuer shall have a Stock Market Representative and a deputy.

IV. CONTENTS

4.1. SIGNIFICANT EVENTS

a) Person Responsible

The Stock Market Representative is responsible for reporting Significant Events after disclosure has been approved.

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If the Stock Market Representative doubts whether an event qualifies as a Significant Event, he should consult the Corporate CEO or the Corporate Vice President - Finance to decide on its classification.

If the Significant Event qualifies as Reserved Information, the Stock Market Representative shall ask the Corporate CEO for it to be classified as such by the Board.

b) Reporting Opportunity

All Significant Events must be reported on they day the company becomes aware of them.

If a Significant Event becomes apparent on a non-working day, it should be reported no later than the next working day and before the start of trading on Lima Stock Exchange.

c) Method of Reporting

Significant Events must be reported to the SMV using the MVNet electronic channel.

Equally, all Significant Events must be published on the UNACEM Corp corporate website.

d) Approving disclosure of a Significant Event

The decision to disclose a Significant Event must be approved by the Board of Directors or the Corporate CEO, or in the absence of the latter by the Corporate Vice President - Finance.

4.2. RESERVED INFORMATION

a) Person responsible

UNACEM Corp may, at its own risk, classify an ongoing event or negotiation as reserved information when it believes that premature disclosure could damage the company.

To classify an ongoing event or negotiation as reserved information, at least three quarters (3/4) of the Board of directors must agree to do so.


The Stock Market Representative shall be the person responsible for reporting Reserved Information to the SMV in accordance with the provisions of the following numerals and applicable legislation.

b) Opportunity and manner of Reporting

Reserved Information must be reported to the SMV the day after the Board agrees to classify the ongoing event or negotiation as reserved.

The form and content of the report must be as required by applicable legislation.

c) When information is no longer reserved

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Reserved Information shall cease to be so for the following reasons:

- Disappearance of the causes or reasons for the confidential nature.
- Expiry of the period of confidentiality agreed by the SMV.
- A decision by UNACEM Corp to make the information in question public.

Once the information is no longer reserved, it should be reported to the marked as a Significant Event, except for ongoing negotiations in which no agreement has been reached, without prejudice to UNACEM Corp's right to report it as a Significant Event if its Board of directors so decides.

d) Obligations while classified as reserved information

During the period it is classified as reserved information, UNACEM Corp must observe the following procedures:


- Report to the SMV promptly any act, event or significant decision relating to the reserved information.
- Establish the measures necessary to keep the information confidential.
- Put in place monitoring mechanisms to ensure that only those people on the list of persons sent to the SMV have access to documents, whether physical, electronic or in any information system, meetings and in general any information or document relating to the Reserved Information.
- Report immediately any additions to the list of those people who are aware of the Reserved Information.

4.3. PRIVILEGED INFORMATION

a) Persons possessing such information

Are the following:

- Members of the Board of Directors of Grupo UNACEM companies and their respective secretaries and assistants.
- General managers of Grupo UNACEM companies, those who report directly to them and their respective secretaries and assistants.
- Any other employee or collaborator who, at the discretion of the UNACEM Corp Board, may have access to Privileged Information; such persons shall be informed by the Grupo UNACEM company in question and should be given a copy of this policy.
- Any person who provides services or advice to UNACEM Corp and/or Grupo UNACEM companies who may have access to Privileged Information (such as external auditors, legal advisers and tax advisers, among others) who should be informed of the fact by the company and given a copy of this policy.

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b) Prohibitions:

In accordance with applicable legislation, persons possessing Privileged Information may not:

- Reveal or confide this information to others until it is disclosed to the market.
- Recommend the trading of securities with which the Privileged Information is concerned.
- Make improper use or take advantage of the Privileged Information either for their own benefit or that of third parties.
- These provisions apply not only to persons possessing Privileged Information but also to any collaborator of Grupo UNACEM.

c) Obligations

In addition, persons possessing Privileged Information must undertake to:


- To ensure that Privileged Information to which they have access through their work is duly safeguarded.
- To ensure that whenever Privileged Information is disclosed to other people, they are warned specifically of the privileged nature of the information and, if necessary, to report to the general management of the Issuer or economic group company so that a confidentiality agreement can be entered into.
- To ensure that, within the scope of their functions, the number of people who have access to Privileged Information is kept to the bare minimum.

