

Doing What's Right

Code of Ethics and Business Conduct



CEMEX

Building Our Future, Together

At Cemex, how we do business matters. Integrity, respect, and transparency are not just principles, they are the foundation of our culture and the way we operate every day. As our company grows and the world evolves, our values remain the anchor that guides us, shaping our relationships and defining the impact we have in every community we serve.

Our Code of Ethics is more than a set of rules: it is a shared commitment. It empowers us to act ethically, make the right decisions, and protect the trust we have built with each other and with the world around us. This Code applies to everyone who represents or interacts with Cemex, across every country, every role, every day.

This responsibility belongs to all of us. Living the Code means choosing to uphold it in every action and decision, and having the courage to speak up when something feels wrong. That is why we protect those who raise concerns in good faith, and those who engage in misconduct will face the proper consequences.

Together, we are building a future based on ethics, trust, and respect. Thank you for your commitment to doing what is right for our company, our people, and the communities we serve. This is our Code. Let's live it every day, everywhere, together.



Rogelio Zambrano
Chairman of the
Board of Directors



Jaime Muguiro
CEO

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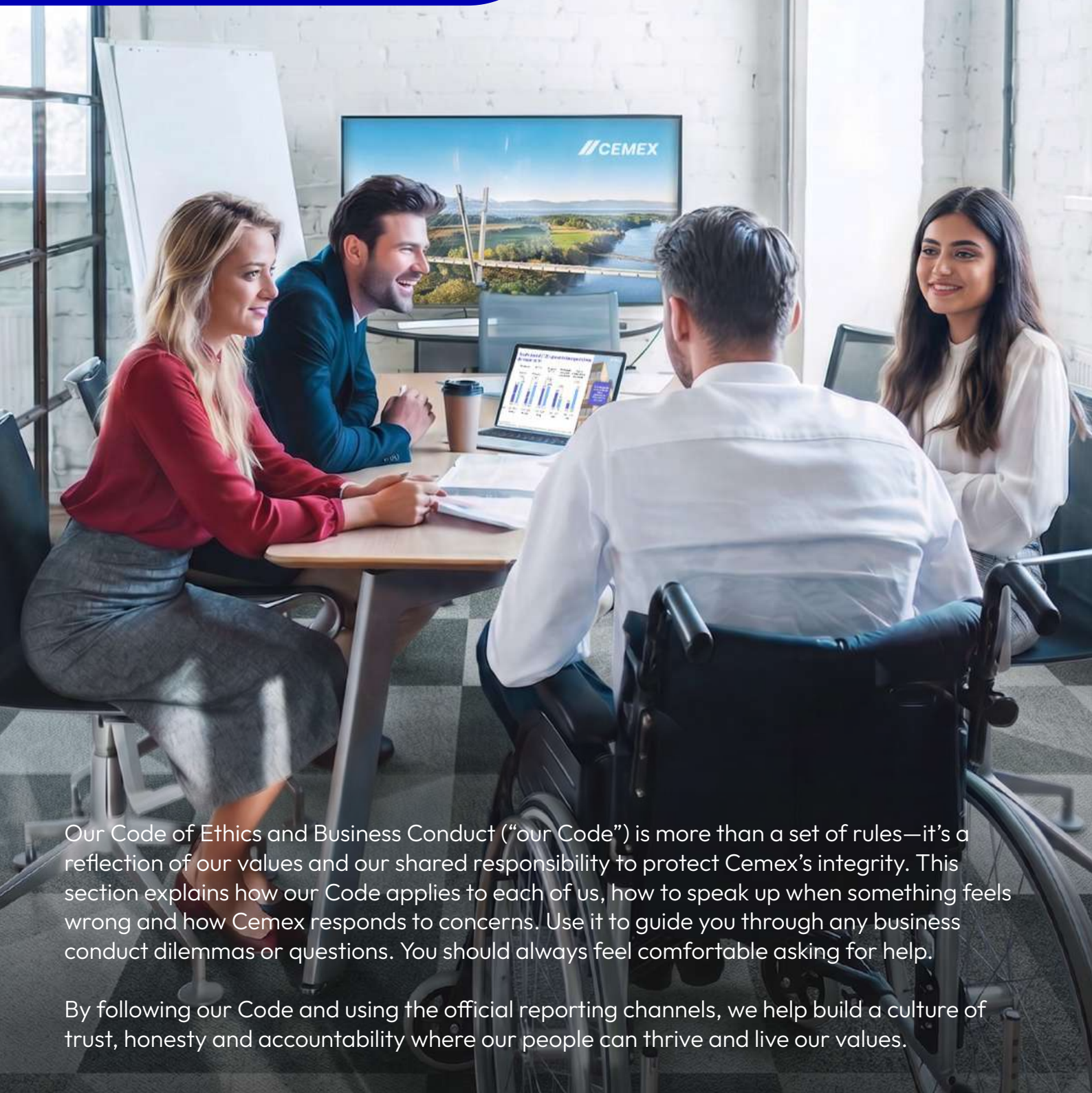
Commitment to our Code

Our Code and our role

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We speak up without fear

How Cemex responds to concerns



Our Code of Ethics and Business Conduct (“our Code”) is more than a set of rules—it’s a reflection of our values and our shared responsibility to protect Cemex’s integrity. This section explains how our Code applies to each of us, how to speak up when something feels wrong and how Cemex responds to concerns. Use it to guide you through any business conduct dilemmas or questions. You should always feel comfortable asking for help.

By following our Code and using the official reporting channels, we help build a culture of trust, honesty and accountability where our people can thrive and live our values.

Our Code and our role

At Cemex, doing the right thing is expected—even when no one is watching. Our Code guides our daily decisions and reflects who we are as a company.

It applies to everyone who represents Cemex, from employees to board members, and to how we engage with third parties we do business with (including, but not limited to, our customers, suppliers and contractors) and other stakeholders across all regions.

Our Code helps us to:

- Stay aligned with Cemex policies, values, internal controls, laws and regulations
- Make ethical decisions, even in unclear situations
- Speak up and find the right guidance when needed

Our Three Pillars: We Adhere. We Report. We Inspire.

Our commitment to doing the right thing is based on three simple pillars that guide how we work every day.

We Adhere

We follow the rules—the law and our company's Code of Ethics and Business Conduct and policies. This means making good choices, acting with integrity and keeping ourselves and Cemex on track.

We Report

When something feels off, we speak up. Reporting concerns and/or potential misconduct helps keep our workplace safe, fair and open. We protect each other, and we do not tolerate retaliation for raising a concern in good faith. When in doubt, we ask for guidance.

We Inspire

We lead with integrity. When we do the right thing, we encourage others to do the same. By supporting each other and speaking up for what's right, we help create a culture we can all feel good about.

Using these pillars as guidelines, we cultivate a company where everyone can do their best while staying true to our values.



We all share the responsibility to follow laws and regulations in every country where we operate, as well as all our global and local policies. Supervisors must understand the rules relevant to their teams and be prepared to guide their teams and manage risks.

By acting with integrity, we do more than just comply with our legal responsibilities—we protect Cemex's reputation, sustainability and long-term value. Each of us reflects the company's values.

What we say and do matters.

Throughout our Code, you'll find hyperlinks to relevant internal policies.

If a policy is mentioned, it also refers to any future policy that may replace the one cited.

Our values

Cemex's values shape how we work, deliver value, make decisions and treat one another. They define our culture and guide us as we build a stronger company. Here's what each value means to us:



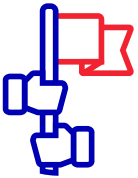
Ensure Health and Safety

Nothing comes before the health and safety of our people, contractors and community. We are committed to creating a safe and supportive environment where everyone goes home safely.



Focus on Customers

We listen to our customers, understand their challenges and provide valuable solutions efficiently and ethically. Building close and healthy customer relationships sets us apart from our competitors.



Act with Integrity

We do what's right, even when it's hard. We follow the law, we follow our policies and internal controls, we act ethically, we speak up about concerns and/or potential misconduct and we respect people and the planet.



Work as One Cemex

We leverage our knowledge, promote collaboration and share best practices across functions, roles and geographies to improve the way we work at Cemex.



Foster Innovation

We stay curious, search for new and smart ways to improve the future of our industry and embrace an entrepreneurial mindset by trying new solutions.



Embrace Diversity

We respect and value the differences among individuals, creating an inclusive and safe environment of support, respect and openness.

We speak up without fear

Maintaining an ethical workplace is everyone's responsibility. If something feels wrong—whether it's bullying, fraud or any potential failure to comply with any policy, law or regulation—speak up. Reporting concerns and/or potential misconduct helps protect our company, coworkers, community and reputation.

How to report

If you have a question or need to report a Code or policy violation, use one of these confidential reporting channels:

- Immediate supervisor
- [ETHOSline](#)
- Local ETHOS Committees
- Audit Committees
- Legal, Human Resources, Internal Audit or Internal Control Departments



ETHOSline

ETHOSline is Cemex's ethics and compliance hotline. Hosted by a third-party provider, it is available 24 hours a day and offers a free, secure and confidential way to report any matter, raise concerns or ask for guidance.



