

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION**

DAN KOHL, *et al.*,

Plaintiff,

v.

LOMA NEGRA COMPANIA INDUSTRIAL
ARGENTINA SOCIEDAD ANONIMA, LOMA
NEGRA HOLDING GMBH, SERGIO FAIFMAN,
MARCO GRADIN, RICARDO FONSECA DE
MENDONÇA LIMA, LUIZ AUGUSTO KLECZ,
PAULO DINIZ, CARLOS BOERO HUGHES,
DIANA MONDINO, SERGIO DANIEL ALONSO,
BRADESCO SECURITIES INC., CITIGROUP
GLOBAL MARKETS INC., HSBC SECURITIES
(USA) INC., ITAU BBA USA SECURITIES, INC.,
MERRILL LYNCH, PIERCE, FENNER & SMITH
INCORPORATED AND MORGAN STANLEY &
CO. LLC,

Defendants.

Index No. 653114/2018
Part 53

Hon. Andrew Borrok

**AFFIRMATION OF ANN CAVANAUGH REGARDING CLASS NOTICE AND
REPORT ON OBJECTIONS AND REQUESTS FOR EXCLUSION RECEIVED**

I, ANN CAVANAUGH, hereby affirm under penalty of perjury as follows:

1. I am a Project Manager of A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”). The following statements are based on my personal knowledge and information provided by other A.B. Data employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

2. Pursuant to its Order Preliminarily Approving Settlement and Providing For Notice dated November 30, 2023 (the “Preliminary Approval Order”), the Court approved the retention

of A.B. Data as the Claims Administrator for the above-captioned action (the “Action”).¹ I submit this Declaration to provide the Court with proof of the mailing of the Court-approved Notice and Proof of Claim and Release (the “Claim Form,” and together with the Notice, the “Notice Package”), the publication of the Summary Notice, and to report on the requests for exclusion from the Class in connection with dissemination of the Notice Package.

MAILING OF THE NOTICE AND CLAIM FORM

3. Pursuant to the Preliminary Approval Order, A.B. Data was responsible for mailing the Notice Package to potential Class Members and nominees. A copy of the Notice Package is attached to this Declaration as Exhibit A.

4. In connection with the Court’s Order Granting Plaintiff’s Motion to Certify Class, Appoint Class Representative, and Appoint Class Counsel (the “Certification Order”), A.B. Data was responsible for implementing the class certification Notice Procedure. As part of the class certification Notice Procedure, from late January through April 2022 and beyond, A.B. Data received the names and contact information of 9,015 potential Class Members and their nominees.

5. Using the names and contact information obtained in connection with the class certification Notice Procedure, on December 21, 2023, A.B. Data caused the Notice Package to be sent by First-Class Mail to the 9,015 potential Class Members. Prior to mailing, A.B. Data performed address research using the United States Postal Services (“USPS”) National Change of Address (“NCOA”) database and updated the mailing records accordingly.

6. As in most class actions of this nature, the large majority of potential Class Members are beneficial purchasers whose securities are held in “street name” – *i.e.*, the securities

¹ Unless otherwise defined in this Declaration, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated October 11, 2023 (the “Stipulation”).

are purchased by brokerage firms, banks, institutions, and other third-party nominees in the names of the respective nominees, on behalf of the beneficial purchasers. A.B. Data maintains a proprietary database with names and addresses of the largest and most common banks, brokers, and other nominees (the “Record Holder Mailing Database”). A.B. Data’s Record Holder Mailing Database is updated from time to time as new nominees are identified and others go out of business. On December 21, 2023, the Record Holder Mailing Database contained 4,967 mailing records. That same day, A.B. Data caused the Notice Package to be sent by First-Class Mail to the 4,967 addresses whose mailing records were contained in the Record Holder Mailing Database.

7. In total, 13,982 Notice Packages were mailed to potential Class Members and their nominees by First-Class Mail on December 21, 2023.

8. On December 21, 2023, A.B. Data submitted the Notice Package to The Depository Trust Company (“DTC”) to post on its Legal Notice System, which offers DTC member banks and brokers access to a comprehensive library of notices concerning DTC-eligible securities.

9. The Notice directed those who purchased or acquired Loma Negra Compañía Industrial Argentina Sociedad Anonima (“Loma”) American Depositary Shares (“ADSs”) between November 1, 2017, and June 21, 2018, inclusive, as a nominee for a beneficial owner to, within fourteen (14) business days of receipt of the Notice, either send a copy of the Notice Package by First-Class Mail to such beneficial owners or provide to A.B. Data a list of names and addresses of such Persons.

10. Through the date of this Declaration, A.B. Data has received an additional 952 names and addresses of potential Class Members from individuals or brokerage firms, banks, institutions, and other nominees. A.B. Data has also received requests from brokers and other nominee holders for 5,820 Notice Packages to be forwarded directly by the nominees to their

customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

11. Through the date of this Declaration, a total of 20,754 Notice Packages have been disseminated to potential members of the Class or their nominees. In addition, A.B. Data has remailed 792 Notice Packages to persons and entities whose original mailings were returned by the U.S. Postal Service (“USPS”) and for which updated addresses were provided to A.B. Data or obtained through a third-party vendor.

PUBLICATION OF THE SUMMARY NOTICE

12. Pursuant to the Preliminary Approval Order, A.B. Data caused the Summary Notice to be published over *PR Newswire* on December 29, 2023. Proof of this publication of the Summary Notice is attached hereto as Exhibit B.

WEBSITE

13. On January 31, 2022, as part of the class certification Notice Procedure, A.B. Data established a website designated for the Action (www.LomaNegraSecuritiesLitigation.com). In compliance with the Preliminary Approval Order, the website was updated on December 21, 2023 to include information regarding the proposed Settlement, including the exclusion, objection, and claim filing deadlines, and the date, time, and location of the Court’s Settlement Hearing. Copies of the Notice, Claim Form, Stipulation, Preliminary Approval Order, and other documents related to the Action are posted on the website and are available for downloading. In addition, the website includes the ability to file a claim online and a link to a document with detailed instructions for Class Members submitting their claims electronically. Further, the website has contact information

for A.B. Data and Lead Counsel, including a toll-free telephone number, that Class Members can use to obtain additional information. The website is accessible 24 hours per day, 7 days a week.

TOLL-FREE TELEPHONE LINE

14. On January 31, 2022, as part of the class certification Notice Procedure, A.B. Data established and continues to maintain a case-specific, toll-free telephone helpline, 1-877-311-3744, with an interactive voice response system and live operators, to accommodate potential Class Members with questions about the Action. Callers requiring further help have had the option to be transferred to a live operator during business hours.

REPORT ON OBJECTIONS AND REQUESTS FOR EXCLUSION

15. The Notice informed potential Class Members that requests for exclusion from the Class are to be mailed to the Claims Administrator postmarked (for U.S. Mail) or received by the private carrier (for FedEx, UPS, etc.) no later than March 20, 2024. The Notice also set forth the information that was required to be included in each request for exclusion.

16. As part of the class certification Notice Procedure, A.B. Data received three (3) requests for exclusion. All three requests were received from individual investors. The three requests represent 222,849 shares. One of the three requests for exclusion, representing 220,849 shares, was by Sergio Damian Faifman (*see* NYSCEF No. 169, at 24), who counsel informs me was and is the CEO of Loma and a named Defendant in this Action and, thus, does not fall within the Class definition. A.B. Data has not received any additional requests for exclusion. A.B. Data will submit a supplemental affirmation after the March 20, 2024, exclusion deadline addressing any additional requests for exclusion received.