4.4. BLACKOUT PERIOD

Persons possessing Privileged Information may not buy or sell UNICEM securities or those of Grupo UNACEM companies from the fifteenth (15th) calendar day before the date on which UNACEM Corp publishes its quarterly or annual results in accordance with stock market rules, until the calendar day after the date on which such results are effectively published, inclusive. This period is known as the “Blackout Period”. This period is subject to any extension or change in legislation affecting the publication of the said results.

The limit dates on which UNACEM Corp must publish its results are as follows:

- For interim individual or separate financial statements for the first three quarters, the 30th of April, 31st of July and 31st of October respectively.
- For interim consolidated financial statements for the first three quarters, the 15th of May, 15th of August and 15th of November.
- For the fourth quarter, the final date of publication of the interim individual or separate financial statements is the 15th of February. For interim consolidated financial statements it is the 1st of March.

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- For annual audited individual or separate financial information, the final date is the 31st of March.
- The annual audited consolidated financial statements of the parent company (when the parent company or its securities are registered with the RPMV) must be published by the 30th of April.

In addition, UNACEM Corp's Board of Directors may establish a special "blackout period", which will be disclosed to those holding Privileged Information, in special cases of capital increase, the acquisition or disposal of assets for significant sums, early dividend payments, share transfers, mergers, capital splitting, reorganization, transformation or consolidation, and any other form of corporate restructuring.

"Blackout periods" also apply to UNACEM Corp's transactions involving its own securities.

The Corporate CEO of UNACEM Corp or the person specifically appointed for the purpose by the directors of UNACEM Corp, shall inform persons possessing Privileged Information in writing of the start of the "blackout period".

4.5. TRANSACTIONS WITH THE COMPANY'S OWN SHARES.

Any purchase program for shares issued by any of the Grupo UNACEM companies must be approved by a general meeting of shareholders or by the Board of directors of the issuer.

If the shares are traded publicly, such programs must be reported to the market as Significant Events beforehand.

The program should establish the maximum percentage of shares to be acquired, the maximum investment and the duration of the program.


All programs may be modified or extended in accordance with these guidelines.

Officers responsible for the program shall keep the purchase orders and other steps in the program strictly confidential, as they qualify as Privileged Information for those who are aware of and/or approve them.


V. PERSON RESPONSIBLE FOR THE POLICY ON SIGNIFICANT EVENTS AND PRIVILEGED AND RESERVED INFORMATION, AND FOR REVIEWING THE POLICY

The Corporate Vice President - Finance is responsible for the policy on significant events and privileged and reserved information, as well as for reviewing this policy at least every two years or whenever an important change takes place that affects Grupo UNACEM.

Questions on the application of this policy must be directed at the Corporate Vice President - Finance, who will reply within three business days, and depending on the nature of the query shall be final and binding.

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Document Name	CORPORATE POLICY ON REPORTING SIGNIFICANT EVENTS AND THE TREATMENT OF PRIVILEGED AND RESERVED INFORMATION			Version
Department responsible	Finance			
Prepared by	Álvaro Morales Corporate Vice President - Finance	Date drafted	2/05/2022	1.0
Reviewed by	Pedro Lerner Corporate Chief Executive Officer	Date of Review	23/05/2022	1.0
Approved by	Board of directors	Date of Approval	25/05/2022	1.0

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ANNEX I

Events that can be classified as Significant Events (Annex to the Regulations Concerning Significant Events and Reserved Information).

Callings and Agreements

1. Callings for meetings of shareholders, meetings of creditors or bondholders, indicating the agenda and documentation available to the shareholders, creditors and bondholders, as the case may be, as well as agreements reached at such meetings.