You may contact them toll-free by phone or email or through their website portal. Anonymous options are available, but providing your identity or a way of communicating with you can help us investigate more effectively and follow up with you if necessary.



Cemex will not attempt to identify anonymous reporters and will not tolerate retaliation for any good-faith reports that are submitted through any of the reporting channels.



Do What's Right



Q: I'm a supervisor, and someone came to me with a concern about fraud. I don't know how serious it is—what should I do?

A: As a supervisor, you're expected to take every concern seriously. Thank the person for speaking up, then encourage them to report it through ETHOSline and reassure them that no retaliation will occur. You may also report it yourself. Even if you're unsure, it's your responsibility to raise the concern so the right team can look into it.

Inspiring a culture of trust

- **Encourage honesty:** Every concern matters.
- **Protect privacy:** Reports are handled with confidentiality and transparency.
- **Support coworkers:** Speak up if you observe any misconduct or have any suspicions.
- **Lead by example:** Supervisors should foster openness and trust and provide guidance.
- **Be transparent:** Fully cooperate when responding to an investigation and/or audit.
- **Use reporting channels:** ETHOSline and our other official reporting channels listed above are always available.

How Cemex responds to concerns

All reports will be promptly reviewed and, if applicable, appropriate actions will be taken. Any report you make must be done in good faith—meaning you believe the information you are presenting is true or you suspect potential wrongdoing. Please provide as much detail and context as possible to support any next steps, including a possible investigation.



No Retaliation, No Fear

Cemex strictly prohibits retaliation against anyone who reports concerns in good faith or who participates in an investigation. Retaliation—including threats, exclusion or unfair treatment—creates fear and discourages honesty. If you experience or witness retaliation, report it immediately.

Disciplinary Action

Anyone found violating our Code, company policies, laws or regulations will be subject to disciplinary action.

Holding ourselves accountable helps protect Cemex and everyone we work with.

Do What's Right



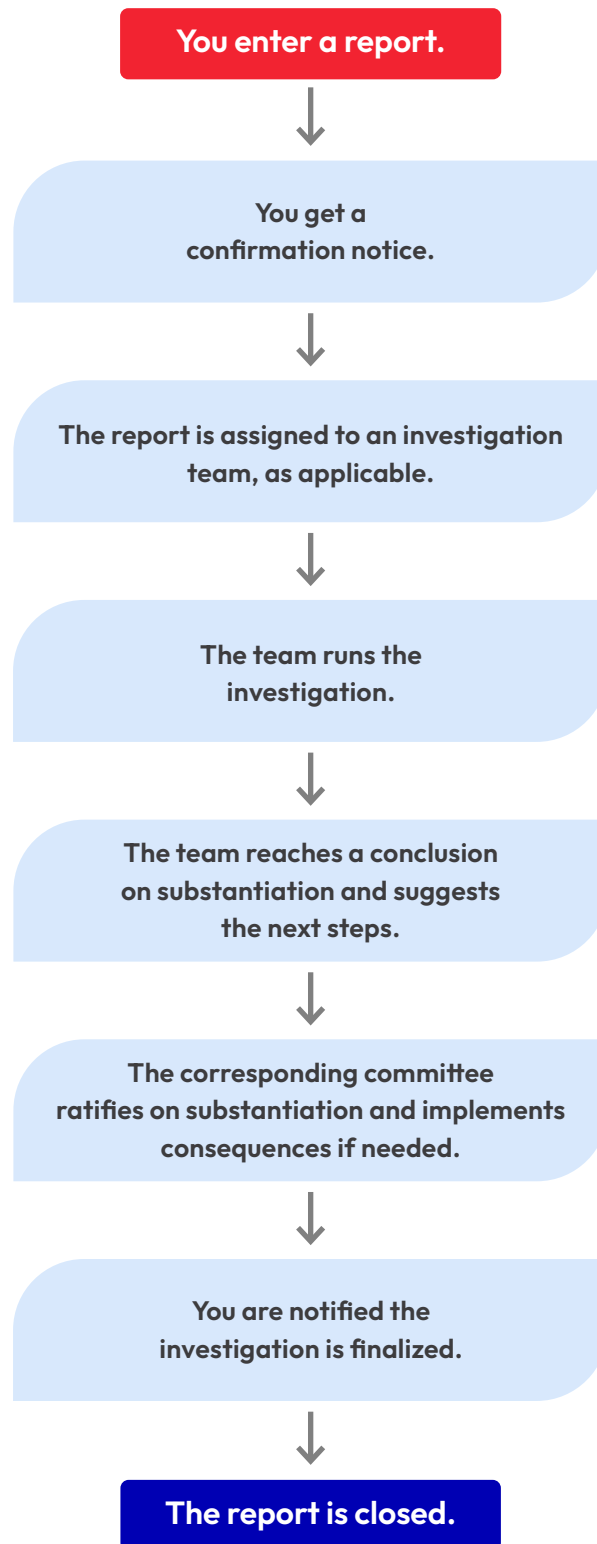
Q: I reported an instance of misconduct, and now my coworkers ignore me. Is this retaliation?

A: Yes. Retaliation isn't just from supervisors—it can come from coworkers too. Report any retaliation through ETHOSline or our other official channels, and reference your original report when doing so.

For more details, see:

- Global Workplace Non-Discrimination, Non-Harassment, Non-Bullying & Non-Retaliation Policy

Case Reception and Administration Process



Commitment to
each other

Commitment to each other

We keep our workplace safe

We maintain a respectful workplace

We support wellbeing

We respect human rights



We believe a strong workplace starts with respect, safety and support for all employees. This section outlines our commitment to a safe workplace, an inclusive culture, employee wellbeing and human rights. By working together, we create an environment where everyone can thrive and contribute to our shared success.

We keep our workplace safe

At Cemex, fostering everyone's health and safety is our top priority. We are committed to providing a workplace where each one of us feels secure, supported and protected from harm. A safe environment helps all of us focus, perform at our best and prevent accidents or injuries. Our commitment to health and safety is not limited to removing physical hazards—it includes maintaining a workplace free from substance abuse and violence.



Health and Safety Management System (HSMS)

Supervisors must encourage their teams and third parties to comply with our HSMS. We expect them to set a good example for all workers, giving workplace safety their highest commitment.

Do What's Right



Q: I'm working on a site where some experienced coworkers don't always wear all their required personal protective equipment (PPE), saying they "know what they're doing." I feel awkward speaking up. What should I do?

A: Even experienced workers can be at risk if they don't wear PPE. If you feel comfortable, you can ask them respectfully about it—sometimes a simple question can spark a needed reminder. If the behavior continues, or if you're unsure about approaching them, speak to a supervisor or report the concern. Safety is everyone's responsibility, and raising an issue is about protecting your team, not policing it.

For more details, see:

- Health and Safety Policy
- Workplace Violence Policy

Staying safe

- **Follow safety procedures:** Always use personal protective equipment, report hazards and comply with all health and safety policies and procedures.
- **Stay alert and unimpaired:** Do not work under the influence of drugs or alcohol, or of strong medications that impair you. If local laws, regulations or business unit policies have stricter guidelines regarding drug or alcohol abuse, we follow those.
- **Prevent workplace violence:** Threats, intimidation, physical harm and any forms of violence, including inflicting psychological distress, are not tolerated. Report any concerns immediately.
- **Speak up about safety risks:** If you see unsafe conditions or behaviors, report them to your supervisor or the appropriate safety contact.
- **Respect others' wellbeing:** Support a culture where safety is everyone's responsibility.

We maintain a respectful workplace

At Cemex, we do more than manufacture construction materials—we build a culture where everyone feels safe, included and valued. Hiring, promotions and pay are based on merit-based criteria, including, but not limited to, performance, skills and experience. We prohibit discrimination, harassment and bullying of any kind. A respectful, safe and welcoming workplace helps us all succeed.



Strength in diversity

A fair, diverse workplace that values different perspectives fosters teamwork and innovation. Acts of discrimination, harassment and bullying harm individuals and weaken our culture. By standing against such conduct, we uphold our company's values.

Building an inclusive workplace

- **Treat everyone fairly:** Make decisions based on merit, not personal traits.
- **Respect others:** Treat everyone with dignity. Avoid offensive jokes or disrespectful comments.
- **Exercise thoughtfulness:** Think about how your words and actions affect others.
- **Speak up about disrespectful actions:** Report discrimination, harassment, bullying or misconduct.
- **Establish an inclusive environment:** Everyone should be free to respectfully express opinions without fear.
- **Use reporting channels:** ETHOSline and other official reporting channels are always available.

Key workplace concepts

- **Fairness** – Basing decisions about hiring, promotions and pay mainly on candidates' merit.
- **Respect** – Valuing differences and treating others professionally.
- **Equity** – Encouraging a fair shot to succeed for everyone in our meritocracy.
- **Harassment** – Using words or actions, such as threats or insults, that target personal traits protected from discrimination and create a hostile environment.
- **Bullying** – Mistreating others through intimidation, humiliation or mobbing.
- **Sexual Harassment** – Making sexual comments or engaging in conduct, such as unwanted advances or other actions, without the recipient's consent or that causes them discomfort.

