

DISCLOSURE POLICY

1. PURPOSE

Loma Negra Compañía Industrial Argentina S.A. (“Loma Negra” or the “Company”) is committed to the accurate disclosure of information in accordance with the Argentine Standards, the Regulation Fair Disclosure from the Exchange Commission (“SEC”), and the Company’s Code of Conduct. Consequently, the Company has adopted this policy to: i) establish a formal procedure for the accurate disclosure of material confidential information; ii) adopt practices related to disclosure and Third-party Investors Relations; and iii) avoid the selective disclosure of confidential material information, whether intentionally or not.

It is always necessary to avoid the selective disclosure of confidential material information and always ensure that all investors have fair and consistent access to information.

2. DEFINITIONS AND ACRONYMS

Confidential information: includes information that is not known or available to the general public. Information is considered available to the general public, and therefore public, only when it has been disclosed in such a way that it is widely spread and the investing public has had time to absorb it. For example, public disclosure means filing Form 6-K with the Securities Exchange Commission (“SEC”) and/or filing information with the National Securities Commission (“CNV”) and/or with Bolsas y Mercado Argentinos S.A. (“ByMA”), or disclosing information through any other form (or combined forms) of disclosure designed to broadly and non-exclusively spread information to the public.

Material Information: A company’s information is considered material when there is a reasonable likelihood that an investor would reasonably consider such information in deciding to buy, hold, or sell company’s securities. Although this standard is not easy to apply, any information that could positively or negatively affect the price of a company’s common stock (or any other security whose value is derived from such securities) should be considered material.

Both positive and negative information can be material, as well as information that forecasts that an event may or may not occur. In case of doubt as to whether certain information is material or not, such information will be considered material.

Some examples of information that is usually considered material information include, without limitation:

- I. significant transactions, such as mergers, public offerings, purchases or sales, financial forecasts (especially profits and losses estimates);
- II. corporate restructuring;
- III. regulatory regulations;
- IV. unanticipated changes in sales, earnings, expenses, or profits that are inconsistent with the agreed expectations of the investing community;
- V. material changes from previously presented financial statements;
- VI. changes in credit ratings;
- VII. stock splits, stock dividends, equity or debt offerings, changes in the Board of Directors, execution or loss of a material contract outside the ordinary course of business, bankruptcy proceedings or composition with creditors;
- VIII. financial performance, especially quarterly and year-end profits and loss statement and key financial metrics, and significant changes in financial performance or liquidity;
- IX. company forecasts, strategic plans, significant changes in installed capacity;
- X. defaults related to outstanding debt or preferred stock;
- XI. bankruptcy filings;
- XII. mergers and acquisitions or the sale of the Company’s assets;
- XIII. changes or disputes with the Company’s independent auditor;
- XIV. significant new contracts, suppliers, customers, or sources of financing, or the loss thereof;
- XV. significant changes or developments in assets offered or services provided, including significant issues and changes in the prices of the Company’s products or services;

- XVI. significant accidents or incidents;
- XVII. events that may impact the Company's ability to offer or deliver products and services;
- XVIII. stock splits, public or private equity/debt offerings, or changes in dividend policies or amounts;
- XIX. changes in the Chief Executive Officer (CEO) and/or Chief Financial Officer (CFO) and/or members of the board of directors;
- XX. significant lawsuits and their respective resolutions;
- XXI. updates related to prior material disclosures that have substantially changed.

3. POLICY DESCRIPTION

This policy is addressed to all directors, officers, employees of Loma Negra and its subsidiaries, and any other person so designated by the Disclosure Policy Committee (collectively, the "Persons").

The disclosures in this policy include, without limitation:

1. information filed with the ByMA, the CNV, and the *Mercado Abierto Electrónico* ("MAE") in Argentina, as well as with the New York Stock Exchange ("NYSE") and the SEC in the United States;
2. statements included in the Company's annual and quarterly reports;
3. financial forecasts prepared for distribution to various recipients;
4. communications regarding Company news and profits and losses;
5. communications between the Company and analysts, investors, and the media;
6. oral statements, including speeches and presentations by senior executives;
7. information included on the Company's website and intranet;
8. statements made by the Company's personnel to external sources, such as creditors, labor unions, environmental agencies, public entities, etc.;
9. all printed materials produced by Loma Negra; and
10. confidential material information disclosed in public areas where conversations may be overheard.