17. According to the Notice, Class Members seeking to object to the proposed Settlement are required to submit their objection in writing such that the request is postmarked or

received with the Court no later than March 20, 2024. Although Class Members were not required to send objections to A.B. Data, A.B. Data has not received any misdirected objections.

18. During the claims administration process, A.B. Data will review and process all Claims received, will provide Claimants with an opportunity to cure any deficiency or request judicial review of the denial of their Claims, if applicable, and will ultimately mail or wire Authorized Claimants their *pro rata* share of the Net Settlement Fund, as calculated under the Plan of Allocation.

I affirm this 5th day of March, 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true and correct to the best of my knowledge, and I understand that this document may be filed in an action or proceeding in a court of law.



Ann Cavanaugh

PRINTING SPECIFICATIONS STATEMENT

1. Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing memorandum of law was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman
Point Size: 12
Line Spacing: Double

2. The total number of words in the memorandum, inclusive of point headings and footnotes and exclusive of the caption, signature block, and this Certification, is 1,422 words.

DATED: March 6, 2024

Respectfully submitted,

LEVI & KORSINSKY, LLP

/s/ Shannon L. Hopkins
LEVI & KORSINSKY, LLP
Shannon L. Hopkins
Andrew E. Lencyk
33 Whitehall St., 17th Floor
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Telephone: (212) 363-7500

*Lead Counsel for the Class and Attorneys for
Plaintiff Dan Kohl*

EXHIBIT A

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION**

DAN KOHL, *et al.*,

Plaintiff,

v.

LOMA NEGRA COMPANIA INDUSTRIAL ARGENTINA SOCIEDAD ANONIMA, LOMA NEGRA HOLDING GMBH, SERGIO FAIFMAN, MARCO GRADIN, RICARDO FONSECA DE MENDONÇA LIMA, LUIZ AUGUSTO KLECZ, PAULO DINIZ, CARLOS BOERO HUGHES, DIANA MONDINO, SERGIO DANIEL ALONSO, BRADESCO SECURITIES INC., CITIGROUP GLOBAL MARKETS INC., HSBC SECURITIES (USA) INC., ITAU BBA USA SECURITIES, INC., MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED AND MORGAN STANLEY & CO. LLC,

Defendants.

Index No. 653114/2018

Part 53

Hon. Andrew Borrok

NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION¹

TO: ALL PERSONS OR ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED AMERICAN DEPOSITORY SHARES OF LOMA NEGRA COMPAÑÍA INDUSTRIAL ARGENTINA SOCIEDAD ANONIMA (“LOMA” OR THE “COMPANY”) PURSUANT OR TRACEABLE TO THE REGISTRATION STATEMENT AND PROSPECTUS ISSUED BY LOMA IN CONNECTION WITH ITS NOVEMBER 2017 INITIAL PUBLIC OFFERING (“IPO”) (THE “SETTLEMENT CLASS”² OR “SETTLEMENT CLASS MEMBERS”), AND WHO ARE NOT OTHERWISE EXCLUDED FROM THE SETTLEMENT CLASS (SEE PAGE 5 BELOW). YOU COULD RECEIVE A PAYMENT FROM A CLASS ACTION SETTLEMENT.

¹ This Notice incorporates by reference the definitions in the Stipulation of Settlement dated October 11, 2023 (the “Stipulation”). Unless otherwise defined herein, all capitalized terms shall maintain the same meaning as those set forth in the Stipulation. The Stipulation can be obtained at www.LomaNegraSecuritiesLitigation.com.

² On December 2, 2021, the Court certified a class of all persons and entities who purchased or otherwise acquired Loma’s American Depository Shares pursuant and/or traceable to the Registration Statement and Prospectus incorporated therein, as amended, issued by Loma in connection with its November 2017 IPO. The December 2, 2021, Order excludes from the Class all Defendants and their families, the officers, directors, and affiliates of Defendants, members of their immediate families and their legal representatives, heirs, successors, or assigns, and any entity in which Defendants have or had a majority ownership interest, unless excluded by the terms of the Stipulation.

IN ORDER TO QUALIFY FOR A SETTLEMENT PAYMENT, YOU MUST TIMELY SUBMIT A PROOF OF CLAIM AND RELEASE FORM (“PROOF OF CLAIM”) BY APRIL 19, 2024.

THIS NOTICE WAS AUTHORIZED BY THE COURT AND EXPLAINS IMPORTANT RIGHTS YOU MAY HAVE. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

WHY SHOULD I READ THIS NOTICE?

- This Notice is given pursuant to an order issued by the Supreme Court of the State of New York, County of New York: Commercial Division (the “Court”).
- This Notice serves to inform you of the proposed settlement (the “Settlement”) of the above-captioned class action lawsuit (the “Litigation”) and the hearing (the “Settlement Hearing”) to be held by the Court to consider (a) the fairness, reasonableness, and adequacy of the Settlement, as set forth in the Stipulation of Settlement, dated October 11, 2023 (the “Stipulation”) (pp. 12-13, below), and the Plan of Allocation (pp. 5-7, below); (b) whether the Final Approval Order, as provided under the Stipulation, should be entered; (c) whether Judgment, as provided under the Stipulation, should be entered following fulfillment of the conditions set forth in the Stipulation; (d) whether to approve the Settlement and Plan of Allocation; (e) whether to award Lead Counsel attorneys’ fees and expenses (p. 9, below); and (f) whether to award Plaintiff an amount for his service on behalf of the Settlement Class or his reasonable time, costs, and expenses directly related to the representation of the Settlement Class (p. 9, below).
- The proposed Settlement concerns a lawsuit over whether Defendants made untrue statements of material fact in the Registration Statement and Prospectus, filed with the U.S. Securities and Exchange Commission in connection with Loma’s November 2017 IPO (the “Offering Materials”), or omitted to state material facts required to be stated therein or necessary to make the statements therein not misleading.
- If approved by the Court, the proposed Settlement will provide \$24,600,000 to pay claims from investors who purchased the publicly listed or publicly traded American Depository Shares (“ADSs”) issued by Loma pursuant to or traceable to Loma’s Offering Materials (the “Settlement Class” or “Settlement Class Members”), and are not otherwise excluded from the Settlement Class (see pp. 9-10, below).
- The Court has not yet approved the Settlement. Payments will be made only if the Court approves the Settlement and after any appeals are resolved. Please be patient.
- **Your legal rights are affected whether you act or don’t act. Read this Notice carefully.**

<u>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</u>	
SUBMIT A CLAIM FORM POSTMARKED (for U.S. Mail) OR RECEIVED BY A PRIVATE CARRIER (for FedEx, UPS, etc.), OR BY THE CLAIMS ADMINISTRATOR ONLINE, NO LATER THAN APRIL 19, 2024.	This is the only way to get a payment under the Settlement. If you have a Recognized Claim and want to receive a portion of the Settlement proceeds, you must submit the Proof of Claim and Release that is being distributed with this Notice.
SUBMIT A REQUEST FOR EXCLUSION POSTMARKED OR RECEIVED BY THE PRIVATE CARRIER (for FedEx, UPS, etc.), OR BY THE CLAIMS ADMINISTRATOR VIA EMAIL, NO LATER THAN MARCH 20, 2024.	Get no payment. This is the only option that allows you to bring your own lawsuit against the Released Parties about the Released Claims raised in this Action. If you exclude yourself, you will receive no payment and cannot object or speak at the Settlement Hearing.
OBJECT TO THE SETTLEMENT OR ANY RELATED ASPECT POSTMARKED OR RECEIVED BY THE PRIVATE CARRIER (for FedEx, UPS, etc.), OR BY THE CLAIMS ADMINISTRATOR VIA EMAIL, NO LATER THAN MARCH 20, 2024.	Write to the Court about why you do not like the Settlement. You may, but are not required to, appear at the Settlement Fairness Hearing. You cannot object to the Settlement unless you are a member of the Settlement Class and do not exclude yourself.
GO TO A HEARING.	You may ask to speak in Court about the fairness of the Settlement at the Settlement Hearing. Notify the Court of your intention to appear at the hearing in the written objection you send to the Court.
DO NOTHING.	Get no payment. Give up all legal rights relating to the claims at issue in this Litigation and be bound by the Judgment.