**Commitment to
each other**

**What personal traits are
protected from discrimination?**

- Gender (including gender identity and expression)
- Race or ethnicity
- Color
- Religion
- Disability (physical or mental)
- National origin
- Genetic information
- Family responsibilities
- Pregnancy
- Breastfeeding
- Age
- Sexual orientation
- Marital status
- Protected veteran status
- Citizenship status
- Any other trait protected by law

Remote work and our Code

Respect and professionalism apply everywhere—whether we are in the office, at a job site or interacting remotely. The same rules apply to virtual meetings, emails, chat messages and other digital communication. Discrimination, harassment and bullying are never acceptable.

Do What's Right


Q: My supervisor makes inappropriate comments about coworkers' appearances. The speech is not directed at me, but it makes me uncomfortable. Should I report it?

A: Yes. Even indirect comments create a negative environment. If you feel comfortable, address it with your supervisor first, but seek additional help if needed. Speaking up protects everyone and strengthens our culture of respect.

For more details, see:

- Global Workplace Diversity, Equity & Inclusion Policy
- Global Workplace Non-Discrimination, Non-Harassment, Non-Bullying & Non-Retaliation Policy

We support wellbeing

We believe that fostering personal wellbeing is essential to creating and maintaining a healthy, productive workplace. Cemex supports this through our Cemex Wellbeing Model, which can help employees balance work life and personal life by providing resources to enhance their mental and physical health, financial wellness and overall work experience.



Promoting wellbeing

To promote wellbeing, we:

- **Prioritize mental health:** Help foster a culture where mental health is valued and employees feel supported.
- **Encourage balance:** Work should not come at the cost of personal wellbeing. We respect employees' time and promote work-life balance.
- **Offer support resources:** Access to local wellbeing programs, support lines and other assistance programs is available.

Do What's Right

Q: I feel overwhelmed with work. But I'm afraid if I say something, it will be held against me. What should I do?

A: Your wellbeing matters. Cemex offers wellbeing programs as well as local support lines. You can also talk to your supervisor or HR about available resources. Prioritizing mental health helps us all maintain a healthy work-life balance.

The Cemex Wellbeing Model

Our Wellbeing Model focuses on four key areas:

- **Emotional health** – Access to mental health support and stress management tools
- **Physical health** – Encouraging healthy habits and providing medical resources
- **Financial wellness** – Tools and guidance for financial stability
- **Workforce experience** – Creating a positive, supportive work environment

This model helps employees stay healthy, both at work and beyond.

We respect human rights

Cemex is committed to upholding human rights across all our operations and supply chains. We follow internationally recognized human rights standards and comply with labor laws that protect workers. We expect employees, suppliers, clients and third parties to share this commitment.

Protecting human rights

- **Prohibit child labor:** Cemex has zero tolerance towards child labor in any part of our operations or supply chain.
- **Reject modern slavery:** Never tolerate forced labor, human trafficking, any form of modern slavery or the use of any products or services that use slavery.
- **Follow labor laws:** Be sure to comply with applicable labor laws and regulations, including those related to wages, hours and safe and healthy working conditions.
- **Respect freedom of association:** Workers have the right to join or not join labor unions, bargain collectively and engage in lawful activities without fear of retaliation.
- **Commit to a clean, healthy and sustainable environment:** Support practices that protect air, water and land and that reduce environmental harm in line with Cemex's sustainability goals.
- **Respect communities:** Listen to and engage with local communities respectfully, minimizing negative impacts and promoting mutual benefit.
- **Hold suppliers accountable:** Ensure our suppliers meet Cemex's standards for human rights and fair labor practices.

What are internationally recognized human rights standards?

They include, but are not limited to:

- The United Nations (UN) Guiding Principles on Business and Human Rights
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- The International Bill of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- Any resolutions or guidelines issued by international organizations regarding the human right to a clean, healthy and sustainable environment

Responsible Sourcing

To make our products, we must rely on complex supply chains, including quarrying, raw material transport and subcontracted labor—areas where human rights can be at risk. At Cemex, we work hard to keep everyone in our supply chain safe and treated fairly.

- We expect suppliers to provide their workers with safe conditions and fair pay.
- We encourage and engage with suppliers to improve safety, training and working conditions as required.
- We avoid working with any supplier that allows unsafe or unfair treatment.

Everyone at Cemex has a role to play in making sure human rights in our supply chain are respected and protected.

Do What's Right



Q: I visited a supplier's facility and noticed some workers look unusually young. They also seemed hesitant to speak, and a coworker mentioned concerns about working conditions. I don't have proof the supplier is doing anything illegal, but I feel uneasy. What should I do?

A: Report your concerns to your supervisor or through any of Cemex's official channels. You don't need proof to speak up—Cemex takes human rights seriously and will investigate. If a supplier isn't meeting our standards, we may work with them on corrective actions or reevaluate our business relationship.

For more details, see:

- Global Human Rights Policy

Commitment to our communities

We deal fairly with our customers
We choose our suppliers carefully
We support our communities
We prohibit bribery
We prevent money laundering
We compete fairly
We work ethically with the government
We abide by international trade laws
We prohibit insider trading
We engage in politics responsibly
We protect our environment



Cemex strives to act fairly, honestly and responsibly with everyone we work and interact with. This includes customers, suppliers, governments and local communities. Our choices affect people and the planet, so we must always follow the law and company policies.

This section explains how we maintain trust, follow fair business practices and reduce risk. It also covers how we handle trade, prevent corruption and protect the environment. By doing the right thing, we support strong, safe and lasting communities.

We deal fairly with our customers

Cemex aims to be the best option for our customers by doing business fairly, professionally and with integrity. We do not discriminate against customers or markets, and we expect our customers to follow ethical standards and the law.



Upholding fair business practices

- **Lead with honesty and clarity:** Be sure to market our products truthfully. We do not make false claims about quality, availability, delivery or payment terms.
- **Honor commitments:** Agree to only the terms that we can deliver. If something changes, you must tell your supervisor and the customer.
- **Ensure product quality:** Follow our strict standards to provide high-quality products and services.
- **Speak up:** If you learn that a third party is acting unlawfully or unethically, report it through any of our official reporting channels.
- **Respect local customs:** Treat customers with professionalism and with respect for local customs and traditions.

Our commitment to product quality

Cemex follows strict quality standards in all operations. We work to improve our products and meet customer needs. High quality maintains trust and shows our commitment to excellence.

Do What's Right



Q: A customer asks me to exaggerate a product's benefits to close a deal. They say it's common practice and won't be questioned. What should I do?

A: Never make misleading claims to customers. Honest marketing maintains trust and protects Cemex's reputation. If you exaggerate any benefits, it may even have legal repercussions. Politely refuse the request and explain that Cemex does business honestly. If you feel pressured, talk to your supervisor.

We choose our suppliers carefully

Cemex builds strong relationships with suppliers and third parties based on trust, respect and shared values. Suppliers play a key role in delivering quality products and services to our customers. We require them to follow ethical business practices and comply with applicable laws and regulations.



Our due diligence process

To keep our supply chain ethical and secure, we:

- **Review suppliers:** We review business practices and legal and financial documentation in alignment with Cemex's policies.
- **Require formal legal agreements:** Agreements must include clear terms and adhere to company policies.
- **Encourage compliance:** We monitor supplier performance and address any concerns.

This process helps us build strong business relationships that support our success.

Do What's Right



Q: I'm trying to work with a new supplier, but they won't provide some of the paperwork we asked for. They say it's not necessary. What should I do?

A: Don't move forward without the proper documents. All suppliers must meet Cemex's standards and show that they follow the law. If a supplier won't share the needed paperwork, talk to your supervisor or the Compliance team. Skipping this step could put Cemex—and you—at risk for a violation of the law or our policies.

For more details, see:

- Code of Conduct When Doing Business with Us
- Global Policy for Third Parties

Seeking ethical collaboration

- **Engage responsible suppliers:** Work with suppliers who share our commitment to integrity and legal compliance.
- **Complete due diligence:** Review suppliers before commencing a business relationship with them to confirm that they meet our ethical, legal and sustainability standards.
- **Avoid conflicts of interest:** We strive to work with suppliers where our employees have no actual, potential or perceived conflict of interest.
- **Support sustainability:** Look for suppliers who promote social responsibility and work to protect the environment.
- **Celebrate excellence:** Recognize suppliers who bring innovative ideas and high-quality services.

We support our communities

Cemex strives to help communities grow and thrive. We listen to local needs and work on projects that create real benefits. Our goal is to support economic, social and environmental progress while letting communities lead their own development.



Making a difference

- **Engage openly:** Meet with communities to listen, share ideas and work together.
- **Follow the rules:** Support only those programs that comply with applicable laws and local authorities, and get approval from local senior leadership.
- **Support responsibly:** All donations must follow Cemex policies and the law, be properly registered and be handled with honesty and transparency.
- **Respect community roles:** Cemex does not take over responsibilities that belong to others, including government entities, organizations or communities.
- **Leverage local talent:** Hire qualified local workers and suppliers based on merits and performance.

