INSIDER TRADING POLICY

1. PURPOSE

This document sets forth the Insider Trading Policy (the "Policy") of the Company. The Policy establishes the provisions and procedures governing the purchase and sale by the Company's personnel of securities, and of securities of any other company with respect to which such personnel may obtain material confidential information in the course of their duties to the Company.

The Policy has been adopted by the Company to comply with its obligations as a company whose securities are listed on stock exchanges under Argentine law and the United States securities laws, to prevent insider trading, and to protect its personnel from the severe consequences associated with violations of insider trading laws. This Policy aims to prevent inappropriate conduct by employees or persons related to the Company. Any questions regarding this Policy should be directed to the Company's Audit and Compliance Manager (the "Securities Compliance Officer").

All employees must carefully read this Policy. Failure to comply may result in disciplinary measures, including immediate termination. Non-compliance may also constitute violations of Argentine law and U.S. Securities Laws, which may result in civil and criminal penalties.

2. DEFINITIONS AND ACRONYMS

- Associates: has the meaning set forth in Section 3.II.
- Blackout Period: has the meaning set forth in Section 3.IV(ii).
- CNV: means the Argentine National Securities Commission (*Comisión Nacional de Valores*).
- Company: means Loma Negra C.I.A.S.A., together with its subsidiaries.
- Committee: has the meaning set forth in Section 3.V.
- Covered Person: has the meaning set forth in Section 3.I.
- Derivative Security: has the meaning set forth in Section 3.I.
- Designated Blackout Period: has the meaning set forth in Section 3.IV(ii).
- Material Information: has the meaning set forth in Section 3.III.
- Policy: has the meaning assigned in Section 1.
- Quarterly Blackout Periods: has the meaning set forth in Section 3.IV(i).
- SEC: means the U.S. Securities and Exchange Commission.
- Securities Compliance Officer: means the Company's Audit and Compliance Manager.

3. POLICY DESCRIPTION

I. Scope of the Policy

All directors, officers, and employees of the Company, members of the statutory audit committee, controlling shareholders and their respective representatives and/or employees, as well as any other person designated by the Securities Compliance Officer, are subject to the prohibitions set forth in this Policy and to its provisions (each, hereinafter, a "Covered Person").

The restrictions imposed by this Policy apply to transactions in the Company's securities, as well as to any instrument that derives its value from the price of the Company's securities, including, without limitation, call options, put options, options, and convertible securities, whether or not issued by the Company (a "Derivative Security"), subject to the restrictions set forth in Clause 3.VI hereof. In other words, the restrictions imposed by this Policy also apply to transactions in securities of any company, whether related or unrelated to the Company, with respect to which the Covered Person obtains material non-public information in the performance of their duties for the Company. For example, securities of any company with which the Company negotiates or may negotiate significant transactions, and Derivative Securities of any of the aforementioned securities.

II. Other persons covered by this Policy

Each of the provisions and procedures included in this Policy that bind a Covered Person shall also apply to "Associates" of such Covered Person. These Associates are: (i) any Family Member (as defined below) who lives in the same household as

In the event of any inconsistency or discrepancy between this English version and the Spanish version, the Spanish version shall prevail.

the Covered Person; (ii) any other person who lives in the same household as the Covered Person; and (iii) any Family Member who does not live in the same household as the Covered Person but whose transactions in the Company's securities or Derivative Securities are directed by, or subject to the influence or control of, the Covered Person (such as parents or children who consult with a Covered Person before trading in the Company's securities or Derivative Securities). Family Member includes the following persons: child, adopted child, grandchild, father, adoptive father, mother, adoptive mother, grandparent, spouse (or domestic partner), sibling, parent-in-law, son-in-law, daughter-in-law, or sibling-in-law, including adoptive relationships.

This Policy also covers entities that a Covered Person may control, including partnerships or controlled trusts, and transactions pursuant to which such entities must be treated for purposes of this Policy as if they were conducted on behalf of such Covered Person, unless such entities customarily engage in investing in securities in the ordinary course of their business activities (for example, an investment fund or investment company). In addition, such entities must confirm, to the reasonable satisfaction of the Securities Compliance Officer, that they have their own insider trading policies and procedures in accordance with applicable laws.

