



INSIDER TRADING AND TRANSACTIONS WITH CEMEX SECURITIES POLICY

April 26, 2021

Proposed by:	Chief Executive Officer of CEMEX, S.A.B. de C.V.
Authorized by:	The Board of Directors of CEMEX, S.A.B. de C.V.



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I. POLICY STATEMENT

ARTICLE 1.- PURPOSE AND SCOPE.

Applicable securities laws and regulations prohibit the purchase or sale of securities by persons who are aware of material non-public information about a company, as well as the disclosure of material non-public information about a company to others who then trade in the company's securities. These transactions are commonly known as "insider trading."

Insider trading violations are heavily pursued and punished by securities regulators, including but not limited to the *Comisión Nacional Bancaria y de Valores* in Mexico (the "CNBV") and the United States Securities and Exchange Commission (the "SEC") and the U.S. Attorney Offices in the United States of America. While the regulatory authorities concentrate their efforts on individuals who trade, or who provide inside information to others who trade, applicable securities laws and regulations also impose potential liability on companies and other "controlling persons" if they fail to take reasonable steps to prevent insider trading by company employees.

The Board of Directors of CEMEX, S.A.B. de C.V. ("CEMEX") has adopted this Insider Trading and Transaction with CEMEX Securities Policy (as such may be amended, supplemented, modified and/or restated from time to time, the "Policy") with the intention to:

1. prevent insider trading and to provide guidance to all the members of the Board of Directors of CEMEX ("CEMEX BODM"), CEMEX's Senior Management (as defined below) and Employees (as defined below) of CEMEX and its consolidated Affiliates (together with CEMEX, the "CEMEX Group") to avoid the consequences associated with violations of insider trading laws;
2. prevent improper conduct, including the appearance of improper conduct, on the part of anyone employed by or associated with the CEMEX Group, not just so-called "Insiders";
3. follow and comply with the principles of transparency in the execution of operations, equal opportunities in the markets, protecting the confidence in the stock market, good observation of Stock Exchange practices, absence of conflicts of interest, and prevention of wrong behaviors; and
4. promote compliance with control and/or reporting mechanisms contemplated for the CEMEX BODM, CEMEX's Senior Management (as defined below) and Employees (as defined below) of the CEMEX Group when transacting with any securities issued by a CEMEX Group company, including procuring such compliance by a third party, when in possession of Material Non-Public Information (as defined below).



Please note that this Policy is not intended to be a complete description of applicable securities laws and regulations.

This Policy refers to an “Insider”, which is defined as:

- (a) CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management (as defined below) and CEMEX Group Employees (as defined below) that has access to Material Non-Public Information;
- (b) consultants to the CEMEX Group or other persons associated with the CEMEX Group, including distributors, sales agents or other partners that may, in the course of their work with the CEMEX Group, receive access to Material Non-Public Information (as defined below); and
- (c) household and immediate family members of those listed in (a) and (b) above.

A copy of this Policy is to be delivered or made available to all persons covered by items (a) and (b) above. Additionally, Insiders must alert persons covered by (c) above about the obligations of this Policy.

II. ROLES AND RESPONSIBLE PARTIES.-

ARTICLE 2.- CEMEX PARTIES INVOLVED.

The parties involved in the application, administration, and enforcement of this Policy are the following:

1. The Senior Vice President of Legal (or equivalent position) of CEMEX; and
2. CEMEX Corporate Compliance Department.

The CEMEX Corporate Compliance Department should be consulted for guidance regarding this Policy. The CEMEX Corporate Compliance Department may in turn seek the assistance of any other CEMEX Group internal or external legal advisor for further guidance.

III. POLICY.-

ARTICLE 3.- OTHER DEFINITIONS.

“CEMEX Corporate Compliance Department” refers to the legal Corporate Compliance of CEMEX’s Senior Legal Vice Presidency or any other department which may in the future exercise similar functions in relation to the matters covered herein.

“CEMEX Securities” refers to the shares, notes, debentures, bonds, warrants, certificates, promissory notes, bills of exchange, and other securities registered or not in



any registry, capable of circulating in an exchange, which are issued in series or in mass and represent CEMEX's capital stock, a proportional part of a good or the participation in a collective credit or any individual credit right, in the terms of applicable national or foreign laws.