In order to comply with this Policy properly, the following procedures must be followed when addressing specific situations regarding the disclosure of material confidential information:

(i) Analyst Reports and Financial Models

Loma Negra may review drafts of analysts' reports or models. Any comments on such documents will be limited to those parts of the model or report that refer to a statement of historical facts or a description of facts relating to the Company's business that are already of public domain or that provide non-material information, whether public or non-public.

Loma Negra will not give such analyst reports or models through any means to persons outside the Company.

Loma Negra may not use information or quotes from analyst reports as third-party recommendations in documents for external purposes. Such use will imply support of such information or quotes and the conclusions of the report, and therefore it should be avoided.

(ii) Disclosure of Quarterly Profits and Losses Information

Information regarding Loma Negra's quarterly profits and losses will be disclosed as specified herein:

1. First, a press release and other documentation required by applicable regulations that includes an analysis of Loma Negra's quarterly profits and losses will be filed with the BYMA, the CNV, and the NYSE (and immediately thereafter with the relevant wire service for public information). Such press releases will be approved by the Committee. Such documentation will also be previously sent to the Company's Board of Directors and to its independent auditors for review. The press release will also be filed with the SEC on Form 6-K.
2. Advance information regarding the date, time, and connection instructions for the quarterly profits and losses conference call and the date of the quarterly profits and losses announcements will be provided through a press release distributed at least two weeks prior to the call.

3. Finally, the quarterly profits and losses statement calls will be broadcast live on a medium that allows the public to listen to the call, as described in more detail below ("Quarterly Profits and Losses Conference Call").

Assuming compliance with the foregoing provisions, the content of the press release for the corresponding quarter will be freely discussed on the quarterly profits and losses call. No person may discuss the profits and losses or other financial information with anyone outside Loma Negra, except in accordance with this policy.

(iii) Quarterly Profits and Losses Conference Call

Loma Negra will conduct interactive conference calls with analysts and investors on a quarterly basis. After the market close the profits and loss report will be released with a profits and loss conference call the following morning. The Company will announce the date and time of the conference call and the webcast at least two weeks in advance. A "Conference Call Alert" will be distributed to wire services and posted on the Company's IR website. Analysts, institutional investors, and the media will be notified of the conference call via email. Media, private investors, and interested third parties will be able to participate as listeners only. A replay of the call will be made available after five business days. The webcast of the call will be available on the Company's website until the next profits and losses call, at which time it will be moved to the "archive" section. The transcript of the call will be reviewed, edited, and stored in the Disclosure Log along with the audio archive of the call. The edited transcript will also be available on the Company's website.

At the beginning of the call, it will be indicated that forward-looking forecasts may be discussed during the call. Such information will be identified with phrases similar to "based on the following estimates, we believe." Such phrases will be followed by words or references to disclaimers as already included in the available documents. Any summary of the conference call that includes forward-looking statements on the website will include the same disclaimer as part of the transcribed statement.

(iv) Reports Regarding Profits/Losses/Forward-Looking forecasts

If annual profits and losses reports are released, they may be confirmed or updated quarterly together with the announcement of profits and losses or individually through a new release, if necessary. The report will include the underlying estimates and forward-looking information and forecasts that will be available for the year. Such information may include:

1. qualitative statements regarding market conditions;
2. trend information that may affect the Company's business;
3. industry-specific information;
4. qualitative or quantitative statements regarding high-level measures, such as revenue, profits and losses, etc.;
5. estimates or forecasts of factors that may generate profits and losses (but not all of the factors that may be included in the Company's internal financial forecasts);
6. qualitative or quantitative information regarding business measures or estimates; and
7. the Company's plans and objectives for future operations in other areas, including capital expenditures.

Forecasts will be made in good faith and on a reasonable basis. Key estimates underlying forecasts will be disclosed to satisfy reasonable baseline standards.