This Notice is intended to inform you how the proposed Settlement may affect your rights and what steps you may take in relation to it. This Notice is NOT an expression of any opinion by the Court as to the merits of the claims or defenses asserted in the Litigation or whether the Defendants engaged in any wrongdoing.

WHAT IS THIS LAWSUIT ABOUT?

I. THE ALLEGATIONS

Loma is the largest producer and distributor of cement in Argentina, and a subsidiary of Brazilian-based Camargo Corrêa S.A. (now known as Mover Participações S.A.). Plaintiff alleges that Loma and various related individuals and entities violated Sections 11 and 15 of the U.S. Securities Act of 1933 by making untrue statements or omitting to state material facts required to be disclosed in the Offering Materials for Loma's IPO. Specifically, Plaintiff alleges that the Offering Materials included untrue material statements about, and failed to disclose material information regarding, its corporate affiliates' alleged involvement in a bribery and kickback scheme, and about certain risks impacting demand from Argentine public works projects for Loma's products.

Defendants deny all of Plaintiff's allegations. Without limiting the generality of the foregoing in any way, Defendants have denied, and continue to deny, among other things, that any misstatements or materially misleading omissions were made or that Plaintiff or the Settlement Class have suffered any damages. Defendants do not admit and expressly deny any liability or wrongdoing in connection with the allegations set forth in the Litigation or any facts related thereto.

THE COURT HAS NOT RULED AS TO WHETHER DEFENDANTS ARE LIABLE TO PLAINTIFF OR THE SETTLEMENT CLASS. THIS NOTICE IS NOT INTENDED TO BE AN EXPRESSION OF ANY OPINION BY THE COURT WITH RESPECT TO THE TRUTH OF THE ALLEGATIONS IN THE LITIGATION OR THE

MERITS OF THE CLAIMS OR DEFENSES ASSERTED. THIS NOTICE IS SOLELY TO ADVISE YOU OF THE PROPOSED SETTLEMENT OF THE LITIGATION AND YOUR RIGHTS IN CONNECTION WITH THAT SETTLEMENT.

II. PROCEDURAL HISTORY

Plaintiff Dan Kohl filed the initial complaint in this Court on June 21, 2018. In addition to Loma, the initial complaint named the following entities as defendants: Bradesco Securities Inc., Citigroup Global Markets Inc., Bradesco Securities Inc., Citigroup Global Markets Inc., HSBC Securities (USA) Inc., Itaú BBA USA Securities, Inc., Merrill Lynch, Pierce, Fenner & Smith Incorporated, and Morgan Stanley & Co. LLC (collectively, the “Underwriter Defendants” and, together with Loma, “Defendants”).³

Plaintiff filed amended complaints on September 21, 2018, and January 18, 2019. The amended complaints asserted the same causes of action as the initial complaint but included additional factual allegations and theories of liability.

On March 13, 2019, Defendants filed a motion to dismiss Plaintiff’s second amended complaint. On May 10, 2019, Plaintiff filed an opposition to that motion, and on June 12, 2019, Defendants filed a reply. The Court granted Defendants’ motion in part and denied it in part on October 22, 2020, holding in pertinent part that Plaintiff had adequately pleaded Section 11 claims based on Plaintiff’s allegations that Loma’s disclosures omitted information concerning investigations into bribery and kickback schemes involving its corporate affiliates; and risks concerning demand and payment for its products and services.

Thereafter, the parties engaged in fact discovery, during which the parties served written discovery and each produced document discovery. Defendants produced over 750,000 pages of documents to Plaintiff and Plaintiff produced documents to Defendants and sat for a full day deposition.

On November 17, 2020, Defendants appealed the Court’s decision on the motion to dismiss. On January 11, 2021, while Defendants’ appeal was pending before the New York Supreme Court Appellate Division, Plaintiff moved for class certification. On April 23, 2021, Defendants opposed the motion for class certification, and on June 1, 2021, Plaintiff filed his reply.

On June 1, 2021, the New York Supreme Court Appellate Division modified the Court’s decision on the motion to dismiss. In pertinent part, the appellate court dismissed Plaintiff’s claims based on allegations that Loma failed to disclose certain law enforcement raids and/or inquests against executives of related corporate entities. The Appellate Division allowed Plaintiff’s action to proceed on the allegations that Loma misled investors with respect to its corporate affiliate’s involvement in corruption in Argentina and the market demand for its products and services.

On June 3, 2021, Defendants filed a motion for summary judgment, based in part on contentions that Plaintiff’s losses were not caused by Defendants, and requested that the Court hear arguments on Plaintiff’s class certification motion and Defendants’ summary judgment motion together. On July 30, 2021, Plaintiff filed an opposition to Defendants’ summary judgment motion and on August 27, 2021, Defendants filed a reply.

On November 16, 2021, the Court granted Plaintiff’s motion for class certification and denied Defendants’ motion for summary judgment, and entered orders thereon on December 2, 2021, and January 2, 2022.

On December 31, 2021, Defendants appealed the Court’s decision granting class certification and denying Defendants’ motion for summary judgment. On November 17, 2022, the appellate court denied Defendants’ appeal and affirmed the Court’s grant of class certification and denial of Defendants’ motion for summary judgment.

While Defendants’ second appeal was pending and while discovery was proceeding, the parties agreed to attempt to resolve the Litigation. On July 20, 2022, a mediation was conducted before a highly experienced mediator, David Murphy, Esq. At the end of the full-day session, the parties did not agree to settle the Litigation. Thereafter, the parties

³ The initial complaint also named as defendants Loma Negra Holding GmbH and various individuals (Sergio Faifman, Marco Gradin, Ricardo Fonseca De Mendonça Lima, Luiz Augusto Klecz, Paulo Diniz, Carlos Boero Hughes, Diana Mondino, Sergio Daniel Alonso). These persons were never served and have not appeared or otherwise been made parties to this Litigation. Pursuant to the terms of the Stipulation, however, the claims against these persons related to this Litigation will be released if the Settlement is approved.

remained in communication with the mediator and following the Appellate Division's denial of Defendants' second appeal, agreed to settle the Litigation on the terms set forth in the Stipulation, subject to the Court's approval. The Stipulation (together with the exhibits thereto) reflects the final and binding agreement between the Settling Parties.

HOW DO I KNOW IF I AM A SETTLEMENT CLASS MEMBER?