Without limiting the foregoing, CEMEX Securities include, but are not limited to:

1. Any security issued by a CEMEX Group company that is registered or not in any registry, stock market, or Stock Exchange;
2. Deposit certificates commonly known as "American Depositary Receipts" ("ADRs") and/or Ordinary Participation Certificates ("CPOs") that have CEMEX Securities and underlying security, or other instruments similar to the securities registered in any registry, securities market, or Stock Exchange; and
3. Derivative financial instruments, provided that they have as their underlying asset securities registered in any registry, stock market, or Stock Exchange.

"CEMEX Securities Transactions" refer to those transactions involving CEMEX Securities carried out directly or indirectly by CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management, Employees, who, due to their functions in the CEMEX Group, may have access to Material Non-Public Information of the CEMEX Group.

"CEMEX Senior Management" refers to the senior management of the CEMEX Group as identified in CEMEX's annual reports filed with the SEC and the CNBV.

"Confidential Information" means information that CEMEX expressly classifies as such in its databases, submissions, documents, contracts, or agreements employed or submitted in the course of its business and/or that regulates the relationship with its customers or other parties or when it is classified as such in terms of the applicable legal provisions, in any event related to Securities registration processes in any registry, market or Stock Exchange, public offers, acquisitions or sale of CEMEX's own shares, as well as that which CEMEX would have qualified as confidential.

"Employees" means the individuals who occupy a position in or are directly or indirectly employed by any company of the CEMEX Group.

"Material Non-Public Information" means information, including Confidential Information, (i) in relation to which there is a substantial likelihood that a reasonable investor would consider the information to be important in making an investment decision or that the disclosure of such information would be viewed by a reasonable investor as having significantly altered the overall information available to the public on the corresponding subject matter or that such disclosure is reasonably certain to have a substantial effect on the market price of a security, which has not been disseminated in a manner making it available to all investors generally or that when disseminated sufficient time did not pass-by for the securities markets to digest the information, and/or (ii) that applicable laws



identifies as such. Information may be material even if it relates to future, speculative or contingent events and even if it is significant only when considered in combination with publicly available information. Such information can be positive or negative, and includes but is not limited to earnings announcements or estimates, or changes to previously released announcements or estimates; other unpublished financial results; write-downs and additions to reserves for bad debts; expansion or curtailment of operations; new products, inventions or discoveries; major litigation or government actions; mergers, acquisitions, tender offers, joint ventures or changes in assets; changes in analyst recommendations or debt ratings; events regarding a company's securities (e.g., defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits, changes in dividends, changes to the rights of security holders or public or private sales of additional securities); changes in control of a company or extraordinary management developments; extraordinary borrowing; liquidity problems; and changes in auditors or auditor notification that a company may no longer rely on an audit report. It is important to note that information is not necessarily public merely because it has been discussed in the press, which will sometimes report rumors. Information is nonpublic unless one can point to its official release by the CEMEX Group in at least one of the following ways: public filings with securities regulatory authorities; issuance of press releases; meetings with members of the press and the public that are simultaneously filed with securities authorities; or information contained in proxy statements and prospectuses.

"Material Public Information" means information that has been officially released by the CEMEX Group through a public filing with securities regulatory authorities; issuance of a press release; meetings with members of the press and the public that are simultaneously filed with securities authorities; or information contained in proxy statements and prospectuses that in relation to such information (i) there is a substantial likelihood that a reasonable investor would consider the information to be important in making an investment decision or that the disclosure of such information would be viewed by a reasonable investor as having significantly altered the overall information available to the public on the corresponding subject matter or that such disclosure is reasonably certain to have a substantial effect on the market price of a security and/or (ii) that applicable laws identifies as such. Bear in mind that in most cases the judicial or administrative courts are the ultimate decision-makers about whether something is or is not material under this test, and they usually judge these cases with the benefit of hindsight. Such information can be positive or negative, and includes but is not limited to earnings announcements or estimates, or changes to previously released announcements or estimates; other unpublished financial results; write-downs and additions to reserves for bad debts; expansion or curtailment of operations; new products, inventions or discoveries; major litigation or government actions; mergers, acquisitions, tender offers, joint ventures or changes in assets; changes in analyst recommendations or debt ratings; events regarding a company's securities (e.g., defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits, changes in dividends, changes to the rights of security holders or public or private sales of additional securities); changes in control of a company or extraordinary management developments; extraordinary borrowing; liquidity problems; and changes in auditors or auditor notification that a company may no longer rely on an audit report.