There may be situations in which a Covered Person holds an interest in securities but has no responsibility for investment decisions, such as where investment decisions are delegated to an investment advisor. In such cases, this Policy is not intended to prohibit arrangements regarding securities, provided that the Covered Person has not made the investment decision nor provided material non-public information to the person(s) responsible for making such decision. This Policy also does not prohibit the purchase, sale, or holding of interests in publicly traded investment funds, even if such funds hold or trade in the Company's securities or Derivative Securities.

For the avoidance of doubt, it is hereby clarified that all prohibitions, provisions, and procedures set forth in this Policy apply not only to each Covered Person, but also to their Associates and to all persons and entities listed in this Clause 3.II, even if not expressly mentioned. Each Covered Person is responsible for ensuring that each Associate or other person or entity listed in this Clause 3.II subject to this Policy complies with it. Any reference hereinafter to a "Covered Person" shall be deemed to include such associated persons.

III. General Prohibition on Trading on Insider Information

Any Covered Person who has knowledge of "Material Information" (as described below) related to the Company that has not been publicly disclosed is prohibited from: (i) trading in the Company's securities or Derivative Securities; (ii) advising third parties on whether to trade or not to trade in the Company's securities or Derivative Securities; or (iii) disclosing material information to any person for the purpose of enabling them to trade or not trade in the Company's securities or Derivative Securities. These restrictions shall remain in effect until such information is publicly disclosed or until it ceases to be material, even if it has not been disclosed.

Any Covered Person who, during their employment or relationship with the Company, becomes aware of "Material Information" relating to any other company that has not been publicly disclosed is prohibited from: (i) trading in the securities or Derivative Securities of such other company; (ii) advising third parties on transactions involving the securities or Derivative Securities of such other company; or (iii) disclosing material information to any person for the purpose of enabling them to trade in the securities or Derivative Securities of such other company. These restrictions shall remain in effect until such information is publicly disclosed or until it ceases to be material, even if it has not been disclosed.

The Covered Person and/or Associate shall not be relieved of liability for the disclosure of insider information and/or for transactions carried out based on such information, even when: (i) there is a delay in the disclosure of material information that results in a financial loss; (ii) there are personal reasons for carrying out the transaction, such as the need to obtain funds for an emergency expense; (iii) they had decided to participate in a transaction before becoming aware of material non-public information, except in the case of "*Approved Trading Plans*" mentioned in Clause 3.VI; or (iv) publicly disclosed information of the Company or a related company provides a substantial basis for participating in the transaction, without considering the undisclosed material information.

In this regard, Argentine law and the U.S. federal securities laws do not recognize exceptional circumstances; therefore, even the appearance of improper trading must be avoided in order to preserve the Company's reputation and to avoid the application of the aforementioned sanctions.

Material Information

In general, information about a company is considered material when there is a substantial likelihood that a reasonable investor would consider such information in making a decision to buy, hold, or sell securities of that company. While this standard is not easy to apply, any information that may positively or negatively affect the price of a company's common stock or any Derivative Security should be considered material. Examples of information that is almost always considered material include: significant transactions such as mergers, tender offers, acquisitions, or disposals; financial projections (especially earnings estimates); corporate restructurings; regulatory actions; unexpected changes in sales, earnings, or expenses, or earnings that are inconsistent with investor expectations; material changes in previously issued financial statements; changes in credit ratings; stock splits and/or changes in par value; offerings of securities or debt; changes in the board of directors; entering into or loss of significant contracts; bankruptcy or insolvency proceedings, among others.

Any Covered Person who has doubts regarding the materiality of confidential information is advised to contact the Securities Compliance Officer for guidance. In case of doubt regarding the materiality of confidential information, the Covered Person must refrain from trading.

Public Disclosure

Public disclosure of material information generally means filing such information with the Argentine regulatory authority, the CNV, and/or the U.S. regulatory authority, the SEC (for example, the Company's annual report on Form 20-F or current reports on Form 6-K), or otherwise disseminating it to the market in a manner designed to reach investors in general (such as through press releases or publication in a national outlet). More limited disclosures, such as Company communications to employees (even if made to all employees), do not qualify as public disclosure. To ensure proper disclosure, at least one (1) full trading day must elapse after public disclosure to allow the securities markets time to absorb the information.