If you purchased or acquired Loma ADSs pursuant and/or traceable to the Registration Statement issued by Loma in connection with its November 2017 IPO, you are a Settlement Class Member, unless excluded from the Settlement Class by the terms of the Stipulation. As set forth in the Stipulation, excluded from the Settlement Class are: (a) Defendants; (b) the individuals originally named as defendants in the Litigation and members of their immediate families; (c) the respective parents and subsidiaries of Loma and the Underwriter Defendants; (d) the officers and directors of Loma and the Underwriter Defendants and their immediate families; (e) any entity in which any Defendant has or had a direct or indirect majority ownership interest; and (f) the legal representatives, heirs, successors, or assigns of any such excluded party. Notwithstanding any aforementioned exclusions from the definition of "Settlement Class," Investment Vehicles (as defined in the Stipulation) shall not be excluded from the Settlement Class. Also excluded from the Settlement Class is any Person who would otherwise be a Member of the Settlement Class, but who validly and timely has submitted, or submits, a Request for Exclusion in accordance with the requirements set by the Court.

PLEASE NOTE: Receipt of this Notice does not mean that you are a Settlement Class Member or that you will be entitled to receive a payment from the Settlement. If you are a Settlement Class Member and you wish to be eligible to participate in the distribution of proceeds from the Settlement, you are required to submit the Proof of Claim and Release that is being distributed with this Notice and the required supporting documentation, as set forth therein, postmarked (for U.S. Mail), received by the private carrier (for FedEx, UPS, etc.), or submitted online or via email **no later than April 19, 2024**.

WHAT IS THE MONETARY VALUE OF THE PROPOSED SETTLEMENT?

The Settlement, if approved, will result in the creation of a cash settlement fund of \$24,600,000, plus all interest and accretions thereto (the "Settlement Fund"). The Settlement Fund, less (a) any Fee and Expense Award; (b) any Plaintiff Award for representing the interests of the Settlement Class; (c) Notice and Administration Expenses; (d) Taxes and Tax Expenses; and (e) any other Court-approved deductions (the "Net Settlement Fund"), will be distributed to eligible Settlement Class Members pursuant to the Plan of Allocation that is described in the next section of this Notice.

WHAT IS THE PROPOSED PLAN OF ALLOCATION?

The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund among Settlement Class Members based on their respective alleged economic losses resulting from the securities law violations alleged in the Litigation.

Your share of the Net Settlement Fund will depend on the number of valid Proofs of Claim that other Settlement Class Members send in, how many shares of Loma ADSs you purchased or otherwise acquired, whether you sold any of those shares, and when you purchased, acquired, and/or sold such shares.

For purposes of determining the amount an Authorized Claimant (a Settlement Class Member who submits a valid Claim to the Claims Administrator that is accepted for payment) may recover under the Plan of Allocation, Lead Counsel conferred with their damages consultant in developing the Plan of Allocation. The calculation of claims is not an estimate of (a) actual damages, (b) the amount a Settlement Class Member might have been able to recover after a trial, or (c) the amount that will be paid to Settlement Class Members pursuant to the Settlement. It is a formula for allocating the Net Settlement Fund among all Authorized Claimants. The calculation of a Recognized Claim (as described below) will depend upon several factors, including when the shares were purchased or otherwise acquired and in what amounts, whether the shares were ever sold, and, if so, when they were sold and for what amounts.

The Claims Administrator shall determine each Settlement Class Member's share of the Net Settlement Fund based upon the recognized loss formula described below. A "Recognized Loss Amount" will be calculated as set forth for each purchase or acquisition of publicly traded or publicly listed shares of Loma ADSs pursuant or traceable to the Offering Materials that is listed in the Proof of Claim and Release and for which adequate documentation is provided. To the extent that the calculation of an Authorized Claimant's Recognized Loss Amount results in a negative number, that number shall

be set to zero. The sum of an Authorized Claimant's Recognized Loss Amounts will be the Authorized Claimant's "Recognized Claim."

Section 11 of the Securities Act serves as the basis for the calculation of the Recognized Loss Amounts under the Plan of Allocation. Section 11(e) of the Securities Act provides a statutory formula for the calculation of damages equal to "the difference between the amount paid for the security (not exceeding the price at which the security was offered to the public) and (1) the value thereof as of the time such suit was brought, or (2) the price at which such security shall have been disposed of in the market before suit, or (3) the price at which such security shall have been disposed of after suit but before judgment if such damages shall be less than the damages representing the difference between the amount paid for the security (not exceeding the price at which the security was offered to the public)." The formulas stated below, which were developed by Lead Counsel's damages expert, generally track the statutory formula.

For each share of publicly traded or publicly listed Loma ADSs purchased or otherwise acquired between November 1, 2017, and June 21, 2018, inclusive, and:

- A. sold before June 21, 2018,⁴ the Recognized Loss Amount for each such share shall be the acquisition price (not to exceed the issue price at the offering of \$19.00) minus the sale price.
- B. sold on or after June 21, 2018, through the close of trading on February 24, 2023, the Recognized Loss Amount for each such share shall be the acquisition price (not to exceed the issue price at the offering of \$19.00) minus the sale price (not to be less than \$12.36, the closing share price on June 21, 2018).
- C. retained through the close of trading on February 24, 2023, the Recognized Loss Amount for each such share shall be the acquisition price (not to exceed the issue price at the offering of \$19.00) minus \$12.36, the closing share price on June 21, 2018.

In the event a Class Member has more than one acquisition or sale of Loma ADSs, all acquisitions and sales shall be matched on a First-in First-Out ("FIFO") basis in the order of the transactions beginning with publicly traded ADSs purchased or otherwise acquired on November 1, 2017.

An acquisition or sale of Loma ADSs shall be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" date. All acquisition and sale prices shall exclude any fees and commissions. The receipt or grant by gift, devise, or operation of law of Loma ADSs shall not be deemed an acquisition or sale of Loma ADSs for the calculation of a claimant's Recognized Claim, nor shall it be deemed an assignment of any claim relating to the acquisition of such shares unless specifically provided in the instrument of gift or assignment. The receipt of Loma ADSs in exchange for securities of any other corporation or entity shall not be deemed an acquisition or sale of Loma ADSs.

Payment according to the Plan of Allocation will be deemed conclusive against all Authorized Claimants. No Person shall have any claim against Plaintiff, Plaintiff's Counsel, any claims administrator, any other Person designated by Plaintiff's Counsel, Defendants, Defendants' Related Parties, or Defendants' Counsel or their Related Parties based on distributions made substantially in accordance with the Stipulation, the Plan of Allocation, or further orders of the Court.

Purchases of Loma ordinary shares, or options thereon, or Loma ADSs purchased through the exercise of options, will be excluded from the calculation of an Authorized Claimant's Recognized Claim.

For any "short sales," the date of covering a "short sale" is deemed to be the date of purchase or acquisition of the Loma ADS. The date of a "short sale" is deemed to be the date of sale of the Loma ADS. Under the Plan of Allocation, however, the Recognized Loss Amount on "short sales" is zero. In the event that a claimant has an opening short position in Loma ADS, his, her, or its earliest Class Period purchases or acquisitions of Loma ADS will be matched against the opening short position, and not be entitled to a recovery, until that short position is fully covered.