Volunteering at Cemex

Through the company's employee volunteer initiative, UNITE: Volunteering as One Cemex, employees can use work hours to help local and global communities. Volunteering allows us to give back, build relationships and grow. All activities must align with Cemex's business commitments.

Do What's Right



Q: A community leader asked me to promise Cemex's support for a local event. I think it's a great cause. Can I agree?

A: No. You cannot make commitments on behalf of Cemex. All community involvement, including donations, must follow company rules and get approval. If you are unsure, ask your local HR or through any of our official channels.

For more details, see:

- Global Policy on Budget Authorization, Accounting and Management Procedures of Donations
- Global Policy on Authorization and Accounting of Operating Contributions

We prohibit bribery

Cemex has a zero-tolerance policy for bribery and corruption. We do not offer, promise or give anything of value to a Politically Exposed Person (PEP) or any third party in violation of the law to gain an unfair advantage or influence a decision. We also do not accept or request anything of value that could improperly affect our business decisions.

Preventing bribery risks

- **Follow Cemex policies:** Only give gifts, hospitalities or donations if they follow company policies and approval processes.
- **Conduct due diligence:** Before working with third parties, ensure they complete the required third party due diligence.
- **Get proper approvals:** Obtain written approval according to internal policies and processes before making lawful payments to or reimbursing a PEP.
- **Keep accurate records:** Maintain clear, truthful financial records. All payments must be supported with receipts or invoices.
- **Report red flags:** If something seems improper, stop the transaction right away and report your concerns to Compliance.

What is “anything of value”?

Bribery isn't just about cash. Anything of value can include, among other things:

- Gifts, gift cards or hospitalities
- Meals, travel or entertainment
- Donations or sponsorships
- Favors, discounts or job offers

Even small items can be a bribe if they are meant to influence a decision. Always follow Cemex's policies before offering or accepting anything of value.



Who is a Politically Exposed Person (PEP)?

A PEP is someone in a government, political or international role who may influence business decisions. This includes, but is not limited to:

- **Government employees** at any level, including workers at state-owned enterprises
- **Political figures**, such as candidates or members of political parties
- **Officials of international organizations**, like the United Nations or World Bank
- **Family members** and close associates of the persons mentioned above

Because PEPs have power or influence, working with them carries a higher risk of bribery or corruption. Always follow Cemex's PEP-related rules when dealing with them.

Commitment to our communities



Recognizing bribery risks

Bribery can happen in many ways. Be aware of red flags, including:

- A **political candidate** requesting a contribution to a campaign or cause
- A **local official** demanding cash to approve a contract or permit
- A **government customer** seeking reimbursement for personal expenses
- A **third party** offering a bribe on behalf of Cemex
- A **PEP** requesting a lavish gift or expensive meal in exchange for business

If you notice any of these or other warning signs, report them immediately to Legal or Compliance.

Do What's Right



Q: A supplier tells me they have close ties to a PEP who can speed up a construction permit for Cemex. They say it's standard in the industry to offer a small "consulting fee" to the PEP to make the process easier. I know delays can be costly, and the supplier assures me this is legal in the country. What should I do?

A: Do not proceed. This is a red flag for bribery. Offering anything of value, directly or indirectly, to influence a PEP's decision is against Cemex's policies and could violate anti-corruption laws. Report the situation to Legal or Compliance immediately. Even if local laws allow it, Cemex holds itself to high ethical standards and does not tolerate corruption.

For more details, see:

- Global Anti-Corruption Policy
- Global Policy on Authorization and Accounting of Corporate Hospitalities to Government Officials

We prevent money laundering

Cemex operates globally, and we must comply with anti-money laundering laws everywhere we do business. Money laundering is the process of hiding money gained from illegal activities, such as drug trafficking, terrorism or corruption, to make it look legitimate. If we facilitate or fail to prevent money laundering, Cemex could face serious legal and financial consequences, including fines, loss of business and reputational damage.

Mitigating money laundering risks

- **Follow payment rules:** Accept only those payments that comply with Cemex's approved limits and payment methods.
- **Verify third parties:** Before working with any third party, confirm their identity and source of funds.
- **Report suspicious activity:** If something seems unusual, stop the transaction and promptly report it.
- **Keep accurate records:** Document all payments and transactions clearly.
- **Reject cash payments exceeding applicable thresholds:** Cash transactions that exceed the corresponding thresholds are a red flag for money laundering.

Warning signs of money laundering

Be alert for these red flags:

- Requests to use currencies not listed in the agreement
- Payments to or from countries unrelated to the transaction
- Large cash payments or unusual payment terms
- Involvement of third parties with no clear role in the deal or transaction
- Refusal to provide identification or financial details
- Complex ownership structures that hide the beneficial owner
- Lack of concern for fees, taxes or costs

If you notice any of these or other similar warning signs, report them immediately through any of our official channels.



Do What's Right



Q: A new supplier requests to be paid in a currency not listed in the contract. They also want the payment sent to a bank account in a country with no connection to the transaction. They assure me it's for "tax reasons." What should I do?

A: This is a red flag. Payments should be made following Cemex's internal policies. Report the request to Legal or Compliance before proceeding. Ignoring these signs could expose Cemex to serious legal and financial risks.

For more details, see:

- Global Anti-Money Laundering Policy

We compete fairly

Cemex strives to compete honestly and legally in every market in which we operate. We follow antitrust and competition laws, which protect fair markets and prevent unfair business practices. These laws are complex and vary by country. Violating them can lead to serious legal penalties for Cemex and criminal charges for individuals.

Encouraging fair competition

- **Follow antitrust laws:** When interacting with competitors, never discuss or make formal or informal agreements about any efforts to limit fair competition, such as engaging in price fixing or bid rigging.
- **Gather competitor information legally:** Use only public and approved sources for market research.
- **Exercise caution with competitors:** Keep contact limited, professional and business related.
- **Check sales practices:** Get Legal's approval before offering discounts, promotions or exclusivity agreements.
- **Ask before acting:** If unsure about a decision, ask Legal before moving forward.

Red flags in fair competition

Watch out for situations that may violate antitrust laws, such as:

- A competitor
 - Suggests setting prices together
 - Discusses future prices, discounts or sales strategies
 - Pressures you to keep another company out of the market
- A supplier or distributor asks for an exclusive deal that could harm competition

If you see these warning signs or other similar ones, stop the conversation and promptly report it to Legal.

When to seek legal guidance

Ask Legal for advice if you:

- Work with a competitor in any way
- Determine prices, discounts or sales conditions as one of your job functions
- Cannot explain a business decision with a clear, legal reason



Do What's Right



Q: While I am at a trade association meeting with competitors, someone casually mentions future prices in our industry. I don't join the discussion, but I hear it. What should I do?

A: Leave the conversation and report it to Legal. Being present for discussions about pricing can create legal risks. Never discuss pricing, discounts, sales strategies or customers with competitors.

For more details, see:

- Global Antitrust Compliance Policy

We work ethically with the government

Cemex follows strict ethical and legal standards when dealing with government entities and PEPs, who may act as regulators, customers, suppliers or stakeholders. We must follow Cemex's policies and applicable laws in all interactions.

Doing business with the government is different from engaging in private sector transactions. Rules on bribery are especially strict. Employees must ensure that all agreements, payments and contributions follow Cemex's rules and legal standards.

When interacting with government representatives, we must be honest, respectful and cooperative. Any requests they make for Cemex documents or information must be coordinated through the Legal and Public Affairs teams.

How we ensure ethical government interactions

- **Follow Cemex policies:** Rules apply to business or exchanges of gifts or hospitalities with government entities.
- **Identify government business:** If a customer, supplier or shareholder has government ties, treat the deal as government business.
- **Treat all shareholders according to the type of shares they hold:** Government shareholders in any Cemex company will be treated like all other shareholders.
- **Behave professionally with PEPs:** Always act honestly, transparently, legally and with integrity.
- **Get approval before commitments:** Never agree to payments, gifts, hospitalities, donations or contributions involving a government entity or PEP without proper approval.

Expected behaviors when dealing with PEPs

When interacting with a PEP:

- **Be transparent:** Follow Cemex's policies in all discussions.
- **Keep records:** Document meetings, decisions and approvals.
- **Avoid gifts or favors:** Do not offer or accept anything that could be seen as improper.
- **Stop and report concerns:** If a PEP asks for something that seems wrong, decline and promptly report it to Legal or Compliance.



Do What's Right



Q: A company wants to buy materials from Cemex, but I learn that a government entity owns part of it. The company claims it is a private deal and says extra steps are not needed. What should I do?

A: Treat this as government business. If a company has any government ownership, follow Cemex's rules and ask Legal before moving forward.

For more details, see:

- Global Anti-Corruption Policy
- Global Policy on Authorization and Accounting of Corporate Hospitalities to Government Officials
- Global Policy on Authorization and Accounting of Operating Contributions

We abide by international trade laws

As a company with worldwide operations, we must comply with the trade laws of multiple countries, including sanctions programs, export controls and anti-boycott rules. How applicable the country's laws are depends on the nature of the transaction or activity. Because trade laws differ by country and change often, we must stay informed. Violations can lead to serious legal, financial and reputational harm for Cemex and its employees.