The Company is committed to proper disclosure of information in accordance with SEC regulations and Argentine rules in order to avoid selective disclosure of material non-public information. Accordingly, the Company has established specific procedures for disclosing material information to the public promptly after its release, in accordance with the Disclosure Policy. Therefore, Covered Persons may not disclose information to persons outside the Company (including Family Members and friends) except as permitted by such procedures. Nor may they discuss material non-public information about the Company or its business in chats, social media, or internet sites.

Additional Guidance

Covered Persons who are prohibited from trading in the Company's securities, securities of any other company, or Derivative Securities due to possession of material non-public information are also prohibited from: (i) disclosing such information to third parties for the purpose of enabling them to trade in the aforementioned securities; or (ii) providing advice based on confidential information in connection with transactions involving the aforementioned securities, even if such confidential information is not disclosed. Such disclosure or advice in connection with trading constitutes a violation of Argentine law and U.S. federal securities laws and may result in liability for the person providing the information, the person receiving it, and the Company and its officers.

IV. Blackout Periods

Covered Persons are prohibited from trading in the Company's securities or Derivative Securities during blackout periods, regardless of whether they actually possess material non-public information.

a. Regular Blackout Periods

There are four regular blackout periods with respect to trading per year (the "Quarterly Blackout Periods"). Each Quarterly Blackout Period begins at 12:01 a.m. three weeks prior to the Company's scheduled publications and ends at 11:59 p.m. at the close of the first full trading day following the public disclosure of the Company's financial statements (or, in the case of the fourth quarter, the annual results) through a press release to the media or through a filing with the SEC and the CNV.

Covered Persons are prohibited from trading in the Company's securities or Derivative Securities during Quarterly Blackout Periods. A Covered Person may not make a gift or donate the Company's securities or Derivative Securities during a Blackout Period, as defined below, without the prior approval of the Securities Compliance Officer.

b. Designated Blackout Periods

Any Covered Person, at any time and from time to time, may be informed by the Securities Compliance Officer that he or she, and his or her Associates, are subject to a designated blackout period due to such person's involvement in or knowledge of a particular matter (a "Designated Blackout Period", and together with the Quarterly Blackout Periods, a "Blackout Period"). Covered Persons so advised are prohibited from trading in the Company's securities or Derivative Securities until they receive further written notice from the Securities Compliance Officer. The existence of a Designated Blackout will not be announced other than to those who are subject to it. Any Covered Person or their Associates made aware of the existence of a Designated Blackout Period should not disclose the existence of such blackout for any reason.

It is important to keep in mind that, even if a Blackout Period is not in effect, the prohibition on trading on material, non-public information continues to apply at all times.

V. Pre-clearance Procedure for Directors, Managers and Certain Employees

There are circumstances in which certain Covered Persons, by virtue of their role and/or position within the Company, typically have access to material non-public information on a frequent basis. This situation makes it advisable to establish a specific pre-clearance mechanism for such persons when they intend to trade in the Company's securities or Derivative Securities.

Therefore, without prejudice to the general prohibition set forth in Clause 3.III and the blackout periods applicable to all Covered Persons, the following individuals must also request prior approval before carrying out any transaction involving the Company's securities or Derivative Securities:

a) All individuals holding positions as Directors, Superintendents, Managers and Leaders (or equivalent positions, regardless of their title or designation) of the Company, its subsidiaries and controlling entities, whether directly or indirectly.

b) Any individual specifically designated by the Securities Compliance Officer.

c) Any Covered Person or their Associates who intend to carry out transactions that, individually or jointly (considering a 365-day period prior to the transaction(s)), exceed the amount of USD 10,000 (Ten Thousand) or its equivalent in local currency based on the exchange rate on the date the transaction(s) are executed.

d) All Associates of the persons mentioned in the preceding items.

The persons included in items a), b) and c) above must inform and request in writing, at least 48 hours in advance, approval from the Securities Trading Approval Committee (the "Committee") for any transaction they intend to carry out involving the Company's securities or Derivative Securities, whether on their own behalf, through a legal entity with which they are affiliated, or to be carried out by one of their Associates. The Committee is composed of the following members:

1. Chief Financial Officer (CFO);
2. Commercial Director, Concrete & Aggregates;
3. Director of Human Capital, Sustainability and Legal Affairs; and
4. Audit and Compliance Manager.

The Committee will issue and notify in writing the approval or rejection of such request within 48 business hours of submission. The transaction will be deemed approved only if the consent of all Committee members is obtained. If approval is granted, the authorization will allow the transaction to be carried out within 48 business hours from the business day following the granting of approval. After this period, the interested party must request approval again from the Committee. The Committee will keep a record of the date and details of each request received and its respective decision.