Any forward-looking statement, whether written or oral, will be identified as such and accompanied by a disclaimer warning investors of the risk that profits and losses may change substantially.

Loma Negra's designated spokespersons will discuss the forecasts with analysts and investors until the waiting period, which begins at 12:01 p.m. three weeks prior to the Company's scheduled releases and end upon public release of the Company's financial statements (or, in the case of the fourth quarter, the annual profits and losses) via press release to the media or through a filing with the SEC and CNV. Outside this timeframe, when the spokespersons are contacted regarding the report, they will refer to the report provided at the end of the previous quarter. During this period, confirmation of the estimate must include a statement that the estimate was accurate as of the reporting date. If the forecast is updated, such update will be accompanied by a widely spread disclosure. No further analysis of profits and losses will be conducted during the waiting period until a formal update is made during the following quarter's disclosure.

Furthermore, if Loma Negra determines that the forecasts provided may be materially higher or lower than anticipated, it will consider making widely spread pre-profits and losses disclosures to avoid "surprises as to profits and losses." This disclosure must be made as soon as the Company becomes aware of the extent of the decrease or increase in profits and losses.

It is contrary to this Policy to comment on forecasts about the Company made by third parties, including information implying that Loma Negra is or remains comfortable with analysts' profits and losses estimate, unless a simultaneous public disclosure is made.

To ensure broad spread without exclusions, the reports will be disclosed consistently through the same channel:

- Alternative A: The report for the fiscal year will be included in the corresponding section of the earnings release, which will be filed with the BYMA, the NYSE, the CNV, and the SEC on Form 6-K, distributed to wire services, as well as to the Company's contact list and posted on its website. A discussion of the report and the key drivers behind the numbers will also be included in the opening remarks of the profits and losses conference call and the profits and losses conference call presentation. If review of the report is needed prior to the profits and losses announcement, a separate publication will be made on this topic.
- Alternative B: The report will be discussed on the conference call, which will be webcast. For this purpose, a "Conference Call and Webcast Alert" will be distributed to the contact list and posted on Loma Negra's website. As usual, the alert will include the date on which the quarterly profits and losses will be released, along with details of the profits and losses conference call. This information will also be disclosed in the quarterly profits and losses release.

A transcript of the conference call will then be posted on the Company's website. This information will be available until the next conference call is announced, at which time it will be archived for future reference.

(v) Waiting Period

To avoid the risk of selective disclosure and the possibility of disclosing preliminary numbers that are inconsistent with actual profits and losses, the Company will determine an appropriate date for the start of the waiting period, which will begin at 12:01 p.m. three weeks prior to the Company's scheduled releases and end upon public release of the Company's financial statements (or, in the case of the fourth quarter, the annual profits and losses) via press release to the media or through a filing with the SEC and CNV.

During this period, Loma Negra spokespersons speaking to the financial community and the media will not comment on the financial profits and losses or the profits and losses report. This applies to all group and individual meetings and conference calls held during this period, including conversations with sales analysts.

(vi) Meetings and Conferences with Investors and Analysts

The Company will periodically conduct individual interviews or small meetings with analysts and investors. The purpose of these meetings is to provide factual information, explain strategies, or analyze immaterial quantitative information.

The Committee must approve participation in meetings and conferences. Two people from Loma Negra must be present at each meeting to detect selective disclosure of confidential material information. The Committee must approve the topics and talking points to which speakers must strictly adhere.

If Company-sponsored meetings are not posted online, Loma Negra spokespersons will be careful to avoid disclosure of confidential material information in the presentation or during the question-and-answer session.

(vii) Market Rumors and Leaks

As a general rule, Loma Negra will not comment on rumors. Whenever it is clear that the Company is not the source of the market rumor, it should respond with the following statement: "It is the Company's policy not to comment on market rumors or speculations." A more detailed statement should be made if the rumor persists and impacts trading. Likewise, every effort should be made to determine the source of the rumor.

