ARTIFICIAL INTELLIGENCE POLICY

1. OBJECTIVE

Establish frameworks and guidelines for the ethical and secure development, implementation, and use of artificial intelligence (AI). This policy will guide the behavior of collaborators and third parties in relation to AI systems, ensuring compliance with laws and regulations, transparency, risk and bias mitigation, and the protection of personal data. This policy will provide clear guidelines for the adoption of technical and organizational measures to ensure the cybersecurity and integrity of AI-driven processes.

2. GLOSARY

- **Artificial Intelligence (AI):** Artificial intelligence refers to the simulation of human intelligence processes by computer systems. These processes include learning (the acquisition of information and rules for using it), reasoning (using rules to reach approximate or definitive conclusions), and self-correction.
- **AI Systems:** An AI system is any system that uses artificial intelligence technology to perform tasks that normally require human intelligence, such as speech recognition, decision-making, language translation, and visual perception. These systems can be software, hardware, or a combination of both.
- **AI Technology:** AI technology encompasses the tools, techniques, and methodologies used to develop and operate artificial intelligence systems. This includes machine learning algorithms, neural networks, natural language processing, and computer vision, among others.
- **AI Application:** An AI application is a specific use of artificial intelligence technology to solve problems or improve processes in various areas, such as healthcare, education, manufacturing, commerce, security, and many other fields. Examples include virtual assistants, recommendation systems, and predictive analytics.
- **Data bias:** Data bias occurs when the data used to train an AI model does not adequately represent the population or phenomenon being analyzed. This can result in models producing unfair or inaccurate results, inadvertently favoring or disadvantaging certain groups. The cause of the bias can be in data collection, sampling, annotation, or processing.
- **Algorithm:** An algorithm is a finite sequence of steps or instructions followed to solve a problem or perform a specific task. In the context of AI, algorithms are fundamental to the development of machine learning models and other artificial intelligence applications.
- **Machine Learning:** Machine learning is a branch of artificial intelligence that focuses on the development of algorithms and techniques that allow computers to automatically learn and improve based on experience without being explicitly programmed for each task. This is achieved by analyzing large amounts of data and identifying patterns.
- **Neural Networks:** Neural networks are a type of machine learning algorithm inspired by the workings of the human brain. They consist of layers of nodes (or "neurons") that process information and can learn to perform complex tasks by adjusting the connections between nodes in response to input data.
- **Natural Language Processing (NLP):** Natural language processing is a subdiscipline of artificial intelligence that deals with the interaction between computers and humans using natural language. The goal of NLP is to enable machines to understand, interpret, and respond to human language input in useful and meaningful ways.
- **AI Ethics:** AI ethics refers to the principles and guidelines that should be followed in the development and deployment of artificial intelligence technologies to ensure they are

fair, transparent, and benefit society. This includes considerations of privacy, fairness, accountability, and bias mitigation.

3. SCOPE

This artificial intelligence policy applies to all areas and departments of GRUPO ARGOS S.A. and its subsidiaries (Cementos Argos, Celsia, Odinsa, Summa), including the development of new AI systems or applications, the implementation of existing AI systems, the updating or modification of AI systems in use, and any other process involving the use, application, or integration of artificial intelligence technologies. Likewise, this policy must be respected by all employees, as well as by all persons or entities that develop, implement, use, or interact with artificial intelligence systems in the companies.

4. POLICY

ARTIFICIAL INTELLIGENCE POLICY

GRUPO ARGOS S.A. and its subsidiaries (Cementos Argos, Celsia, Odinsa, Summa), in compliance with applicable laws and regulations, are committed to using Artificial Intelligence (AI) responsibly and ethically, seeking to obtain operational and business benefits, while protecting the rights and safety of its employees, customers, and other stakeholders.

By implementing AI governance and risk management practices, GRUPO ARGOS S.A. and its subsidiaries will identify, assess, and mitigate potential adverse impacts in areas such as privacy, equity, transparency, and accountability. Furthermore, the Business Group will ensure that the development and use of AI systems is aligned with the ethical and human rights principles established in the policies and guidelines framed within the companies' corporate governance.