In the event of absence or impediment of any Committee member, the Chief Executive Officer (CEO) shall fill the vacancy. Likewise, in cases where one of the Committee members intends to carry out a transaction involving the Company's securities or Derivative Securities, such member must request approval from the Committee and abstain from voting, in which case they will be replaced by the Chief Executive Officer (CEO).

VI. Approved Trading Plans

Transactions by Covered Persons and their Associates pursuant to a written trading plan (an "Approved Plan") shall not violate this Policy and shall not be subject to Blackout Period restrictions or pre-approval procedures, provided that the following conditions are met:

- the Securities Compliance Officer must approve the Approved Plan prior to it being executed;
- The Approved Plan must comply with the requirements of Rule 10b5-1 under the U.S. Securities Exchange Act of 1934, as amended, including the following:
  a. it must be a written, binding contract, instruction or plan entered into outside of a Blackout Period and at such time when the Covered Person is not in possession of material, non-public information;
  b. the Approved Plan must expressly specify the amounts, prices and dates of transactions (specifically or through a written formula, or a combination thereof) or confer discretionary authority on another person (who is not a Covered Person or Associate and otherwise is not in possession of material non-public information) to effect one or more purchase or sale transactions for the account of the instructing person;
  c. the instructing person may not exercise any subsequent influence over how, when or whether the transactions are effected; and
  d. the purchase or sale must occur pursuant to the Approved Plan.
- Any Covered Person or their Associate must report to the Securities Compliance Officer (i) all transactions made pursuant to the Approved Plan and (ii) the completion or termination of the Approved Plan.

- If required by the bank or broker executing the Approved Plan, the Approved Plan may be required to include a minimum 14-day waiting period after execution and before any trade is made (and such period may be longer depending on the policies of such bank or broker).

The Securities Compliance Officer will approve any Approved Plan that complies with the terms of this Section 3.VI.

VII. Short Term Speculation; Hedging Transactions; Margin Accounts and Pledges

The Company considers it improper and inappropriate for any Covered Person or their Associates to engage in short-term or speculative transactions in the Company's securities or in other transactions in the Company's securities that may transfer the full risks and rewards of ownership over the Company's securities. Therefore, it is the Company's policy that Covered Persons and their Associates may not engage in any of the following transactions:

- *Publicly Traded Options*. A transaction in options is, in effect, a bet on the short-term movement of the Company's shares and therefore creates the appearance of trading based on inside information. Transactions in options also may focus attention on short-term performance at the expense of long-term objectives. Accordingly, transactions in puts, calls or other Derivative Securities, on an exchange or in any other organized market, are prohibited absent prior written approval of the Securities Compliance Officer.
- *Standing Orders*. A standing order placed with a broker to sell or purchase the Company's shares at a specified price leaves the shareholder with no control over the timing of the transaction. A transaction pursuant to a standing order – which does not meet the standards of an Approved Plan – executed by the broker when the Covered Person is aware of material non-public information may result in unlawful insider trading. Accordingly, standing orders are prohibited during any regular or designated blackout period and at any time that the Covered Person is aware of material, non-public information.
- *Hedging Transactions*. Certain forms of hedging or monetization transactions allow Covered Persons to lock in much of the value of their Company's securities, often in exchange for all or part of the potential for upside appreciation in the securities. These transactions allow the Covered Person to continue to own the covered Company securities, but without the full risks and rewards of ownership. Such transactions may use methodologies or financial instruments including, but not limited to, short sales, puts, calls, collars, prepaid variable forward contracts and exchange funds. When that occurs, the Covered Person may no longer have the same objectives as the Company's other securityholders. Therefore, Covered Persons are prohibited from employing any such methodologies or using any such financial instruments with respect to the Company's securities absent prior written approval of the Securities Compliance Officer.
- *Margin Accounts and Pledges*. A Covered Person may not hold the Company's securities in a margin account or pledge the Company's securities as collateral because a margin or foreclosure sale may occur at a time when such Covered Person is aware of material non-public information or otherwise prohibited from trading in the Company's securities. Under certain circumstances an exception may be granted for a Covered Person to pledge the Company's securities as collateral for a loan (not including margin debt) where the Covered Person clearly demonstrates the financial capacity to repay the loan without resorting to the pledged securities. Any Covered Person that wishes to do so must submit a request for approval to the Securities Compliance Officer at least two weeks prior to the proposed execution of documents evidencing the proposed pledge and the Securities Compliance Officer shall have absolute discretion over approving or rejecting such proposed pledge.