For callings for the obligatory annual general meeting, or equivalent, the Issuer should attach a copy of the audited annual financial information and the annual report, which will be subject to approval.

Exceptionally, when the Issuer is a foreign company with securities registered with the RPMV but is regulated by a foreign stock market, the information required by the previous paragraph may be sent to the SMV as soon as it is available. This applies when, due to the regulatory requirements of the foreign stock market, the information is not available when the shareholders meeting or equivalent is called.

When a meeting is called to discuss a merger, the information provided should include the name of the company or companies with which it is to be merged, the type of business in which each is engaged, the merger mechanism and, if applicable, any economic links between them, in which case the provisions of the Indirect Ownership, Non-Arm's Length Relations and Economic Group Regulations shall apply.


When a meeting is called to discuss equity splitting or other forms of business reorganization, the information provided should include the name and activity of the companies involved, the splitting or reorganization mechanism and any economic links as mentioned in the previous paragraph, between the Issuer and the other companies involved.

The equivalent information should be provided when meetings are called to discuss other forms of business reorganization.

2. Agreements that imply a modification of the by-laws, transformation, merger, equity split and other forms of company reorganization; as well as the restructuring, liquidation and dissolving of the Issuer, in which case, in addition to the respective agreements the following information forms part of the Significant Event:

2.1. For mergers:

- a) A copy of the approved merger project.

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- b) The date on which the agreement takes effect.
- c) The financial statements and all other economic and financial necessary to justify the adoption of the merger agreement between the companies involved. If any of the companies involved in the merger are not registered with the RPMV, the latest audited financial statements and annual report of these companies must also be provided, unless good reasons can be given for not so doing.
- d) General or particular criteria, duly justified, to be used in valuing the assets and qualifying the liabilities of each of the companies involved in the merger process, and their method of application. Furthermore and if applicable, the ratio between the capital accounts and investment shares before the merger should be indicated.
- e) A list of special rights in the company or companies that will cease to exist as a result of the merger that have not been modified or subject to compensation, benefits agreed for shareholders or, if applicable, investment shares, as well as other individual privileges.
- f) Share exchanges, including charts showing the respective justification and method of calculation.
- g) Whether or not it is intended to keep the shares registered with the stock exchange or centralized trading mechanism, or to remove them, should also be communicated.

2.2. In cases of equity splitting, simple reorganization or other forms of business reorganization:

- a) Copy of the approved equity split or reorganization scheme.
- b) The date on which the agreement takes effect.
- c) The financial statements and all other economic and financial information used to justify the decision.
- d) Duly supported general or specific criteria to be used to value the equity block of the companies involved in the equity splitting process or reorganization and how they are to be applied.
- e) Type of equity split or reorganization, giving details of any special rights existing with in the company being split or ceasing to exist as a result of the split that will not be modified or compensated, as well as any rights agreed by the shareholders in the split company, any additional benefits or privileges and the criteria on which they are based, and the valuation of the company's equity.
- f) A detailed list, with values, of the assets and/or liabilities, if applicable, in each of the equity blocks resulting from the split or in the equity block to be transferred, as the case may be.
- g) List of share exchanges, including the respective justification and method of calculation.
- h) Whether or not it is intended to keep the shares registered with the stock exchange or centralized trading mechanism, now or in the future, or to remove them, should also be revealed.

2.3. In cases of capital increase or reduction, share consolidation or splitting, amortization or redemption of shares or modifications to the nominal value of the shares:

- a) When the capital is to be augmented and/or investment shares created through capitalization, the amounts and concepts giving rise to the change in capital and/or investment shares should be given, as well as the period corresponding to the capitalization and the new value of these

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accounts. Furthermore, the percentage of ordinary and/or investment shares to be released should be divulged, together with the rights inherent in such shares.

b) In cases of capital increase and/or creation of investment shares by cash contributions from shareholders or public share offerings, the amount of the increase should be revealed, together with the destination of the funds, the value to which the company's capital and/or investment share account will be raised, the rights inherent in these shares and their identifying characteristics. The characteristics and conditions of the subscription process should also be indicated, specifying the date of delivery of the subscription rights certificates (SRC), period of validity and negotiation of the SRCs in accordance with current legislation, the price of subscription and value of the premium, if any, the period for subscription and identifying characteristics of the temporary certificates.