Complying with trade laws

- **Understand sanctions programs:** Cemex may not carry out transactions with entities connected to sanctioned or restricted countries, individuals or companies, without Compliance's written approval.
- **Follow export controls:** Before shipping or exporting goods, check with the corresponding local authority to determine if a license or government authorization is required due to the destination country or recipient of the goods.
- **Avoid illegal boycotts:** Never support or participate in boycotts, and never agree to sign any document that includes boycott-related language.
- **Ask before acting:** If unsure about a trade issue, get Compliance's approval before moving forward.
- **Report concerns immediately:** If something seems wrong or suspicious, stop the activity or transaction and promptly report it to Compliance.

How to prevent sanctions violations

To comply with sanctions programs, we:

- **Screen third parties** (including their owners and directors) to ensure they are not listed on any sanctions or restricted party lists.
- **Verify both the country of origin and the country of destination** for goods and services to ensure they are neither sourced from nor delivered to sanctioned countries.
- **Do not attempt to circumvent sanctions** by using intermediaries or third parties.
- **Speak up** if someone pressures us to ignore sanctions programs or export control regulations.

For more details, see:

- Global Sanctions, Export Controls and Anti-Boycott Compliance Policy



Do What's Right



Q: A supplier offers a great price on materials, but they originate from a sanctioned country. The supplier suggests using a third-party distributor to get around the restrictions. What should I do?

A: Do not proceed. This is a clear attempt to bypass sanctions, which is illegal. Report the situation to Compliance immediately. Cemex does not tolerate engaging in trade that violates applicable sanctions programs.

We prohibit insider trading

Insider trading happens when someone buys or sells a company's securities, such as shares, based on material nonpublic information about that company, or shares that information with others who use it to trade. It is illegal in many countries and is prohibited under our policies. For anyone in possession of inside information, the prohibition is in effect until that information has been properly made public long enough for the market to process such information.

What is material nonpublic information?

Material nonpublic information refers to confidential details about a company that could influence someone's decision to buy or sell its stock. Information is considered "material" if a reasonable investor would see it as either important or likely to at any time affect prices or volumes of shares, debt securities and the like. It's "nonpublic" if it hasn't been shared in a way that gives all investors equal access—such as through an official press release, public filing or official presentation. Even once disclosed, the information may still be treated as nonpublic until enough time has passed for the market to process such information.

Examples include:

- Financial results that haven't been released
- Planned mergers or acquisitions
- Executive changes
- Major business deals or new product launches

Understanding quiet periods

During quiet periods (also called blackout periods), employees cannot trade Cemex securities.

What happens if you breach insider trading laws?

Insider trading is a serious crime in many countries.

Consequences may include, among others:

- **Fines and penalties** from financial regulators
- **Criminal charges**, including prison time
- **Job loss** and damage to your reputation

If you are unsure about a trade, don't take the risk—ask Legal or Compliance first.

Do What's Right



Q: I learned Cemex is about to announce a major business deal. The news will likely increase the stock price. I told my brother to buy shares, but I didn't trade any myself. Did I do something wrong?

A: Yes. This is called tipping and is a form of insider trading. Even if you don't trade, sharing nonpublic material information is prohibited. Report any concerns to Legal or Compliance immediately.

Preventing insider trading

- **Do not trade on inside information:** Never buy or sell securities while having nonpublic material information.
- **Do not 'tip off' others:** Never share material nonpublic information with family, friends or anyone else—even if you don't trade.
- **Respect quiet periods:** If a quiet period is in effect, you are not allowed to trade Cemex securities.
- **Ask before acting:** If you are unsure, check with Legal or Compliance before making a trade.

For more details, see:

- Insider Trading and Transactions with Cemex Securities Policy

We engage in politics responsibly

Cemex respects everyone's right to take part in politics, but all political activity must follow company policies and applicable laws. And you must ensure that your personal political actions are not linked to Cemex in any way.



Engaging in politics responsibly

- **Follow the law:** Your political involvement must be legal in your country and follow Cemex's policies.
- **Keep work and politics separate:** Do not take part in political activities at work, on company time or using company resources.
- **Comply with the rules for corporate contributions:** Cemex can make political contributions only if local law allows and the donations have been authorized in accordance with Cemex policies.
- **Never speak for Cemex:** If you express political opinions to others, make it clear you are speaking for yourself and not for Cemex.

Do What's Right



Q: I support a political candidate and want to help with their campaign. Can I do this?

A: Yes, but only on your own time and using your own resources. Do not use Cemex email, money or equipment for political activities. Make sure your support is personal and does not look like it comes from Cemex.

For more details, see:

- Global Anti-Corruption Policy

Political contributions

Cemex can make political contributions only if:

- They are legal in the country.
- Legal approves them first.
- They have been made in compliance with Cemex's guidelines and approval process.

Political contributions that do not meet these rules are not allowed.

We protect our environment

Cemex is committed to protecting the environment and supporting sustainability across all our operations. We aim to reduce our impact on air, land and water, while helping to build a more sustainable future for our communities and the planet.



Caring for the environment

- **Control emissions:** We monitor and control air emissions arising from our operations.
- **Protect nature:** We manage land use and protect biodiversity in and around our sites.
- **Reduce disruptions:** We work to limit noise, vibration and traffic that may affect nearby communities.
- **Save water and reduce waste:** We minimize the use of water and aim to reduce, reuse and recycle materials.
- **Use alternative fuels:** We follow strict guidelines when handling and introducing alternative fuels in our operations.

We also:

- Train our teams to follow safe and sustainable practices.
- Use our Environmental Management System (EMS) to manage risks, respond to issues and engage with communities.
- Hold supervisors accountable for setting clear roles, tracking progress and improving performance.

Be ready to act

If you see something that could harm the environment:

- **Report it right away** through ETHOSline or any other official reporting channel.
- **Support our EMS procedures** to prevent and respond to risks.

Everyone plays a role in protecting our environment.

Do What's Right



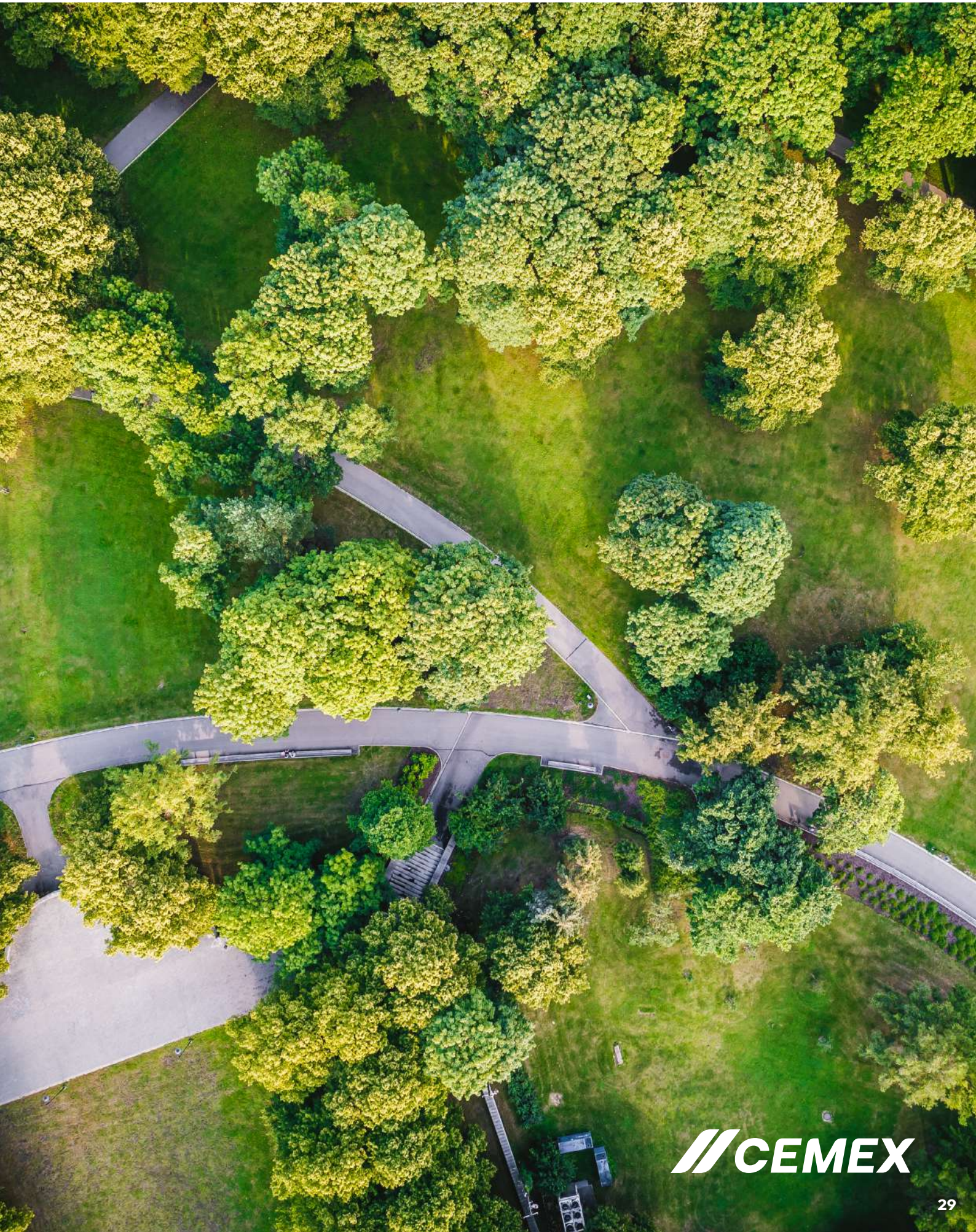
Q: I noticed a lot of dust coming from a Cemex plant. It seems to be a higher amount than usual. Should I report it even if I'm not sure it's a problem?