Regarding the use of Artificial Intelligence, companies, their collaborators and third parties undertake to:

- Establish a clear governance and accountability framework for the development, implementation, and use of AI systems. This framework should consider best practices and be periodically updated based on evolving technologies, related risks, and applicable regulations.
- Promote the responsible use of artificial intelligence technologies, ensuring their implementation with appropriate security measures to protect the confidentiality, integrity, and availability of data.
- Embrace an organizational culture that promotes the trustworthy and beneficial use of AI by providing training and resources to its employees.
- Adopt technical and organizational measures to ensure the protection of personal data processed by AI systems, respecting individuals' right to privacy, including strict measures to prevent information leakage in artificial intelligence applications and ensuring that sensitive and confidential data is not exposed or misused. Data subjects shall have the right, at any time and without restriction, to obtain information about the processing of their personal data by data controllers. This includes details about the type of data processed, the purposes of the processing, the security measures implemented, and the rights of data subjects in relation to their personal data.

- Process personal data according to the principles of suitability, necessity, reasonableness, and proportionality to ensure that the data is used appropriately and without disproportionately affecting the rights of individuals.
- Comply with the principle of privacy by design and by default, ensuring that privacy and data protection are incorporated from the initial stages of AI systems development.
- Develop and operate all AI systems in compliance with applicable data protection and privacy laws and regulations, ensuring transparency about the use of AI in business processes.
- Conduct comprehensive impact assessments of AI systems to identify and mitigate potential risks, harms, and biases in data, algorithms, and outcomes, in order to avoid discrimination and unfair treatment.
- Identify and classify high-risk AI systems used in the organization (for example, in critical areas such as technological infrastructure, human management, judicial processes, etc.) and comply with the obligations established for these systems, such as risk assessment, privacy impact assessment, usage logging, human oversight, etc.
- Implement transparency mechanisms that allow users to clearly identify when they are interacting with or making decisions about content generated by AI systems, establishing processes to clearly label text, images, audio, video, and communications generated and/or manipulated by AI systems.
- Prohibit the use of AI applications that violate users' fundamental rights, such as biometric categorization systems based on sensitive characteristics, mass facial recognition, citizen rating systems, etc.
- Collaborate with relevant authorities and stakeholders to advance the establishment of best practices and regulatory frameworks around Artificial Intelligence.

5. AI GOVERNANCE

GRUPO ARGOS S.A. and its subsidiaries (Cementos Argos, Celsia, Odinsa, Summa) define the following organizational structure with entities, roles, and responsibilities to ensure proper compliance with the Artificial Intelligence policy.

AI Ethics and Governance Committee

- Review, approve, and monitor the use of AI
- Define the responsibilities and roles of the different departments and teams involved in the AI systems lifecycle (e.g., IT, Legal, Human Resources, Ethics/Compliance).
- Define a periodic review and update process for this policy, taking into account regulatory, technological, and best practice changes in the field of AI.
- Detail the measures that will be taken in case of non-compliance with the guidelines established in this policy.
- Establish the consequences and disciplinary sanctions applicable to serious violations.

AI Governance Officer: Responsible for overseeing the implementation and enforcement of AI policy.

Users: any collaborator, supplier, contractor, or other authorized third party who uses the companies' information in the execution of their daily work activities.

6. ANNEXES AND REFERENCES

- Artificial Intelligence Law – European Union Regulation
- Draft AI Bill of Rights – United States
- Cybersecurity Policies
- Personal Data Processing Policies – Applicable in the countries of influence of the business group
- National Policy for Digital Transformation and Artificial Intelligence (CONPES 3975) – Colombia
- External Circular 02 of 2024 – Superintendency of Industry and Commerce - Colombia
- Code of Conduct of the companies of the business group - GRUPO ARGOS S.A. and its subsidiary companies (Cementos Argos, Celsia, Odinsa, Summa)
- Artificial Intelligence Guidelines

7. POLICY REVIEW FREQUENCY

Every year or whenever required.

8. APPROVAL

Approval instance: AI Ethics and Governance Committee – Boards of Directors GRUPO ARGOS S.A. and its subsidiary companies (Cementos Argos, Celsia, Odinsa, Summa)

VERSION CONTROL

No. Rev.	Chapter	Date	Author	Description
V_001	All	April 2024	Cybersecurity Team	Draft - Initial Issue
V_002	All	July 2024	Cybersecurity Team	Shared in Cybersecurity committees
V_003	All	August 2024	Cybersecurity Team	Circular Recommendations Superintendency of Industry and Commerce
V_004	All	September 2024	Cybersecurity Team	Artificial Intelligence Guidelines