"Quiet Period" or "Black-Out Period" is defined as the period in which Trading of CEMEX Securities carried out directly or indirectly by CEMEX BODM, members of the Board of



Directors of any CEMEX Group company, CEMEX Senior Management and Employees is not permitted. Generally, this period begins on the earlier of any of these two situations:

1. the date set forth on a notification sent by the CEMEX Corporate Compliance Department or by the CEMEX Senior Vice President of Legal informing of the beginning of a Quiet Period or Black-Out Period, and ends on the date set forth on the corresponding notification sent by the CEMEX Corporate Compliance Department or by CEMEX Senior Vice President of Legal informing the end of a Quiet Period or Black-Out Period; or
2. ten (10) calendar days after the closing of each calendar quarter (March, June, September and December), and ends after the end of trading in the New York Stock Exchange and the Mexican Stock Exchange, which ever closes the latest, on the business day that follows the day the quarterly financial information of CEMEX or the relevant Material Non-Public Information becomes Material Public Information.

“Stock Compensation Plan” means any stock-based compensation plan implemented by CEMEX to eligible participants.

“Stock Exchange” means *Bolsa Mexicana de Valores, S.A.B. de C.V.* and/or the New York Stock Exchange, and/or any stock exchange or market, in Mexico, the U.S. or outside of Mexico and the U.S., in which any CEMEX Securities are listed at any given time, including but not limited to debt CEMEX Securities listed in the Irish Stock Exchange plc on which senior secured notes and other securities of any company of the CEMEX Group are listed on.

“Trading” includes the purchase and sale of CEMEX Securities or securities of any third-party. This Policy includes trades made pursuant to any investment direction under employee benefit plans as well as trades in the open market. This Policy also applies to the exercise of options with an immediate sale of some or all the shares through a broker (“a cashless exercise”).

ARTICLE 4.- INTERPRETATION.

When in doubt as to the content or application of this Policy, all persons subject to the scope of this Policy have an obligation to contact the CEMEX Corporate Compliance Department for guidance. The CEMEX Corporate Compliance Department will have the ultimate responsibility for the interpretation of this Policy after consulting with the Senior Vice President of Legal at CEMEX and, if necessary, with internal and/or external legal counsel, provided any services from external legal counsel are previously duly authorized by the CEMEX Senior Vice President of Legal or the CEMEX CFO.

When in doubt as to any requirement or formality to be complied by any person subject to this Policy as it relates to CEMEX Securities Transactions, in particular regarding Trading with CEMEX Securities, such person shall hire its own legal advisors or consultants at such person’s own expense and ensure that such person complies with all applicable laws



and regulations. CEMEX Senior Vice President of Legal may provide or may authorize for any members of the CEMEX Corporate Compliance Department to provide guidance to any such person, without any liability to any CEMEX Group Company.

IV. TRANSACTIONS WITH CEMEX SECURITIES. -

ARTICLE 5.- COMPLIANCE.

Any CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member and Employee, are fully responsible for ensuring that he or she does not violate any securities laws, regulations or any applicable CEMEX Group policy concerning securities trading in general. Every CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management and Employee, is equally responsible for compliance with this Policy by their immediate family members and any other persons with whom they reside, to whom they provide material financial support to or have a close relation with.

ARTICLE 6.- GENERAL TRADING RESTRICTIONS.

Unless this Policy provides for an exception, any CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member, and Employee shall not:

1. Carry out any CEMEX Securities Transaction when in possession of Material Non-Public Information;
2. Carry out any CEMEX Securities Transaction during a Quiet Period or Black-Out Period; or
3. After carrying out a CEMEX Securities Transaction (acquisition or sale), execute an opposite CEMEX Securities Transaction (sale or acquisition, as applicable) within a period of 3 (three) months from the corresponding CEMEX Securities Transaction.

Additionally, unless this Policy provides for an exception, any CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member and Employee, when in possession of Material Non-Public Information, may only sell or buy CEMEX Securities under any Stock Compensation Plan, or from CEMEX, directly or indirectly, that any CEMEX Group company offers to acquire or place, by means of a public offer.

ARTICLE 7.- TRADING PROHIBITION WHEN IN POSSESSION OF MATERIAL NON-PUBLIC INFORMATION.