Any Covered Person who has questions as to whether a particular strategy would violate the Policy is advised to contact the Securities Compliance Officer.

VIII. Application of the Policy to Bona Fide Gifts

A bona fide gift of the Company's securities or Derivative Securities is subject to the restrictions contained in the Policy. The recipient of a gift who is a Covered Person or an Associate of a Covered Person would be subject to the restrictions of this Policy in connection with any subsequent sale of the gifted securities.

IX. Post-Termination Transactions

The restrictions imposed by the Policy will continue to apply to a Covered Person and their Associates after the termination of his or her employment with or engagement by the Company for such period of time as such Covered Person is aware of material, non-public information until that information has become public or is no longer material. If a Covered Person's employment or engagement has ended within a Blackout Period, he or she shall be subject to the Blackout Period restrictions detailed above.

X. Reason for the Prohibition

Under Argentine laws and U.S. federal securities laws, it is unlawful for any director, officer or employee of, or any person otherwise associated with, a public company to trade, or to enable others to trade, in the securities of that company while in possession of material, non-public information. Violators may be subject to criminal prosecution and/or civil liability.

A criminal prosecution in the United States can result in a fine of up to $5 million (no matter how small the profit or even if there is a loss) and imprisonment for up to 20 years. A criminal prosecution under the Argentine Criminal Code can also result in fines and imprisonment for up to four years. Civil actions may be brought by a private plaintiff or the SEC. A person who has been found in a civil action brought by the SEC to have violated the prohibition on insider trading by purchasing or selling a security while in possession of material, non-public information, or by communicating such information to another person who engages in such trading, can be held liable for a penalty up to three times the profit gained, or the loss avoided, by the person who traded while in possession of material, non-public information. The SEC also has the authority to obtain a court order that bars a person who has engaged in insider trading from serving, either permanently or for a period of time, as a director or officer of a public company. There are no limits on the size of the transaction that can trigger insider trading liability. Relatively small trades have in the past occasioned civil and criminal investigations and lawsuits.

Insider trading also can generate significant adverse publicity and, as a result, cause a substantial loss of confidence in the Company and its securities on the part of the public and the securities markets. This could have an adverse impact on the price of the Company's shares and other securities to the detriment of the Company and its shareholders.

Remember, anyone scrutinizing your transactions in the Company's securities or Derivative Securities will be doing so after the fact, with the benefit of hindsight. As a practical matter, before engaging in any transaction, you should carefully consider how enforcement authorities and others might view the transaction in hindsight.

XI. Conclusion

The Company will strictly enforce the prohibitions on trading on insider information, as well as the additional restrictions and procedures set forth in this Policy. Any Covered Person or Associate who has doubts regarding the application of this Policy must contact the Securities Compliance Officer prior to carrying out any transaction involving the purchase or sale of the Company's securities or Derivative Securities, in order to determine whether they would be acting appropriately.

Special care must be taken, as avoiding even the appearance of engaging in transactions involving securities using material non-public information is just as important as avoiding actually carrying out a transaction based on such information.

5. RESPONSIBILITY

Compliance with this Policy is the direct responsibility of the Committee.

6. RISKS COVERED

The risks addressed in this Policy include:

a) Impact on the Company's reputation.

b) Selective disclosure of material non-public information.

c) Transparency, and fair and consistent access to information for all investors.

d) Potential economic harm to the Company.

6. CONFLICT RESOLUTION

- Questions and clarifications regarding the interpretation or application of this Policy should be addressed to the Securities Compliance Officer.
- Any violation of the Policy should be reported immediately to the Securities Compliance Officer. Any violation of the Policy that is specifically related to the Company's Investor Relations Manager and/or the Company's Legal and Corporate Affairs Manager shall be reported to the Board of Directors.
- Sanctions: In addition to applicable civil, criminal and administrative penalties, violations of the terms of this Policy will be reviewed by the Board of Directors, who will take appropriate action.

7. HISTORY

Version 2.0: Prepared by: Christian Eduardo Fortini, Date: January 8, 2025.