An appropriate public announcement should be made if the rumor or unusual market activity indicates that information about future developments has been leaked. The Committee should approve the response. Assuming the rumor is true, but for valid internal reasons Loma Negra management does not wish to disclose information, a "no comment" policy should also be followed. A refusal could lead to litigation, given that the Company is aware of the information; therefore, legal counsel should be obtained in such a case.

If confidential material information is selectively disclosed, the announcement of the information should be made in such a way that it is widely spread. If confidential material information is unintentionally selectively disclosed, public disclosure should be made as soon as possible but no later than 24 hours or the start of the next trading day after the selective disclosure. In the case of internal disclosure, spread to the general public will be simultaneous.

(viii) Press Releases

New relevant developments will be disclosed through press releases unless the Committee determines that such developments should remain confidential temporarily due to a legitimate purpose.

All press releases, even those ones deemed "non-financial or non-material," must be approved by the Committee members. This includes marketing-related releases and releases by subsidiaries and joint ventures. The Committee will also approve all direct press releases to the financial community.

As soon as the release is submitted to the BYMA, the NYSE, and the CNV, it will be distributed to disclosure channels, posted on the website, and then emailed to Loma Negra's list of analysts and investors. The Form 6-K to be filed before the SEC will include disclosed information.

(ix) Information on the Website

It is important that all investor-related information be added to the Company's website immediately. The Investor Relations Committee and the Management are responsible for monitoring all Company information published on the website to ensure it is accurate, complete, and up-to-date. This information must be reviewed periodically. The Committee must approve all information to be published on the website. Confidential information will be archived after a period of time to be determined by the Committee.

(x) Insiders

All directors, officers, and employees of the Company are subject to the prohibitions established in Loma Negra's Insider Trading Policy.

(xi) Media Policy

The importance of the media in communicating information and building the Company's reputation should not be underestimated. Furthermore, prematurely disclosing information to the media that deviates from the Company's message can generate misinformation, rumors, and confusion in the market. As such, the resulting stories can have serious consequences for the Company's image, its position in the financial markets, and a negative impact on the stock price and Loma Negra's credibility.

For this reason, no person other than the designated spokesperson with the express consent of the Committee is authorized to speak with a representative of any media, including print, broadcast, wire services, and online, regarding any aspect of Loma Negra's business and operations.

In addition, the Committee must approve disclosures of confidential material information to the media. Prior to disclosure, the information must be shared with Investor Relations Management and will be published in the media through Investor Relations Management or Legal and Corporate Affairs Management. All employees with access to confidential information are responsible for maintaining its confidentiality and preventing premature or inappropriate disclosure.

Investor Relations Management will coordinate all media activity for the entire Company, review media requests, and determine the response and Loma Negra spokesperson for each situation, including requests made to subsidiaries. The Legal and Public Affairs Department will verify the validity of the calls and refer the journalist to the designated spokesperson.

(xii) Social Media and Media. Special Procedure for Posting Non-Confidential Information on LinkedIn, Facebook, and Instagram.

Loma Negra recognizes that all employees may wish to participate in forums, blogs, social media, and similar online discussion sites for personal and professional development. It is important to note that communications made on behalf of the Company in these forums are subject to the securities laws and regulations of Argentina and the United States. Unless expressly authorized by the Company, all persons subject to this Disclosure Policy are not allowed to discuss and/or mention commercial information belonging to the Company in these forums and/or social media. Persons subject to the Disclosure Policy should be aware that, unless they are a designated Loma Negra spokesperson, their discussion of confidential material information related to the Company's business and financial condition in these forums may compromise the Company's confidential information, have a negative impact on society, and be considered selective disclosure in violation of Argentine and United States securities laws.

Should an employee or any person subject to the Disclosure Policy disclose material or business information without being duly authorized by a Loma Negra spokesperson, the Company may take appropriate disciplinary action under applicable law.