Until any Material Non-Public Information becomes Material Public Information, any CEMEX BODM, members of the Board of Directors of any CEMEX Group company,



CEMEX Senior Management member and Employee with knowledge of such Material Non-Public Information may NOT Trade in CEMEX Securities. In addition, if any CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member and Employee obtains Material Non-Public Information concerning another company, including news of a possible transaction between that company and any company of the CEMEX Group, such CEMEX BODM, members of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member and Employee, respectively, may not Trade in that other company's securities.

Even after the Material Non-Public Information has been disclosed, the corresponding CEMEX BODM, member of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member and/or Employee that was in possession of such Material Non-Public Information, respectively, must wait until sufficient time (one calendar day) before Trading in CEMEX Securities or such other company's securities, in order to allow the market to digest the information.

ARTICLE 8.- STOCK COMPENSATION PLANS.

Under the Mexican Securities Market Law (*Ley del Mercado de Valores*), any person that has rights to acquire CEMEX Securities under the terms and conditions of any Stock Compensation Plan, may instruct the sale of said CEMEX Securities, granted and released from any restriction through the aforementioned Stock Compensation Plan, without violating the provisions of this Policy, as long as they meet the following conditions:

1. That the instruction to transfer the corresponding CEMEX Securities released from any restriction, is formalized or notified to the corresponding plan administrator within 10 (ten) business days following the date of release of any restriction of the CEMEX Securities granted under the Stock Compensation Plan, with the understanding that said term will be suspended when CEMEX declares a Quiet Period or a Black-Out Period, and once such Quiet Period or Black-Out Period has concluded, the computation of the working days of the aforementioned period will continue; and
2. That the corresponding CEMEX BODM, member of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member and Employee have not acquired CEMEX Securities, directly or indirectly, during a period of 3 (three) months prior to the date in which the instruction to the plan's administrator to dispose of the CEMEX Securities referred to in the previous paragraph plan is formalized or notified.

ARTICLE 9.- INTERNAL DISCLOSURE OBLIGATIONS.

CEMEX BODM, members of the Board of Directors of any CEMEX Group company, any CEMEX Senior Management member and Employee, must provide reports each time they carry out a CEMEX Security Transaction when they have access to Confidential



Information or Material Non-Public Information. This report must be sent to the CEMEX Senior Vice President of Legal, (or person holding the equivalent position), within 10 (ten) business days following the conclusion of the operation in question and be completed; the report must include the details of the CEMEX Security Transaction (type of CEMEX Securities involved in the transaction, date executed, monetary amounts involved and known parties involved in the CEMEX Securities Transaction).

ARTICLE 10.- CERTAIN REPORTING REQUIREMENTS.

Under the Mexican Securities Market Law, CEMEX BODM and any CEMEX Senior Management member will have, in addition to any other obligation contained in this Policy and/or required by applicable laws and regulations, the following obligations:

1. Obligation to inform the CNBV about any CEMEX Securities Transaction carried out during a calendar quarter within 5 (five) business days after the end of each quarter, provided that the total amount operated within said period is equal to or greater than 1,000,000 UDIs, considering the value of the UDI at the end of the relevant quarter;
2. Obligation to inform the CNBV of the sales or acquisitions of CEMEX Securities made within a period of 5 (five) business days, for an amount equal to or greater than 1,000,000 UDIs, considering the value of the UDI on the day of the last CEMEX Security Transaction, on the business day following the date on which such amount is reached; and
3. Obligation to inform the CEMEX Corporate Compliance Department no later than the 15th (fifteenth) day of May of each year, the number, series, and class of the CEMEX Securities in which they are owners or beneficiaries, directly or indirectly, as well as the amount and percentage they represent with respect to CEMEX's capital stock (when such CEMEX Security represents a percentage of CEMEX's outstanding capital stock), through the form attached hereto as Exhibit A.

Under U.S. securities laws and regulations:

1. If a CEMEX BODM or Senior Management member is a resident of the United States of America or has an account with a brokerage firm, bank or broker in such country, the corresponding CEMEX BODM or Senior Management member is required to file Form 144 (attached herein as Exhibit B) with the SEC in case that it sells more than 5,000 CEMEX Securities or if the sale of CEMEX Securities exceeds U.S.\$50,000 over a period of 3 (three) months.

ARTICLE 11.- INTERNAL CONTROL MECHANISMS.

A control mechanism has been implemented where certain information must be provided by any CEMEX BODM, CEMEX Senior Manager and Employees to the CEMEX Corporate Compliance Department in order to maintain a record of the people who have access to Confidential Information and Material Non-Public Information (the "Information Control").