A: Yes. If something seems off, report it. It's always better to raise the concern so it can be checked and addressed quickly. Protecting the environment is everyone's responsibility.

For more details, see:

- Environmental Policy
- Biodiversity Policy
- Water Policy

Commitment to
our communities



Commitment to Cemex

We manage conflicts of interest
We exchange gifts and hospitalities responsibly
We protect Cemex's assets
We prohibit fraud
We manage crisis operations carefully
We protect intellectual property
We keep data secure and private
We maintain confidentiality
We keep accurate records
We communicate appropriately



What we do—and how we do it—both matter. This section explains how we protect our company by using good judgment, following policies and acting with integrity every day.

We are all responsible for keeping Cemex transparent. That means protecting company resources, managing risks, keeping clear records and speaking carefully. By doing the right thing in our work, we help maintain trust and protect Cemex's future.

We manage conflicts of interest

At Cemex, we are all required to make decisions in the company's best interest. A conflict of interest exists when personal relationships or outside interests interfere with our job-related duties or decisions—or even appear to do so.

Because conflicts can harm Cemex's reputation and break trust, we must promptly disclose them so they can be managed carefully.

Avoiding conflicts of interest

- **Use all tools and platforms made available to report conflicts of interest:** Employees must disclose any actual or potential conflicts. Not disclosing a conflict may violate our Code. Even if you do not have any actual or potential conflicts of interest, it is Cemex's policy that you disclose you have nothing to report.
- **Keep your information updated at all times:** Make sure to update your information whenever your role or personal situation changes. You must complete any conflict-of-interest report, form or information, even if you have nothing to report.
- **Avoid influence over family or friends:** You must not supervise, directly or indirectly, those with whom you have significant relationships. The general guideline is to avoid these reporting relationships, particularly if they are within one or two levels of your own. Under all circumstances, it is prohibited to assess or influence compensation or career-related changes for relatives or those with whom you have a significant relationship.
- **Watch out for third party conflicts:** If a relative or significant relationship owns or works for a Cemex customer or supplier, do not take part in business decisions involving that company.
- **Step back from hiring:** You may refer a relative or significant relationship for a role, but you must stay out of the hiring and evaluation process.
- **Don't let outside work get in the way:** Having a second job, a business interest in suppliers or customers, or other outside activities that could interfere must be declared and approved accordingly and not interfere with your Cemex responsibilities.



Types of conflicts of interest

Here are four common types of conflicts:

- **Internal relationships:** You oversee a relative or significant relationship at work, or are involved in their hiring, pay or promotion.
- **Third party relationships:** You have a personal connection to a customer, supplier or contractor and are involved in business with them.
- **Outside interests:** You run or support a business that competes with or does business with Cemex.
- **Business interests:** You or someone close to you owns a stake in a company that either works with Cemex or stands to gain from a Cemex decision.

Always disclose any of these kinds of situations through the tools and platforms made available by Cemex so that the involved areas, such as Legal, HR, Internal Control and any other corresponding approvers, can review and manage them properly.

We manage conflicts of interest



Who counts as a relative?

“Relatives” include your:

- Spouse or partner
- Parents, children, siblings and their spouses, stepparents or stepchildren
- In-laws, grandparents or grandchildren
- Uncles, aunts, nephews or nieces
- First cousins
- Any relative who lives in your household

What is considered a “significant relationship”?

“Significant relationships” include:

- People you have a personal or romantic relationship with
- Close friends of your family or partner
- Anyone you live with or share finances with

Even when there is no bad intent, these relationships can create the perception of bias, so they must be disclosed.

Do What’s Right



Q: I recently got promoted, and now I supervise someone who’s dating my brother. We’ve never disclosed the relationship. Should I disclose it now?

A: Yes. Even if it started before your promotion, you must disclose it through the tools and platforms made available by Cemex. Not disclosing it would be a violation of Cemex’s Code.

For more details, see:

- Cemex Policy on Conflicts of Interest

We exchange gifts and hospitalities responsibly

At Cemex, we believe in respectful business relationships, which may include exchanging gifts in some situations. “Gifts” include not just physical items, but also *hospitalities* such as meals, entertainment, tickets to events, travel, invitations to recreational activities or favors.

All gifts must be handled carefully to avoid misunderstandings or the appearance of preferential treatment. We may give or receive a gift only when it is allowed by the applicable laws and Cemex’s policies, when it is for a valid business reason and when it is not perceived as influencing a decision. This includes gifts to or from suppliers, customers, contractors, government-related individuals such as PEPs, or any other third party.

Exchanging gifts responsibly

- **Always follow Cemex’s policies:** Offering and/or receiving gifts may require written approval, especially those over a certain value or involving PEPs.
- **Observe value limits when giving gifts:** There are two value limits that apply to gifts that Cemex employees may provide to third parties:

Type of Third Party	Value Limit
Government official, PEP and government entity	USD \$100 (or equivalent in local currency)*
Any third party from the private sector	USD \$200 (or equivalent in local currency)*

*Unless there is a more restrictive limit imposed by any applicable laws or regulations.

In addition to considering the value limits, any gift you offer must be legal, allowed according to applicable laws, and in line with both Cemex’s and the recipient’s policies.

- **Observe value limits when receiving gifts:** The value limit that applies to gifts that Cemex employees may receive from any third party is USD \$100 (or equivalent in local currency). In addition to falling within the value limit, the gift must be offered infrequently, allowed in accordance with applicable laws and aligned with common business practices before you can accept it.
- **Keep it appropriate:** Gifts should be modest in value, occasional and respectful of local customs and company policies. Remember that employees performing procurement functions and activities shall not accept gifts under any circumstances.
- **Never offer or accept cash or cash equivalents:** This includes gift cards, checks or anything that can be easily converted to money.



We exchange gifts and hospitalities responsibly



Examples of acceptable gifts and hospitalities

- Branded items like pens, mugs or calendars
- Greeting cards for holidays or personal milestones
- Modest gifts, meals or outings for team celebrations or work anniversaries

Examples of gifts and hospitalities that are not allowed

- Cash or cash equivalents like gift cards
- Luxury items such as expensive watches or electronics
- Frequent or high-value gifts, meals, entertainment or favors that may suggest bias

Do What's Right



Q: We're finalizing a big contract with a customer, and I want to send them a small thank-you gift after the deal closes. Is that OK?

A: Maybe—but timing and intent matter. Never give a gift during negotiations or in a way that could seem like a reward. If it's a modest, one-time token of appreciation and follows Cemex's and local rules, it may be approved. Always ask your supervisor or Legal first.

When in doubt, ask these questions

Is this something unusual to give to or receive from a third party in a business context?



Is it possibly illegal or inconsistent with Cemex's or the recipient's rules?



Would it raise concerns if it were reported in the news?



Could this gift make me—or the recipient—feel pressured or obligated to do anything?



If the answer to any of these questions is **"yes"** or **"not sure,"** ask your supervisor and/or Legal before giving or accepting the gift.

For more details, see:

- Global Anti-Corruption Policy
- Global Policy on Authorization and Accounting of Corporate Hospitalities to Government Officials

We protect Cemex's assets

Cemex provides employees with tools, equipment and resources to do their jobs. These are company assets, and we all share the responsibility of using them carefully, legally and only for work-related purposes. The company reserves the right to conduct reviews on corporate assets including computers, cellphones and institutional platforms, among others.

Misuse of assets—including credit cards, computers, vehicles, intellectual property, confidential information or company data—can lead to disciplinary action and damage to Cemex's operations or reputation

Protecting company assets

- **Use assets only for work:** Don't use company property for personal gain or non-business activities.
- **Follow corporate credit card policies:** Corporate credit cards must be used only for approved business expenses. Using them for personal items is not allowed.
- **Handle technology responsibly:** Company computers, phones and email should be used only for work-related matters, so be mindful of the information you store or handle at any given time.
- **Care for property:** Keep workspaces clean, and report any lost, stolen or damaged items right away.
- **Ask when unsure:** If you're not sure whether using company assets for a particular case is allowed, check with your supervisor or refer to company policies.

What are Cemex's assets?