The Claims Administrator shall allocate to each Authorized Claimant a *pro rata* share of the Net Settlement Fund based on his, her, or its Recognized Claim as compared to the total Recognized Claims of all Authorized Claimants. No distribution shall be made to Authorized Claimants who would otherwise receive a distribution of less than \$10.00.

⁴ For purposes of the statutory calculations, June 21, 2018, the date of filing of the initial complaint in this Litigation, is the date of suit.

Settlement Class Members who do not submit acceptable Proofs of Claim and Release will not share in the Settlement proceeds. The Settlement and the Judgment issued in this Litigation will nevertheless bind Settlement Class Members who do not submit a Request for Exclusion (as defined below) and/or an acceptable Proof of Claim and Release.

Please contact the Claims Administrator or Lead Counsel if you disagree with any determinations made by the Claims Administrator regarding your Proof of Claim and Release. If you are unsatisfied with the determinations, you may ask the Court, which retains jurisdiction over all Settlement Class Members and the claims administration process, to decide the issue by submitting a written request.

Defendants, their respective counsel, and all other Related Parties will have no responsibility or liability whatsoever for the investment of the Settlement Fund, the distribution of the Net Settlement Fund, the Plan of Allocation, or the payment of any claim. Plaintiff, Plaintiff's Counsel, and any other Person designated by Plaintiff's Counsel, likewise, will have no liability for their reasonable efforts to execute, administer, and distribute the Settlement.

Distributions will be made to Authorized Claimants after all claims have been processed and after the Court has finally approved the Settlement. If there is any balance remaining in the Net Settlement Fund six months after the date of the initial distribution of the Net Settlement Fund, Lead Counsel shall, if feasible, after payment of any outstanding Notice and Administration Expenses, reallocate such balance among Authorized Claimants who negotiated the checks sent in the initial distribution and who would receive a minimum of \$10.00 as part of an additional distribution. These additional distributions shall be repeated every six months until the balance remaining in the Net Settlement Fund is reduced to a *de minimis* level such that, in the reasonable judgment of Lead Counsel, it no longer makes economic sense, considering costs of distribution, to attempt to make further distributions. Any balance that thereafter still remains in the Net Settlement Fund after such reallocation(s) and payments, which is not feasible or economical to reallocate, shall be donated to the City Bar Fund, a §501(c)(3) non-profit corporation benefitting the New York City Bar Justice Center, or another §501(c)(3), non-profit charitable organization designated by Plaintiff and approved by the Court.

DO I NEED TO CONTACT PLAINTIFF'S COUNSEL IN ORDER TO PARTICIPATE IN DISTRIBUTION OF THE SETTLEMENT FUND?

No. If you have received this Notice and timely submit your Proof of Claim to the designated address, you need not contact Plaintiff's Counsel. If your address changes, please contact the Claims Administrator at:

Loma Negra Securities Litigation Settlement
Claims Administrator
c/o A.B. Data, Ltd.
P.O. Box 173110
Milwaukee, WI 53217
Telephone: (877) 311-3744
www.LomaNegraSecuritiesLitigation.com

THERE WILL BE NO PAYMENTS IF THE STIPULATION IS TERMINATED.

The Stipulation may be terminated under several circumstances outlined in it. If the Stipulation is terminated, the Litigation will proceed as if the Stipulation had not been entered into.

WHAT ARE THE REASONS FOR SETTLEMENT?

The Settlement was reached after a thorough investigation by Lead Counsel and following the Court's denial, in part, of the Defendants' motion to dismiss the second amended complaint, the appellate court's modification of the Court's motion to dismiss order, the Court's granting of Plaintiff's motion for class certification and denial of Defendants' summary judgment motion based in part on contentions that Plaintiff's losses were not caused by Defendants, and after significant written and document discovery. The Court has not reached any final decisions in connection with Plaintiff's claims. Instead, Plaintiff and Defendants have agreed to the Settlement, which was reached with the substantial assistance of a highly respected mediator of complex class actions. In reaching the Settlement, the Settling Parties have avoided the cost, delay, and uncertainty of further litigation, trial, and additional appeals.

As in any litigation, Plaintiff and the Settlement Class would face an uncertain outcome if they did not agree to the Settlement. For example, most of the witnesses were located in Argentina, and although Plaintiff had sought the required Letters Rogatory to obtain certain necessary testimony and additional documents, there is no assurance that the letters would have received an affirmative response, particularly from the relevant Argentine and Brazilian central authorities, or that Plaintiff would otherwise have been able to secure the necessary testimony and document to prove his case, or obtain them in a timely manner given the delays and other impediments often attendant to such requests for international discovery. Also, Plaintiff expected that if the Litigation continued, the Defendants would argue at a second summary judgment motion and at trial that the alleged false statements in the Offering Documents were true and not misleading. Plaintiff also expected that Defendants would argue that Plaintiff and the Settlement Class were not entitled to damages under 15 U.S.C. §77(e) because the decline in the value of Loma ADSs was not caused by the alleged untrue or misleading statements in the Offering Materials (also sometimes referred to as a “negative causation” defense). Plaintiff expected that the Litigation could continue for a lengthy period of time and that, even if Plaintiff succeeded, Defendants would file appeals that would postpone final resolution of the Litigation for years to come. In agreeing to the Settlement, Plaintiff considered the expense and length of continued proceedings necessary to pursue his and the Settlement Class’s claims against the Defendants through continued discovery, trial, and appeals. And while continuation of the Litigation against Defendants potentially could result in a judgment greater than the Settlement, there is also the risk that continuing the Litigation could result in no recovery at all or a recovery that is less than the amount of the Settlement.

Plaintiff and Plaintiff’s Counsel believe that the Settlement is fair and reasonable to the Members of the Settlement Class. They have reached this conclusion for several reasons. Specifically, if the Settlement is approved, the Settlement Class will receive a certain and immediate monetary recovery. Additionally, Plaintiff’s Counsel believe that the significant and immediate benefits of the Settlement, when weighed against the significant risk, delay, and uncertainty of continued litigation, are a very favorable result for the Settlement Class.

The Defendants have expressly denied, and continue to deny, each and all of the claims alleged by Plaintiff in the Litigation and affirm that they have acted properly and lawfully at all times. Further, the Defendants have expressly denied, and continue to deny, all charges of wrongdoing, fault, liability, or damage against them arising out of any and all of the conduct, statements, acts, or omissions alleged, or that could have been alleged, in the Litigation. The Defendants maintain that they have strong and meritorious defenses to all of the claims alleged in this Litigation. However, the Defendants also recognize the uncertainty and risks inherent in any litigation, especially in a complex case such as this. The Defendants have concluded that further conduct of the Litigation would be protracted and expensive, and that it is desirable that the Litigation be fully and finally settled in the manner and upon the terms and conditions set forth in the Settlement.

WHO REPRESENTS THE SETTLEMENT CLASS?

The following attorneys are counsel for the Settlement Class:

Shannon L. Hopkins, Esq.
Andrew E. Lencyk, Esq.
David C. Jaynes, Esq.
LEVI & KORSINSKY, LLP
33 Whitehall Street, 17th Floor
New York, NY 10004
Telephone: (212) 363-7500

If you have any questions about the Litigation or Settlement, you are entitled to consult with Lead Counsel by contacting counsel at the phone number listed above.