The Information Control has the objective of identifying and limiting access to Material Non-Public Information. Therefore, the Information Control requests and records:

1. Description of the Material Non-Public Information or the Confidential Information;
2. Date on which the Material Non-Public Information or the Confidential Information became known to the person providing the information to the CEMEX Corporate Compliance Department;
3. Country in which the person providing the information to the CEMEX Corporate Compliance Department resides;
4. Attachments (if applicable) of documents that contain the Material Non-Public Information or the Confidential Information;
5. Description of the documents accessed or consulted that contain the Material Non-Public Information or the Confidential Information;
6. Job title of the person providing the information to the CEMEX Corporate Compliance Department; and
7. Names of other persons who had knowledge of the corresponding Material Non-Public Information or Confidential Information being reported.

A sample format is attached to this Policy as Exhibit C¹.

Except as provided for at the end of this paragraph, it is the responsibility of each CEMEX BODM, CEMEX Senior Manager and/or Employee gaining access to Material Non-Public Information or Confidential Information to provide the information described above in the Information Control to the CEMEX Corporate Compliance Department promptly upon gaining access to the corresponding Material Non-Public Information or Confidential Information and for the CEMEX Corporate Compliance Department to register such information in the Information Control document. Regarding any information received by CEMEX BODM in connection with any CEMEX Board of Directors meetings and CEMEX Board Committee meetings, including any information sent previously to these meetings as part of the materials distributed and to be discussed in these meetings, the CEMEX Senior Vice President of Legal (or any person with the equivalent title) shall be responsible for arranging for registering the corresponding information in the Information Control document.

The Information Control will be available to the CNBV and will be retained, as applicable, for a period of 5 (five) years as of the date that such Material Non-Public Information becomes Material Public Information, 5 years after the report was submitted to the CEMEX Corporate Compliance Department if such Material Non-Public Information never became Material Public Information, or the date in which the Confidential Information was

¹ To complete the Information Control, please access the following link:
https://forms.office.com/Pages/ResponsePage.aspx?id=AZDhbsTQ-EWvi_8A8W0H4RvzmsqEkk9LvcXGCgyqSU9UMUxFOVIYRlpYMIIOVUFLUE1EQjI0RFgyWC4u



generated or obtained by CEMEX or the corresponding CEMEX BODM, CEMEX Senior Manager or Employee.

The Information Control will be under the responsibility of the CEMEX Corporate Compliance Department.

The procedures for the effective control of access to Material Non-Public Information and the Confidential Information must ensure the following:

1. Allow access to Material Non-Public Information or Confidential Information only to those CEMEX BODM, CEMEX Senior Managers and Employees, who, due to the nature of their position or employment, find its knowledge essential;
2. A separation and control are kept with regards to the access of archives that contains Material Non-Public Information or Confidential Information pertaining to CEMEX's processes, substantive or business areas; and
3. Updating programs of the Code of Ethics, the Use and Management of Privileged Information Policy (or equivalent policy) and other related policies, including the CEMEX BODM manual (or equivalent document).

ARTICLE 12.- DISCLOSURE OF INFORMATION: HANDLING OF MATERIALNON-PUBLIC INFORMATION.

Any Insider has the obligation to handle any Material Non-Public Information in a secure and discrete manner.

Every Insider who is in possession of the Material Non-Public Information is prohibited from sharing or communicating that information to anybody unless authorized in writing by his/her supervisor.

Unless otherwise permitted as per this Policy, every Insider who is in possession of the Material Non-Public Information must abstain from Trading in CEMEX Securities.

Each person covered by the scope of this Policy should remember that the ultimate responsibility for adhering to this Policy and avoiding improper Trading rests with him or herself. In this regard, it is important that each person covered by this Policy uses his or her best judgment and seeks guidance from the CEMEX Corporate Compliance Department whenever in doubt. No CEMEX Group company is responsible for any person's non-compliance with this Policy.

There may be situations in which disclosure of Material Non-Public Information is required. As examples, this may be the case when such disclosure is done pursuant to a requirement of law or an order from a competent authority, or in order to obtain advice from a specialized professional for the evaluation of a business opportunity, among other cases. In any such case, in addition to obtaining any authorizations described in this Policy



to share any Material Non-Public Information, an Insider shall, before disclosing any Material Non-Public Information, make reasonable efforts to obtain reasonable assurance that the recipient of the Material Non-Public Information intends to act in such a manner that is not inconsistent with this Policy, its own securities transactions policies, and/or applicable laws and regulations. Such reasonable assurance may be in the form of, but is not limited to the assumption of a non-disclosure and non-use obligation in the relevant agreement, engagement letter, etc.