Company assets include, but are not limited to:



Corporate credit cards and financial accounts



Computers, hard drives, phones and office tools



Company vehicles, facilities and equipment



Materials, inventory and business supplies



Employee, supplier and customer information



Business records, strategies, confidential information and intellectual property

Use them with care and only as intended.

Using the corporate credit cards

You may use the corporate credit cards for work-related expenses with your supervisor's approval for:

- Business travel and work meals
- Client or supplier meetings
- Small online purchases (books, subscriptions, etc.)
- Area meetings or employee recognition
- Approved education or scholarship costs

All expenses must be work related and in line with usual business practices.

Do not use corporate credit cards for:

- Personal expenses
- Premium program fees (airlines, hotels)
- Office furniture or supplies
- Software or tech equipment

All corporate card charges must be supported with receipts and duly reported as indicated in our company's policies.

Do What's Right



Q: I used my Cemex corporate credit card for a personal meal by mistake. I planned to pay it back but forgot. What should I do?

A: Report the charge to your supervisor right away and arrange for repayment. Even if it is unintentional, using the card for personal expenses violates company policy. Be honest and act quickly to correct the mistake.

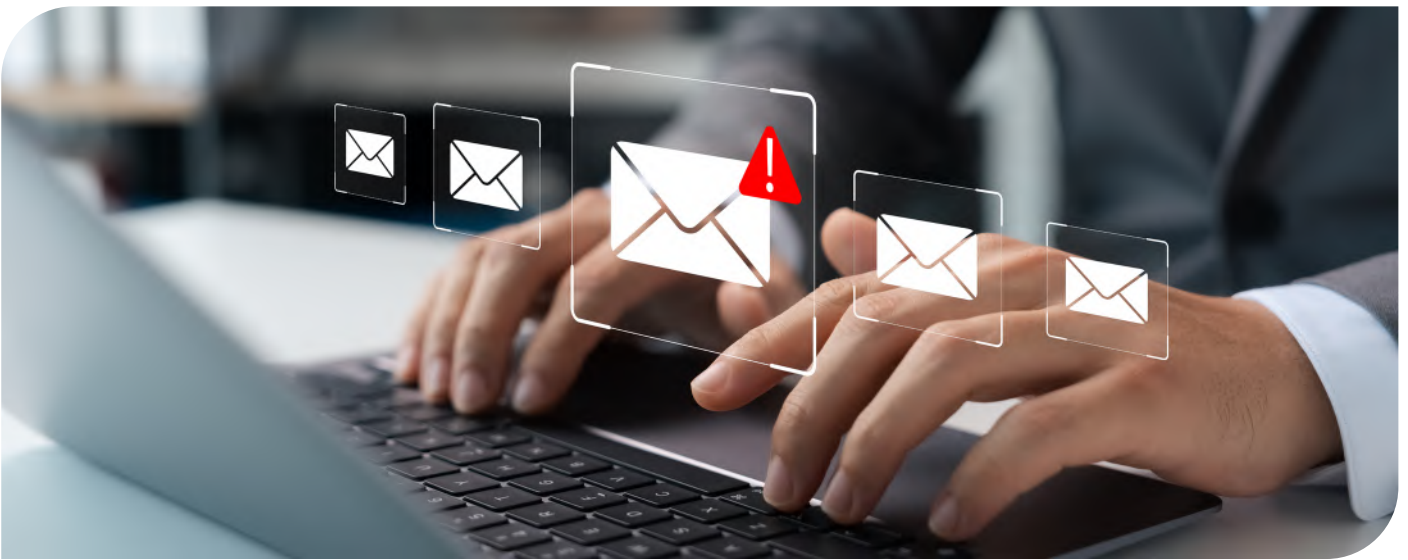
For more details, see:

- Use of Assets Policy
- Company Corporate Cards
- Travel Expenses Policy

We prohibit fraud

We are committed to conducting business with honesty, transparency and integrity. Fraud in any form—such as theft, misrepresentation or falsifying records—goes against our values and will not be tolerated.

Fraud can damage our finances, our reputation and the trust others place in us. Anyone engaging in fraud may face disciplinary action, including termination and legal consequences.



Protecting Cemex from fraud

- **Report truthfully:** Always provide honest, complete information in records, reports and communications.
- **Never alter or hide information:** Falsifying time entries, expense reports or business documents is considered fraud.
- **Exercise caution with credit cards:** Misusing a company card, even once, is a serious violation.
- **Speak up:** Report anything that seems dishonest or suspicious to your supervisor or via ETHOSline or any other official reporting channel.

Examples of fraud

- Submitting fake or inflated receipts for reimbursement
- Using company funds or corporate credit cards for personal purchases
- Stealing materials, equipment or products
- Lying on time cards or travel logs
- Creating or changing documents to hide the truth

If you notice any of these behaviors, report them immediately.

Do What's Right



Q: A team member told me they changed the name on a vendor invoice so it would be paid faster. Is that something I should report?

A: Yes. Changing documents to mislead others is a form of fraud. Even if the goal seems harmless, falsifying records or any type of document is not acceptable and must be reported.

For more details, see:

- Use of Assets Policy
- Company Corporate Card Policy
- Travel Expenses Policy

We manage crisis operations carefully

Cemex is committed to keeping people, operations and communities safe, especially during unexpected events. We follow clear steps to manage risks, respond to emergencies and report problems.

Crises can include natural disasters, safety threats, security issues or environmental incidents. Every employee has a role in helping Cemex respond quickly and responsibly.

Managing crisis situations

- **Know the emergency plan:** Follow your site's plan right away during any crisis.
- **Stay safe and act fast:** Protect yourself and others, then report the issue right away.
- **Report all incidents:** If something affects people, the environment or operations, report it clearly and quickly.
- **Help manage risks:** Work with your team to spot risks that could impact safety or hurt Cemex's business or reputation.
- **Support security measures:** Follow the rules that help protect people, property and information.

Why crisis readiness matters

Being prepared helps Cemex:

- Keep people safe
- Respond fast to reduce harm
- Continue operations during tough times
- Protect our reputation and assets

Do What's Right



Q: During a fire drill, some coworkers didn't know where the evacuation point was. This made me worry about what might happen in a real emergency. What should I do?

A: Let your supervisor know so the team can review the plan together. Regardless, in an actual emergency, you should stay calm and lead by example. Go to the designated meeting point and help others find their way if it's safe to do so.



For more details, see:

- Global Enterprise Risk Management Policy
- Global Security Policy

We protect intellectual property

At Cemex, we recognize the value of new ideas, tools and technology. Whether it's a new product design, software code or creative content, protecting intellectual property (IP) is essential to our success and innovation.

IP includes, but is not limited to, inventions, designs, trade secrets, software, logos, creative works and business methods. Anything developed as part of your job belongs to Cemex, as allowed by law.

Protecting IP

- **Keep it secure:** Do not share ideas, inventions or creative works that belong to Cemex outside the company unless you have approval from Legal.
- **Use tools carefully:** Use only tools and platforms approved by the company to share or store company content. This includes cloud apps, artificial intelligence (AI) tools and file-sharing services.
- **Exercise caution with AI:** Do not enter confidential or sensitive information into AI platforms unless authorized. AI tools may store or reuse what you submit. Always have its output reviewed by a subject matter expert, as it may not be accurate.
- **Respect third-party IP:** Do not use the logos, code, designs or documents of others unless Legal has approved such use.
- **Report ideas:** If you create something new as part of your role, contact the Corporate IP or Legal Departments. Never try to patent or claim it on your own.



Do What's Right



Q: I want to use a public generative AI tool to assist me with a Cemex proposal. I developed the content on my own, and I just want to use the tool for finishing touches and formatting. Is that OK?

A: No. Even if you're using AI technology just for formatting, company content must not be shared with outside platforms unless approved. AI tools may keep or reuse what's entered. Check with Legal before using any tool that processes Cemex material.

Examples of protecting IP

- Avoiding uploading Cemex project files into public AI tools and search engines
- Using company-approved cloud storage—not personal drives
- Labelling internal materials as “confidential” as appropriate
- Getting approval from Legal before using outside content in your work

For more details, see:

- Global Intellectual Property Policy

We keep data secure and private

Cemex works with a wide range of data, from business plans to personal information. We are all responsible for keeping this information secure, private and used only for the right reasons.

Personal data is any detail that can be used to identify someone, either on its own or when combined with other data. This includes things like:

- Name, email address, location or date of birth
- Opinions or comments about a person, like those in a job reference

Some types of personal data are considered especially sensitive under privacy laws. These may include:

- Racial or ethnic background
- Political views or religious beliefs
- Health information
- Union membership
- Data about children

Because of their sensitivity, these types of data often have extra rules for how they must be handled. All personal data—especially sensitive data—should be protected and handled with care.

We follow strict rules to protect all personal data at every level of sensitivity, and we comply with local and international data privacy laws, which may vary by country.

Do What's Right



Q: I'm working remotely and lost access to my laptop. I need to send a document and am thinking of using a shared computer at the hotel. Is that safe?

A: No. Never use public computers or networks to access or send Cemex data. Wait until you can connect with a secure, approved device. Using shared systems puts personal and business data at risk.