You may obtain a copy of the Stipulation by contacting the Claims Administrator at:

Loma Negra Securities Litigation Settlement
Claims Administrator
c/o A.B. Data, Ltd.
P.O. Box 173110
Milwaukee, WI 53217
Telephone: (877) 311-3744
www.LomaNegraSecuritiesLitigation.com

HOW WILL PLAINTIFF'S COUNSEL BE PAID?

Lead Counsel have litigated this matter since its inception on a fully contingent basis and advanced all expenses on behalf of the Settlement Class. Lead Counsel will file a motion for an award of attorneys' fees and expenses that will be considered at the Settlement Hearing. Lead Counsel will apply for an attorneys' fee award for Plaintiff's Counsel in the amount of up to 33-1/3% or 1/3 of the Settlement Fund, plus payment of Plaintiff's Counsel's expenses incurred in connection with the Litigation in an amount not to exceed \$250,000. In addition, Plaintiff may seek a payment of up to \$10,000 in the aggregate for his service on behalf of the Settlement Class for his reasonable time, costs, and expenses directly relating to the representation of the Settlement Class. Such sums, as may be approved by the Court, will be paid from the Settlement Fund. Settlement Class Members are not personally liable for any such fees or expenses.

The Fee and Expense Award requested will be the only payment to Plaintiff's Counsel for their efforts in achieving the Settlement and for their risk in undertaking this representation on a wholly contingent basis. The fees requested will compensate Plaintiff's Counsel for their work in achieving the Settlement. The Court will decide what constitutes a reasonable fee award and may award less than the amount requested by Lead Counsel.

CAN I EXCLUDE MYSELF FROM THE SETTLEMENT?

Yes. If you do not want to receive a payment from the Settlement, or you want to keep the right to sue or continue to sue Defendants on your own about the legal issues in the Litigation, then you must take steps to get out of the Settlement Class. This is called excluding yourself from, or "opting out" of, the Settlement Class. If you are requesting exclusion because you want to bring your own lawsuit based on the matters alleged in the Litigation, you may want to consult an attorney and discuss whether any individual claim that you may wish to pursue would be time-barred by the applicable statutes of limitation or repose.

To exclude yourself from the Settlement Class, you must send a written or email request saying that you want to be excluded from the Settlement Class in the following Litigation: *Dan Kohl, et al. v. Loma Negra Compañía Industrial Argentina S.A., et al.*, Index No. 653114/2018 (a "Request for Exclusion"). The Request for Exclusion must include your name, address, telephone number, and the number of Loma ADSs that you purchased or otherwise acquired pursuant or traceable to the Offering Materials, as well as the date(s) and price(s) of each purchase, acquisition, and/or sale of such ADSs. Your Request for Exclusion must also include adequate documentation to evidence your transactions in Loma ADSs (such as account statements or trading records) and must be personally signed by the Settlement Class Member. Do not send originals of your documentation as they will not be returned. All Requests for Exclusion must be postmarked (for U.S. Mail) or received by the private carrier (for FedEx, UPS, etc.) no later than **March 20, 2024**, and sent to the Claims Administrator at:

Loma Negra Securities Litigation Settlement
Claims Administrator
c/o A.B. Data, Ltd.
EXCLUSIONS
P.O. Box 173001
Milwaukee, WI 53217
Email: info@LomaNegraSecuritiesLitigation.com

You cannot exclude yourself by phone. If you make a proper Request for Exclusion, you will not receive a settlement payment, and you cannot object to the Settlement. If you make a proper Request for Exclusion, you will not be legally bound by anything that happens in this lawsuit.

If you have already excluded yourself in response to the Notice of Pendency of Class Action, dated January 31, 2022, and previously disseminated in this Litigation, you need not submit another Request for Exclusion in order to be excluded from the Settlement, and you may be able to retain the right to sue or continue to sue Defendants on your own about the legal issues in the Litigation, but you will not be able to receive a settlement payment, and you cannot object to the Settlement.

**CAN I OBJECT TO THE SETTLEMENT, REQUESTED ATTORNEYS' FEES,
REQUESTED PAYMENT OF COSTS AND EXPENSES, REQUESTED PAYMENT
TO THE PLAINTIFF, AND/OR PLAN OF ALLOCATION?**

Yes. If you are a Settlement Class Member, you may object to the terms of the Settlement. Whether or not you object to the terms of the Settlement, you may also object to the requested attorneys' fees, costs, and expenses, Plaintiff's request for award(s) for representing the Settlement Class, and/or the Plan of Allocation. In order for any objection to be considered, you must file a written statement, accompanied by proof of Settlement Class membership (such as account statements or trading records, which must be redacted to remove personal identifying information such as Social Security Numbers, dates of birth, children's names, and financial account numbers in order to comply with 22 NYCRR § 202.5(e)) evidencing the number of Loma American Depository Shares that the objecting Settlement Class Member purchased or otherwise acquired pursuant or traceable to the Offering Materials, as well as the date(s) and price(s) of each purchase, acquisition, and/or sale of such ADSs, with the Court and send a copy to Lead Counsel and Defendants' Counsel, at the addresses and/or emails listed below. **Do not send originals of your documentation as they will not be returned.** Any written objection must be personally signed by the Settlement Class Member. Your written statement must identify that you want to object to the Settlement in the following Litigation: *Dan Kohl, et al. v. Loma Negra Compañía Industrial Argentina S.A., et al.*, Index No. 653114/2018. Your written objection must be postmarked (for U.S. Mail) or received by the private carrier (for FedEx, UPS, etc.) no later than **March 20, 2024**.

The Court's address is Supreme Court of the State of New York, County of New York: Commercial Division, 60 Centre Street, Room 238, New York, NY 10007; Lead Counsel's address is Levi & Korsinsky, LLP, c/o Shannon L. Hopkins, Esq., 33 Whitehall Street, 17th Floor, New York, NY 10004, shopkins@zlk.com; and Defendants' Counsel's addresses are White & Case LLP, c/o Kimberly A. Havlin, 1221 Avenue of the Americas, New York, NY 10020, kim.havlin@whitecase.com, and Shearman & Sterling LLP, Grace J. Lee, 599 Lexington Avenue, New York, NY 10022, grace.lee@shearman.com.

You cannot object by phone.

Attendance at the Settlement Hearing is not necessary. Persons wishing to be heard orally at the Settlement Hearing are required to indicate in their written objection their intention to appear at the hearing and identify any witnesses they may call to testify and exhibits, if any, they intend to introduce into evidence.

**WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING
MYSELF FROM THE SETTLEMENT?**

Objecting is telling the Court that you do not like something about the proposed Settlement, the Plan of Allocation, Plaintiff's request for an award for representing the Settlement Class, or Lead Counsel's request for an award of attorneys' fees and expenses. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the Litigation no longer applies to you.

WHAT ARE MY RIGHTS AND OBLIGATIONS UNDER THE SETTLEMENT?

If you are a Settlement Class Member and you do not exclude yourself from the Settlement Class, you may receive the benefit of, and you will be bound by, the terms of the Settlement, as described in this Notice, upon approval by the Court.

HOW CAN I GET A PAYMENT?