Selective disclosure of Material Nonpublic Information must be avoided. CEMEX has established procedures for releasing material information in a manner that is designed to achieve broad public dissemination of the information immediately upon its release. Any CEMEX BODM, member of the Board of Directors of any CEMEX Group company, CEMEX Senior Management member and Employee who inadvertently disclose any Material Nonpublic Information must immediately advise the CEMEX Corporate Compliance Department so that CEMEX can assess its obligations under applicable securities laws.

ARTICLE 13.- QUIET PERIODS.

Because of the sensitivity to quarterly earnings results, CEMEX instituted Quiet Periods during which CEMEX BODM, any member of the Board of Directors of any CEMEX Group company, CEMEX Senior Management and/or Employees may not trade in CEMEX Group securities ten (10) calendar days after the closing of each calendar quarter (March, June, September and December), and ends after the end of trading in the New York Stock Exchange and the Mexican Stock Exchange, which ever closes the latest, on the business day that follows the day the quarterly financial information of CEMEX or the relevant Material Non-Public Information becomes Material Public Information.

If an additional Quiet Period is declared, this will be communicated directly to you through the CEMEX Corporate Compliance Department or by the CEMEX Senior Vice President of Legal (or person holding the equivalent position).

V. POLICY AMENDMENTS.

ARTICLE 14.- UPDATES AND AMENDMENTS.

The Board of Directors of CEMEX delegate the authority to amend and update this Policy to the CEMEX Senior Vice President of Legal (or any person with the equivalent title), only when such amendment or update is required to clarify any interpretations of this Policy, implement changes to the content of any Annex, reflect changes in the process and methodology to comply with this Policy, and to incorporate any updates required by changes in applicable laws or regulations, provided that any such amendment or update is not contrary to the current terms of this Policy.



VI. NON-COMPLIANCE. –

ARTICLE 15. – NON-COMPLIANCE AND CONSEQUENCES.

Violation of this Policy, or the making of any commitment in violation of this Policy, will result in disciplinary action, which may include termination of employment at the CEMEX Group, in addition to any other legal actions available to the CEMEX Group against the person who violated this Policy.

VII. CAUTIONARY STATEMENT. –

ARTICLE 16. – CAUTIONARY STATEMENT AND WARNINGS.

This Policy is not intended to be a complete description of applicable securities laws and regulations, and compliance with this Policy does not ensure that compliance with applicable securities laws and regulations will follow. You must err on the side of caution, as securities laws and regulations are strict and may contain certain provisions or presumptions that may cause inadvertent non-compliance and/or put a CEMEX BODM, member of the Board of Directors of any CEMEX Group company, CEMEX Senior Manager or Employee in a position where compliance with such laws and regulations would be required to be evidenced.



EXHIBITS CONTAINED IN FOLLOWING PAGES



EXHIBIT A
MEXICAN SECURITIES EXCHANGE COMMISSION FORM
REPORTE DE OPERACIONES CELEBRADAS CON VALORES OBJETO DE REVELACIÓN

NOMBRE DE LA EMISORA/ NAME OF THE ISSUER
CEMEX, S.A.B. DE C.V.

DATOS PERSONALES PERSONA FÍSICA/ NAME OF THE PERSON		
APELLIDO PATERNO/ PATERNAL SURNAME	APELLIDO MATERNO/ MATERNAL SURNAME	NOMBRE(S)/ NAME(S)
VÍNCULO CON LA EMISORA/ RELATION TO THE ISSUER (artículo 111 de la Ley del Mercado de Valores)		
a) Persona que tenga 10% o más/ <i>Holder of 10% of all outstanding shares or more</i>	<input type="checkbox"/>	c) Miembro del Consejo de Administración/ <i>Member of the Board of Directors</i>
b) Grupo de personas que tenga el 10% o más/ <i>Group of persons that hold 10% of all outstanding shares or more</i>	<input type="checkbox"/>	d) Directivo relevante/ <i>Relevant Officer</i>
		<input type="checkbox"/>