- **Special Procedure for Publication of Non-Confidential Information on LinkedIn, Facebook, Instagram, Youtube and Local Media**

The Committee may authorize the publication or dissemination to third parties of the content indicated below (1) to (4) only on LinkedIn, YouTube, Facebook, Instagram, and local media with the joint written approval of any two of its

members, provided that: (i) the content of the publication is not confidential; and (ii) all Committee members have been informed in writing of:

- 1) content of external presentations by Loma Negra employees at conferences and seminars;
- 2) internal and external training programs for Loma Negra employees;
- 3) marketing content related to the advertising of Loma Negra products;
- 4) content of the Loma Negra Foundation.

The above list is exhaustive. In case of doubt, the necessary approval must be obtained for the publication of confidential material information.

4. RESPONSIBILITY

The Disclosure Policy Committee (the "Committee") is directly responsible for the compliance with this policy. The purpose of the Committee is to obtain information from Company spokespersons on disclosure matters and ensure consensus regarding the Company's messages and policies.

This Committee will be composed as follows:

1. Chief Executive Officer (CEO)
2. Chief Financial Officer (CFO)
3. Human Capital, Sustainability and Legal Director
4. Legal and Corporate Affairs Manager
5. Investors' Relations Manager

The Committee or its designee will review all speeches, statements, presentations to securities analysts and institutional investors, including the wording of conference calls and other external communications, prior to publication. The Committee must approve the Company's forecasts. The Committee will also decide whether the information is considered material and should be disclosed to the public by communicating a "relevant fact" to the market. It must assess the implications for the Company and ensure that all disclosures are accurate and appropriate.

The Committee members will also have other duties. Selected Committee members must approve the content of informal corporate disclosures to analysts, investors, and the press unless expressly authorized by this Policy.

The Committee will meet quarterly prior to the announcement of profits and losses and as required to fulfill its responsibilities. The Committee will periodically review the content of the Policy, and the Legal and Corporate Affairs Manager will keep it updated with changes in regulatory and legal requirements.

4.1. COMPANY SPOKESPERSON

Only the Loma Negra officials listed below may represent the Company before securities professionals and the media as Loma Negra spokespersons:

1. General Director (CEO)
2. Chief Financial Officer (CFO)
3. Human Capital, Sustainability and Legal Director
4. Legal and Corporate Affairs Manager
5. Investors' Relations Manager

Pursuant to this policy, persons other than those authorized to speak on behalf of the Company may not, under any circumstances, respond to inquiries from the media, the investment community, or industry analysts unless specifically authorized to do so by a Loma Negra spokesperson. This will help ensure consistent and accurate disclosures and prevent selective disclosures. Persons receiving such inquiries should refer, directly or indirectly, the person making the inquiry to the designated Loma Negra spokesperson.

If necessary, the spokesperson may authorize other individuals at or associated with Loma Negra to address specific issues. No other Loma Negra employee should address analysts, investors, or reporters without the knowledge and consent of a designated Loma Negra spokesperson. It is essential that spokespersons be adequately informed of all Company developments and in a position to evaluate and analyze important elements that may impact the disclosure process.

If a Company's spokesperson or other individual believes that confidential material information may have been disclosed, they should immediately notify the Investor Relations Manager and the Legal and Corporate Affairs Manager. The Company must then determine the appropriate disclosure, if any, to be made in accordance with the regulations of the BYMA, the NYSE, the CNV, and the SEC.

5. CONTEMPLATED RISKS

- Impact on Loma Negra's image;
- Disclosure of confidential information.
- Transparency, fair, and consistent access to information for all investors.
- Potential financial harm to the Company.

6. DISPUTE RESOLUTION

6.1. Questions and clarifications regarding the interpretation or application of this Policy should be directed to the Legal and Corporate Affairs Department, who will respond promptly.

6.2. Any violation of the Policy must be immediately reported to the Investor Relations Manager and the Legal and Corporate Affairs Manager. Any violation of the Policy that is specifically related to the Investor Relations Manager and/or the Legal and Corporate Affairs Manager of the Company will be reported to the Board of Directors.

6.3. Sanctions: in addition to applicable civil, criminal, and administrative sanctions, violations of the terms of this Policy will be reviewed by the Board of Directors, who will take appropriate action.

7. HISTORY

Version 1.0. Prepared by: Luciano Federico Babuin, Diego Matías Jalón. Date: July 31, 2024.