In order to qualify for a payment, you must timely complete and return the Proof of Claim and Release that accompanies this Notice. A Proof of Claim is enclosed with this Notice and also may be downloaded at www.LomaNegraSecuritiesLitigation.com. Read the instructions carefully; fill out the Proof of Claim and Release; sign it; and mail or submit it online, along with the required supporting documents, so that it is **postmarked (for U.S. Mail, if mailed) or received by the private carrier (for FedEx, UPS, etc.) or received by the Claims Administrator (if submitted online) no later than April 19, 2024**. The Proof of Claim and Release may be submitted online at www.LomaNegraSecuritiesLitigation.com. If you do not submit a timely Proof of Claim with all of the required information, you will not receive a payment from the Settlement Fund; however, unless you expressly exclude yourself

from the Settlement Class, as described above, you will still be bound in all other respects by the Settlement, Judgment, and releases contained in them.

Due to economic conditions and related restrictions in Argentina, certain payments on behalf of Loma toward the Settlement amount will be funded 365 days from the date the Stipulation was signed, or October 11, 2024, as indicated in paragraphs 2.7-2.8 of the Stipulation. Plaintiff does not believe this will materially, if at all, affect the timely distribution of the Net Settlement Fund as it typically takes a claims administrator approximately six to eight months from the entry of the Final Approval Order to process all submitted claims.

WHAT CLAIMS WILL BE RELEASED BY THE SETTLEMENT?

If the Settlement is approved by the Court, the Court will enter a Judgment. If the Judgment becomes Final pursuant to the terms of the Stipulation, all Settlement Class Members shall be deemed to have, and by operation of the Final Judgment shall have, fully, finally, and forever released, relinquished, and discharged any and all of the Released Defendant Parties from all Released Claims. The Judgment shall also provide for the full and final release of all Released Defendants' Claims, as against the Released Plaintiff Parties.

- “Related Parties” when used in reference to a Person, means and includes (i) the Person; (ii) for natural persons, each of that Person’s immediate family members and any trust of which the Person is settler or which is for the benefit of any such Person and/or member of his family, and, for non-natural persons, each of their direct or indirect parents, controlling shareholders, subsidiaries, and other affiliates; and (iii) for any of the Persons listed in sub-parts (i) or (ii) of this definition, their respective present and former employees, members, partners, principals, officers, directors, controlling shareholders, agents, attorneys, advisors (including financial or investment advisors), accountants, auditors, consultants, underwriters, investment bankers, commercial bankers, entities providing fairness opinions, general or limited partners or partnerships, limited liability companies, members, investment funds, investment sub-funds, joint venturers, insurers, reinsurers, predecessors, successors, estates, immediate family members, spouses, heirs, executors, trusts, trustees, administrators, agents, attorneys, legal or personal representatives, assigns, and assignees of each of them, and any controlling person thereof, in their capacities as such, and any entity in which such Person has a controlling interest.
- “Released Defendant Party” or “Released Defendant Parties” mean Defendants, Defendants’ Counsel, and their Related Parties.
- “Released Defendants’ Claims” means any and all claims and causes of action of every nature and description whatsoever, including both known claims and Unknown Claims (as defined below and in ¶1.54 of the Stipulation), against Released Plaintiff Parties that arise out of or relate in any way to the institution, prosecution, or settlement of the claims against any Defendant in the Litigation, except for claims relating to the enforcement of the Settlement. “Released Defendants’ Claims” do not include claims between or among Defendants or any combination of Defendants, including claims for indemnification.
- “Released Plaintiff Party” or “Released Plaintiff Parties” mean each and every Settlement Class Member, Plaintiff, Lead Counsel, Plaintiff’s Counsel, and their Related Parties.
- “Released Class Claims” means all claims, debts, actions, losses, rights, dues, suits, sums of money, accounts, liabilities, reckonings, bonds, bills, covenants, contracts, controversies, agreements, promises, variances, trespasses, damages, judgments, awards, extents, executions, and demands whatsoever (including, but not limited to, any claims for damages, interest, attorneys’ fees, expert or consulting fees, and any other costs, expenses, or liability), and causes of action of every nature and description, including both known claims and Unknown Claims (as defined below and in ¶1.54 of the Stipulation), whether arising under federal, state, common, statutory, administrative, or foreign law, or any other law, rule, or regulation, whether in law or in equity, whether class or individual in nature, whether fixed or contingent, whether accrued or unaccrued, whether liquidated or unliquidated, whether matured or unmatured, whether direct, indirect, or inconsequential, whether suspected or unsuspected, which the Released Plaintiff Parties, in their individual capacities and/or in their capacities as purchasers of Loma American Depository Shares (“ADSs”), ever had, now has, or hereafter can, shall, or may have, whether in their own right or by assignment, transfer, or grant from any other person, thing, or entity that: (i) have been asserted in this Litigation by Lead Plaintiff or any other Settlement Class Member against any of the Released Defendant Parties; or (ii) could have been asserted in any court or forum by Lead Plaintiff or any other Settlement Class Member against any of the

Released Defendant Parties, that arise out of, are based upon, or relate in any way, directly or indirectly, to the allegations, transactions, facts, statements, matters or occurrences, representations, or omissions involved, set forth, or referred to in the Complaint or that relate to the purchase, acquisition, holding, sale, and/or disposition of Loma ADSs issued in or pursuant and/or traceable to Loma's Initial Public Offering. Released Class Claims shall not include: (i) any claims relating to the enforcement of the Settlement; or (ii) any claims of any person or entity who or which submits a request for exclusion from the Settlement Class that is accepted by the Court.

- "Unknown Claims" means (a) any and all Released Class Claims that any of the Released Plaintiff Parties do not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Parties, which, if known by him, her, or it, might have affected his, her, or its settlement with and release of the Released Defendant Parties, or might have affected his, her, or its decision(s) with respect to the Settlement, including, but not limited to, whether or not to object to the Settlement or seek exclusion from the Settlement Class; and (b) any and all Released Defendants' Claims that any of the Released Defendant Parties do not know or suspect to exist in his, her, or its favor at the time of the release of the Released Plaintiff Parties that, if known by him, her, or it, might have affected his, her, or its settlement and release of the Released Plaintiff Parties. With respect to (a) any and all Released Class Claims and (b) any and all Released Defendants' Claims, the Settling Parties stipulate and agree that, upon the Effective Date, the Settling Parties shall expressly waive, and each Released Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have expressly waived, the provisions, rights, and benefits of California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party;

and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code §1542.

The above description of the proposed Settlement is only a summary. The complete terms are set forth in the Stipulation (including its exhibits), which may be obtained at www.LomaNegraSecuritiesLitigation.com, or by contacting the Claims Administrator at the contact information listed on p. 9 above.

THE SETTLEMENT HEARING

The Court will hold a Settlement Hearing on April 10, 2024, at 2:00 p.m., before the Honorable Andrew Borrok at the Supreme Court of the State of New York, County of New York: Commercial Division, 60 Centre Street, Courtroom 238, New York, NY 10007, for the purpose of determining whether: (i) the Settlement, as set forth in the Stipulation, for \$24,600,000 in cash should be approved by the Court as fair, reasonable, and adequate; (ii) Judgment, as provided under the Stipulation, should be entered upon payment in full of the \$24.6 million settlement amount; (iii) to award Plaintiff's Counsel attorneys' fees and expenses out of the Settlement Fund and, if so, in what amount; (iv) to compensate Plaintiff for his efforts in representing the Settlement Class out of the Settlement Fund and, if so, in what amount; and (v) the Plan of Allocation should be approved by the Court. The Court may adjourn or continue the Settlement Hearing or hold the Settlement Hearing by telephonic or video conference without further notice to members of the Settlement Class. Any change to the Settlement Hearing date, time, or manner will be posted on the settlement website (www.LomaNegraSecuritiesLitigation.com). Please check the settlement website before attending to be sure that the date and/or time has not changed.