OPERACIONES CELEBRADAS/ TRANSACTIONS				
VALOR/ SECURITY (CPOs o ADRs)/ (CPOs or ADRs)	TIPO/ TYPE (Enajenación o adquisición)/ (Purchase or Sale)	FECHA DE CONCERTACIÓN/ TRANSACTION DATE	VOLUMEN/ QUANTITY	PRECIO/ PRICE

FECHA DE ENTREGA DE INFORMACIÓN A CNBV/ DATE OF FILING

Domicilio para recibir notificaciones de la persona de que se trate o del representante autorizado. / <i>Address of the aforementioned person or its representative to receive notifications.</i>
Teléfono/ <i>Telephone number.</i>

El suscrito, bajo protesta de decir verdad, manifiesta que la información y datos contenidos en el presente documento son verdaderos. / *The undersigned, under oath to tell the truth, hereby declares that the information and data contained herein is true.*

NOMBRE COMPLETO Y FIRMA/ NAME AND SIGNATURE: _____



EXHIBIT B
U.S. SECURITIES AND EXCHANGE COMMISSION FORM 144

UNITED STATES
 SECURITIES AND EXCHANGE COMMISSION
 Washington, D.C. 20549

FORM 144
NOTICE OF PROPOSED SALE OF SECURITIES
PURSUANT TO RULE 144 UNDER THE SECURITIES ACT OF 1933

OMB APPROVAL	
OMB Number:	3235-0101
Expires:	February 28, 2014
Estimated average burden hours per response	1.00
SEC USE ONLY	
DOCUMENT SEQUENCE NO.	
CUSIP NUMBER	
WORK LOCATION	

ATTENTION: Transmit for filing 3 copies of this form concurrently with either placing an order with a broker to execute sale or executing a sale directly with a market maker.

1 (a) NAME OF ISSUER (Please type or print)		(b) IRS IDENT. NO.	(c) S.E.C. FILE NO.	WORK LOCATION	
1 (d) ADDRESS OF ISSUER		STREET	CITY	STATE	ZIP CODE
				(e) TELEPHONE NO.	
		AREA CODE	NUMBER		
2 (a) NAME OF PERSON FOR WHOSE ACCOUNT THE SECURITIES ARE TO BE SOLD		(b) RELATIONSHIP TO ISSUER	(c) ADDRESS STREET	CITY	STATE ZIP CODE

INSTRUCTION: The person filing this notice should contact the issuer to obtain the I.R.S. Identification Number and the S.E.C. File Number.

3 (a) Title of the Class of Securities To Be Sold	(b) Name and Address of Each Broker Through Whom the Securities are to be Offered or Each Market Maker who is Acquiring the Securities	SEC USE ONLY		(c) Number of Shares or Other Units To Be Sold <i>(See instr. 3(c))</i>	(d) Aggregate Market Value <i>(See instr. 3(d))</i>	(e) Number of Shares or Other Units Outstanding <i>(See instr. 3(e))</i>	(f) Approximate Date of Sale <i>(See instr. 3(f))</i> (MO. DAY. YR.)	(g) Name of Each Securities Exchange <i>(See instr. 3(g))</i>
		Broker-Dealer File Number						

INSTRUCTIONS:

- | | |
|--|---|
| <p>1. (a) Name of issuer
 (b) Issuer's I.R.S. Identification Number
 (c) Issuer's S.E.C. file number, if any
 (d) Issuer's address, including zip code
 (e) Issuer's telephone number, including area code</p> <p>2. (a) Name of person for whose account the securities are to be sold
 (b) Such person's relationship to the issuer (e.g., officer, director, 10% stockholder, or member of immediate family of any of the foregoing)
 (c) Such person's address, including zip code</p> | <p>3. (a) Title of the class of securities to be sold
 (b) Name and address of each broker through whom the securities are intended to be sold
 (c) Number of shares or other units to be sold (if debt securities, give the aggregate face amount)
 (d) Aggregate market value of the securities to be sold as of a specified date within 10 days prior to the filing of this notice
 (e) Number of shares or other units of the class outstanding, or if debt securities the face amount thereof outstanding, as shown by the most recent report or statement published by the issuer
 (f) Approximate date on which the securities are to be sold
 (g) Name of each securities exchange, if any, on which the securities are intended to be sold</p> |
|--|---|

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

SEC 1147 (08-07)



TABLE I — SECURITIES TO BE SOLD

Furnish the following information with respect to the acquisition of the securities to be sold and with respect to the payment of all or any part of the purchase price or other consideration therefor:

Title of the Class	Date you Acquired	Nature of Acquisition Transaction	Name of Person from Whom Acquired <i>(If gift, also give date donor acquired)</i>	Amount of Securities Acquired	Date of Payment	Nature of Payment

INSTRUCTIONS: If the securities were purchased and full payment therefor was not made in cash at the time of purchase, explain in the table or in a note thereto the nature of the consideration given. If the consideration consisted of any note or other obligation, or if payment was made in installments describe the arrangement and state when the note or other obligation was discharged in full or the last installment paid.