For more details, see:

- Global Personal Data Protection Policy

Protecting data

- **Use personal data only for agreed purposes:** Never use it beyond what was outlined in the contract or legal agreement.
- **Limit access:** Share data only with those who need it for work.
- **Avoid public networks and devices:** Don't send or access Cemex data on shared or unsecured systems.
- **Exercise caution with storage and sharing:** Use company-approved tools and do not save files to personal or public cloud services. We must not retain data any longer than necessary.
- **Follow protocols regarding government requests:** Share confidential data only if the request is in writing, legally valid and approved by your supervisor, Legal and other required teams.
- **Report data risks:** If you see or suspect a data breach or misuse, report it right away through Cemex's official channels.
- **Have a lawful basis:** Personal data can only be processed when we have a valid lawful basis, whether through consent or another legal ground, in full compliance with applicable laws and regulations. For guidance on this subject, contact the Legal Department.

Protecting personal and business data

Do:

- Use secure devices and strong passwords.
- Confirm the communication is approved before sending sensitive information.
- Log off when stepping away from a computer.

Don't:

- Share data unless authorized.
- Use public Wi-Fi to access company systems.
- Leave devices or printed materials unattended.

We maintain confidentiality

Protecting confidential information is part of how we maintain trust—with each other, with our customers and with the public. Confidential information includes any nonpublic data that could harm Cemex or our stakeholders if shared.

Even within Cemex, you should share confidential information only with those who are authorized to access it or who have signed a non-disclosure agreement. Sharing confidential information without approval can lead to serious consequences, including legal or disciplinary action.

Keeping information confidential

- **Share only on a need-to-know basis:** Just because someone works at Cemex doesn't mean they should have access.
- **Use secure tools:** Don't send files containing sensitive information using personal devices, public Wi-Fi or unauthorized applications; use only the tools and devices sponsored or authorized by Cemex.
- **Label documents properly:** If information is confidential, mark it clearly and handle it with care.
- **Don't talk in public places:** Avoid discussing confidential matters where others might overhear—this includes, but is not limited to, elevators, airports, restaurants, taxis and coffee shops.
- **Ask before sharing:** If you're not sure whether someone is cleared to access information, check with Legal or your supervisor first.

Examples of confidential information

- Financial data, forecasts and budgets
- Trade secrets and product designs
- Customer and supplier contracts
- Pricing, bids and negotiation plans
- Internal reports, HR files and employee records



Do What's Right



Q: A coworker from another department asked for an internal report. I trust them, but I'm not sure if they're allowed to see it. Should I share it?

A: No. Do not share confidential information unless the person has been approved to receive it. Always verify access with your supervisor or Legal, even if the request comes from someone you know and trust.

For more details, see:

- Global Information Security Policy
- Global Intellectual Property Policy
- Insider Trading and Transactions with Cemex Securities Policy

We keep accurate records

Our records must reflect real business activities—clearly, completely and without delay. We rely on accurate records to support daily operations, ensure legal compliance and provide reliable information to our stakeholders.

This applies to all types of records: financial reports, invoices, time entries, inventory logs, vendor files and business transactions, whether electronic or hard copy.

Maintaining accuracy is not only legally required, it is also a core part of preventing fraud, complying with regulations and supporting our anti-corruption and anti-money laundering efforts. That's why all records must be based on clear documentation, prepared using approved systems and kept in line with company policies.

Keeping accurate records

- **Be honest and complete:** Never hide, alter or misrepresent facts in reports, logs or entries.
- **Use proper documentation:** Support every entry with clear, reliable evidence.
- **Follow company procedures:** Use Cemex's policies for recordkeeping, expense reporting and financial disclosures.
- **Keep records up to date:** Submit records on time and make corrections if errors are found.
- **Keep records only as long as needed:** Follow Cemex's data retention rules. Don't keep records longer than required by law or business needs. But always keep records beyond the scheduled destruction time if there is a 'legal hold' in place.
- **Speak up:** If something seems inaccurate, incomplete or suspicious, report it through ETHOSline or any other official channel.



Do What's Right

Q: I noticed a small error in a shipment record but correcting it will delay a report. My supervisor said to "leave it for now." What should I do?

A: You should speak up. Records must be complete and correct, even if that takes more time. Let your supervisor know you plan to correct it and report the error if needed. Small errors can lead to bigger problems later.

For more details, see:

- Financial Information Policy for Cemex's Listed Companies
- Disclosure Policy
- Global Anti-Corruption Policy
- Global Data Retention Policy

Why accuracy matters

- Helps Cemex meet legal and financial reporting rules
- Prevents misunderstandings or misleading statements
- Supports our anti-corruption and audit controls
- Maintains trust with customers, partners and regulators

We communicate appropriately

Cemex supports open communication, but we all must speak responsibly. What we say online, in public or through other channels can affect how others see our company.

We should never speak on behalf of Cemex unless we're officially authorized to do so. Media inquiries must always be directed to Corporate Communications, Public Affairs and Investor Relations. Sharing internal or confidential information outside the company—even unintentionally—can lead to misunderstandings, privacy issues or harm to Cemex's reputation.

Communicating responsibly

- **Do not speak on behalf of Cemex:** Only trained and authorized spokespersons may talk to the media, analysts or external stakeholders.
- **Watch what you post:** Avoid sharing photos of or content from Cemex facilities that could reveal confidential, private or sensitive information.
- **Think before sharing:** Even well-meaning messages can be misinterpreted—avoid claims that may either sound like “greenwashing” or mislead the public.
- **Be mindful of tone:** Anything you post online may be public—forever. Speak respectfully, even on personal accounts.
- **Direct all external requests:** Refer media, non-governmental organizations (NGOs) and investor questions to the Corporate Communications and Public Affairs teams.

Social media tips

- Clearly state when you are speaking for yourself—not for Cemex.
- Avoid posting internal documents or team discussions.
- Never use social media to harass, insult or mislead.
- Don't create or use a Cemex-branded account without written approval.



Do What's Right



Q: I posted a photo of a Cemex facility on my personal account. A friend commented asking about our climate efforts, and I replied with general information. Was that OK?

A: Probably not. Even well meaning replies can be seen as official statements. It's best not to answer questions about Cemex's policies, performance or strategy unless you're authorized. Instead, refer anyone with questions to our official channels.

For more details, see:

- Online Properties Creation and Use of Social Networking, Media and other Third Party Websites Policy

How to seek help

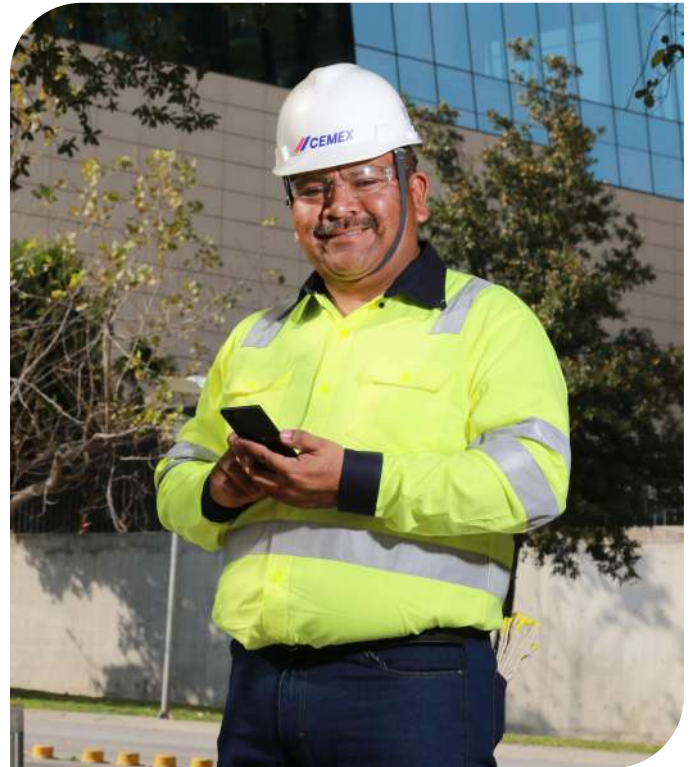
If you have a question or need to report a Code or policy violation, use one of these confidential reporting channels:

- Immediate supervisor
- **ETHOSline**
- Local ETHOS Committees
- Audit Committees
- Legal, Human Resources, Global Internal Audit or Internal Control Departments

ETHOSline



While reports can be made anonymously, by providing a way of communicating with you, such as an anonymous email or telephone number, you can help your committees conduct a fairer and more thorough investigation, reach a resolution more quickly and better address the issue. Cemex will not take any measures to identify anonymous reporters.



Guidance on Policies in the Code of Conduct

Some parts of our Code mention other Cemex policies or guidelines. These can be updated at any time, and local policies and rules may also apply. Always check the most recent version and follow the stricter rule. If you have questions, use one of the reporting channels in “How to seek help.” Remember: When in doubt, ask. It’s better to confirm than assume.

Waivers:

Provisions of this Code cannot be waived.

Doing What's Right

Code of Ethics and Business Conduct

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