c) If the company's capital and/or investment shares are to be reduced, the reasons for the reduction should be given, stating the number of shares to be removed from circulation or, if applicable, the reduction in their nominal value. The dates and methods by which the shares are to be withdrawn must also be indicated.

d) In the case of changes to the company's capital and/or investment shares for any other concept, the concept and value of the increase and/or reduction should be given, together with the new value of the company's capital and/or investment share account.

e) In the case of share splitting, consolidation or change in nominal value, details of the decision adopted should be provided, indicating the new number of shares, the old and new nominal value, the date of exchange or resealing, if applicable.

Information on mergers, equity splitting or reorganization and modification of the by-laws of an Issuer must be sent to the RPMV no later than fifteen (15) business days after inscription in the Public Registry, under the following terms:

i. For mergers, the resulting financial statements and public deed should be provided, together with information on the ratio between capital and investment share accounts, if applicable, after the merger and the date set for exchanging the shares of the merging companies.


ii. In the case of an equity split or reorganization the financial statements resulting from the split, simple reorganization or other form of business reorganization should be provided, together with the date set for exchanging the shares of the companies involved.

iii. For all modifications to the by-laws, copies of the corresponding public deeds should be provided.

3. Modification to the investment share account, giving details of the concept or causes of the modification and its value.

Directors and General Management

4. Appointment, resignation and changes to the members of the Board of directors and general management and/or equivalent bodies.

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5. Approval or modification of remuneration or incentives policy for the directors and senior management, including awards of shares in the issuer or companies in its economic group.

Control unit and non-arm's length parties


6. Transfers of shares by those who, directly or indirectly, hold ten percent (10%) or more of the Issuer's capital, or by those who obtain or cease to hold that percentage as a result of share purchases or sales.
7. Knowledge of plans that imply changes in the control unit or the acquisition or significant increase in the Issuer's shares, including agreements between shareholders.
8. Changes in the Issuer's control unit, in accordance with the provisions of the Regulations Concerning Indirect Ownership, Non-Arm's Length Relations and Economic Group of the SMV, including agreements between companies or between shareholders in the Issuer, either direct or indirect.
9. Transactions, loans and the granting of significant guarantees between the Issuer and companies in its economic group and/or with members of its own administration or shareholders.

Financial position and benefits

10. Approval and presentation of financial information and annual report, as well as modifications or corrections thereof. The respective financial information and annual report should be provided.
11. Appointment and termination of the contract with its audit firm.
12. Relevant changes in the results or in net equity, giving the reasons for such changes.
13. Approval of or modifications to the dividend policy, including the profit distribution criteria, such that an investor may estimate what dividends are payable and when. Any change in this policy must be reported at least 30 days before it takes effect.
14. Information on the distribution of dividends for the fiscal year, indicating the amount and fiscal year to which the payment applies and, if applicable, the dividend and/or percentage of shares released, whether ordinary and/or investment shares, the number of shares benefiting and the dates of registration and payment of any value or benefit.

Investment plans and financial structure

15. Approval of and changes to investment and financing plans and operations, as well as modifications to their terms and conditions.
16. Acquisition, disposal or restructuring of significant assets and/or liabilities, as well as encumbrances affecting the assets and capitalization of debt. Also reductions in net equity equal to or greater than 10%.
17. Granting, cancellation or opposition to trademarks, patents, licenses, permits for exploitation or other rights directly related to the Issuer's business.
18. Significant acquisitions and divestment of financial assets, as well as shares in other companies, the entering into of financial derivative contracts that may have a significant influence on the Issuer or its securities. Monthly position in financial derivatives.

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19. Postponement or non-compliance with payment obligations, including those deriving from debt securities, whether principal or interest, as well as any modification to the structure of rights or benefit payments and the consequences deriving from such situations.
20. Revocation or cancellation of lines of credit and the enforcement of guarantees.