TABLE II — SECURITIES SOLD DURING THE PAST 3 MONTHS

Furnish the following information as to all securities of the issuer sold during the past 3 months by the person for whose account the securities are to be sold.

Name and Address of Seller	Title of Securities Sold	Date of Sale	Amount of Securities Sold	Gross Proceeds

REMARKS:

INSTRUCTIONS:

See the definition of "person" in paragraph (a) of Rule 144. Information is to be given not only as to the person for whose account the securities are to be sold but also as to all other persons included in that definition. In addition, information shall be given as to sales by all persons whose sales are required by paragraph (e) of Rule 144 to be aggregated with sales for the account of the person filing this notice.

ATTENTION:

The person for whose account the securities to which this notice relates are to be sold hereby represents by signing this notice that he does not know any material adverse information in regard to the current and prospective operations of the Issuer of the securities to be sold which has not been publicly disclosed. If such person has adopted a written trading plan or given trading instructions to satisfy Rule 10b5-1 under the Exchange Act, by signing the form and indicating the date that the plan was adopted or the instruction given, that person makes such representation as of the plan adoption or instruction date.

DATE OF NOTICE

DATE OF PLAN ADOPTION OR GIVING OF INSTRUCTION,
IF RELYING ON RULE 10b5-1

(SIGNATURE)

The notice shall be signed by the person for whose account the securities are to be sold. At least one copy of the notice shall be manually signed. Any copies not manually signed shall bear typed or printed signatures.

ATTENTION: Intentional misstatements or omission of facts constitute Federal Criminal Violations (See 18 U.S.C. 1001)

SEC 1147 (02-08)



**EXHIBIT C
DISCLOSURE FORMAT**

Insider Trading and Transactions with CEMEX Securities Policy Information Control (Preview) Microsoft Forms

4/6/21, 4:40 PM

Insider Trading and Transactions with CEMEX Securities Policy Information Control

Control de Información de la Política sobre Uso de Información Privilegiada en Transacciones
con Valores de CEMEX

* Required

1. Full Name / Nombre Completo (Required / Obligatorio) *

2. Description of the Material Non-Public Information or the Confidential Information / Descripción de la Información Material No Pública o Información Confidencial (Required / Obligatorio) *

3. Date on which the Material Non-Public Information or the Confidential Information became known to the person providing the information to the CEMEX Corporate Compliance Department / Fecha en la que dicha Información Material No Pública o Información Confidencial fue conocida por la persona que proporciona la información al Departamento de Cumplimiento Corporativo de CEMEX (Required / Obligatorio) *

4. Country in which the person providing the information to the CEMEX Corporate Compliance Department resides / País en el que reside la persona que proporciona la información al Departamento de Cumplimiento Corporativo de CEMEX (Required / Obligatorio) *

5. Attachments (if applicable) of documents that contain the Material Non-Public Information or the Confidential Information / Adjuntar (de ser aplicable) los documentos que contienen la Información Material No Pública o Información Confidencial.

 Upload file

File number limit: 10 Single file size limit: 10MB Allowed file types: Word, Excel, PPT, PDF, Image, Video, Audio

6. Description of the documents accessed or consulted that contain the Material Non-Public Information or the Confidential Information / Descripción de los documentos a los que se tuvo acceso o que fueron consultados que contienen la Información Material No Pública o Información Confidencial (Required / Obligatorio) *

7. Job title of the person providing the information to the CEMEX Corporate Compliance Department / El puesto de la persona que proporciona la información al Departamento de Cumplimiento Corporativo de CEMEX (Required / Obligatorio) *

8. Names of other persons who had knowledge of the corresponding Material Non-Public Information or Confidential Information being reported / Nombre de las otras personas que hayan tenido conocimiento de Información Material No Pública o Información Confidencial que está siendo reportada (Required / Obligatorio) *

4/6/2021

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