Value propositions

21. Information on private or public securities issues, either domestically or abroad, including participation in American Deposit Receipt programs, giving details of publication of the offer and/or conditions of the issue and/or sale; as well as the results, including the number and total value of the securities placed or sold.
22. Ratings agencies' reports on the Issuer's securities, as well as changes, updates or objections, with a copy of the respective report.
23. Appointment, removal and change in the bondholders' representative.
24. Valuation reports drawn up by specialist companies, audit firms, banks, investment banks or others within the framework of a public offering of securities of due diligence.
25. Impairment of guarantees of payments to the holders of the Issuer's securities.
26. Registration, suspension or exclusion of the Issuer's securities by the regulatory authority of the stock exchange where the securities are registered.
27. Approval of plans or operations and repurchase, redemption, rescue, amortization, conversion or other operations to reduce the number of securities in circulation, as well as their exclusion from the RPMV.

Economic Activity


28. Significant contracts with the State, clients or suppliers, and renegotiation of such contracts.
29. The start of a process of due diligence or similar requested by a shareholder or by third parties, or ordered by the Issuer itself.
30. Discoveries of new resources or the development, acquisition or application of new technologies, that may have a significant impact on the Issuer's activities.
31. Strikes or unforeseen interruptions in production, that may have a significant effect.
32. Penalties imposed on the Issuer by the regulatory or supervisory authorities.
33. The start and results of legal proceedings, arbitration and administrative proceedings that may involve the events included in this list or other equivalent events in the Issuer's judgment and that may affect the equity or business and activities of the Issuer.
34. Bankruptcy proceedings affecting the Issuer.

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ANNEX II

In accordance with SMV ruling N° 005-012-SMV-01, the following information referring to UNACEM Corp, its businesses or one or more of the securities issued or guaranteed by it, shall be considered Privileged Information (this list is indicative but not exhaustive):

- 1) Changes in the issuer's decision or control unit.
- 2) Changes in the issuer's control agreements.
- 3) Mergers, acquisitions or other company reorganizations.
- 4) Changes in expected profits or losses.
- 5) Share packet transfers.
- 6) Changes in the members of the Board of directors or equivalent entities.
- 7) Qualified auditors' opinions.
- 8) New patents, licenses or registered trade marks.
- 9) Contracts with the government, clients or suppliers.
- 10) Non-compliance with payment of debt instruments.
- 11) Share repurchase or redemption plans.
- 12) Dividend payments or changes in dividend policy.
- 13) Risk rating reports on the company's securities and changes in the risk rating of any security.
- 14) Economic and financial restructuring, out-of-court liquidation or bankruptcy.
- 15) Purchase or disposal of assets or changes in their quality or value.
- 16) Significant legal disputes.
- 17) Revocation or cancellation of lines of credit.
- 18) Insolvency of significant debtors.
- 19) The financial statements of the Issuer.
- 20) Information on the supply and demand of securities issued by the Issuer into the market, including information on public offerings, purchase orders or sales to be made in or out of any centralized trading mechanisms.
- 21) Valuation reports drawn up by audit firms, banks, investment banks or consulting companies within the framework of a public offering or exclusion take-over bid.
- 22) Information on guarantees applicable to payments to bondholders.
- 23) Information on economic, legal and financial aspects of the Issuer or any company belonging to its economic group.
- 24) Information on the economic, social and political environment in which the Issuer and other companies of its economic group operate.
- 25) Information from government entities including, among others, reports on economic trends (production, employment, the exchange rate, interest rates, inflation, etc.) and economic policy decisions affecting the legal, economic and financial development of the Issuer.
- 26) Information on acquisitions or sales by an institutional investor on the stock exchange.
- 27) Information on equity, the exclusive purpose of which is to guarantee payments to the holders of equity-backed securities, as well as information on any mutual fund and/or investment fund.

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- 28) Information on any mutual fund including variations in the value of mutual fund units before they are known to the participants.