Any Settlement Class Member may appear at the Settlement Hearing and be heard on any of the foregoing matters; provided, however, that no such Person shall be heard unless his, her, or its objection is made in writing and is signed by such Person, and filed, together with proof of membership in the Settlement Class and with copies of all other papers and briefs to be submitted by them to the Court at the Settlement Hearing, with the Court no later than March 20, 2024, and showing proof of service on the following counsel:

Shannon L. Hopkins
LEVI & KORSINSKY, LLP
33 Whitehall Street, 17th Floor
New York, NY 10004

Attorneys for Plaintiff

Kimberly A. Havlin
WHITE & CASE LLP
1221 Avenue of the Americas
New York, NY 10020

Attorneys for Loma

Grace J. Lee
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, NY 10022

*Attorneys for the Underwriter
Defendants*

Unless otherwise directed by the Court, any Settlement Class Member who does not make his, her, or its objection in the manner provided above shall be deemed to have waived all objections to the Settlement and shall be foreclosed from raising (in this or any other proceeding or on any appeal) any objection and any untimely objection shall be barred.

If you hire an attorney (at your own expense) to represent you for purposes of objecting, your attorney must serve a notice of appearance on counsel listed above and file it with the Court (at the address set out above) by no later than March 20, 2024.

INJUNCTION

The Court has issued an order enjoining all Settlement Class Members from instituting, commencing, maintaining, or prosecuting any action in any court or tribunal that asserts Released Claims against any Released Defendant Party, pending Final determination by the Court of whether the Settlement should be approved.

HOW DO I OBTAIN ADDITIONAL INFORMATION?

This Notice contains only a summary of the terms of the proposed Settlement. The records in the Litigation may be examined and copied at any time during regular office hours, and subject to customary copying fees, at the Office of the Clerk of the Supreme Court of New York, County of New York. In addition, all of the Settlement documents, including the Stipulation, this Notice, the Proof of Claim and Release, and proposed Judgment, may be obtained by contacting the Claims Administrator at:

Loma Negra Securities Litigation Settlement
Claims Administrator
c/o A.B. Data, Ltd.
P.O. Box 173110
Milwaukee, WI 53217
Email: info@LomaNegraSecuritiesLitigation.com
Telephone: (877) 311-3744
www.LomaNegraSecuritiesLitigation.com

In addition, you may contact Shannon L. Hopkins, Esq., Levi & Korsinsky, LLP, 33 Whitehall Street, 17th Floor, New York, NY 10004, Tel. No. (212) 363-7500, if you have any questions about the Litigation or the Settlement.

DO NOT WRITE TO OR TELEPHONE THE COURT FOR INFORMATION.

SPECIAL NOTICE TO BANKS, BROKERS, AND OTHER NOMINEES

If you hold any Loma ADSs purchased or acquired between November 1, 2017, and June 21, 2018, inclusive, as a nominee for a beneficial owner, then, within fourteen (14) business days after you receive this Notice, you must either: (i) send a copy of this Notice, and the enclosed Proof of Claim and Release, by First-Class Mail to all such Persons; or (ii) provide a list of the names and addresses of such Persons to the Claims Administrator:

Loma Negra Securities Litigation Settlement
Claims Administrator
c/o A.B. Data, Ltd.
P.O. Box 173110
Milwaukee, WI 53217
Email: info@LomaNegraSecuritiesLitigation.com
Telephone: (877) 311-3744
www.LomaNegraSecuritiesLitigation.com

If you choose to mail the Notice and Proof of Claim yourself, you may obtain from the Claims Administrator (without cost to you) as many additional copies of these documents as you will need to complete the mailing.

Regardless of whether you choose to complete the mailing yourself or elect to have the mailing performed for you, you may obtain reimbursement for, or advancement of, reasonable administrative costs actually incurred or expected to be incurred in connection with forwarding the Notice and Proof of Claim and Release, and which would not have been incurred but for the obligation to forward such documents, upon submission of appropriate documentation to the Claims Administrator.

DATED: NOVEMBER 30, 2023

BY ORDER OF THE SUPREME COURT OF
NEW YORK, COUNTY OF NEW YORK: COMMERCIAL DIVISION
THE HONORABLE ANDREW BORROK, J.S.C.

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION**

DAN KOHL, *et al.*,

Plaintiff,

v.

LOMA NEGRA COMPANIA INDUSTRIAL ARGENTINA
SOCIEDAD ANONIMA, LOMA NEGRA HOLDING GMBH,
SERGIO FAIFMAN, MARCO GRADIN, RICARDO
FONSECA DE MENDONÇA LIMA, LUIZ AUGUSTO
KLE CZ, PAULO DINIZ, CARLOS BOERO HUGHES, DIANA
MONDINO, SERGIO DANIEL ALONSO, BRADESCO
SECURITIES INC., CITIGROUP GLOBAL MARKETS INC.,
HSBC SECURITIES (USA) INC., ITAU BBA USA
SECURITIES, INC., MERRILL LYNCH, PIERCE, FENNER &
SMITH INCORPORATED AND MORGAN STANLEY & CO.
LLC,

Defendants.

Index No. 653114/2018

Part 53

Hon. Andrew Borrok

PROOF OF CLAIM AND RELEASE

I. GENERAL INSTRUCTIONS

1. To recover as a Settlement Class Member based on the claims in the action titled *Dan Kohl, et al. v. Loma Negra Compañía Industrial Argentina S.A., et al.*, Index No. 653114/2018 (the “Litigation”),¹ you must complete and sign this Proof of Claim and Release (“Proof of Claim”). If you fail to file a properly addressed Proof of Claim (as set forth in ¶3 below), your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed Settlement.

2. Submission of this Proof of Claim, however, does not assure that you will share in the proceeds of the Settlement of the Litigation.

3. YOU MUST SUBMIT YOUR COMPLETED PROOF OF CLAIM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, SO THAT IT IS **POSTMARKED (FOR U.S. MAIL) OR RECEIVED BY THE PRIVATE CARRIER (FOR FEDEX, UPS, ETC.) OR RECEIVED BY THE CLAIMS ADMINISTRATOR (IF SUBMITTED ONLINE) ON OR BEFORE APRIL 19, 2024**, ADDRESSED AS FOLLOWS:

Loma Negra Securities Litigation Settlement
Claims Administrator
c/o A.B. Data, Ltd.
P.O. Box 173110
Milwaukee, WI 53217

www.LomaNegraSecuritiesLitigation.com (online portal)
info@LomaNegraSecuritiesLitigation.com

If you are NOT a Settlement Class Member, as defined in the Notice of Proposed Settlement of Class Action (“Notice”), DO NOT submit a Proof of Claim.

4. If you are a Settlement Class Member and you do not timely request exclusion (or have not previously validly done so in response to the Notice of Pendency of Class Action dated January 31, 2022, disseminated in this

¹This Proof of Claim and Release (“Proof of Claim”) incorporates by reference the definitions in the Stipulation of Settlement (“Stipulation”), which can be obtained at www.LomaNegraSecuritiesLitigation.com.

Litigation), YOU WILL BE BOUND by the terms of any judgment entered in the Litigation, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM.

II. CLAIMANT IDENTIFICATION

You are a Member of the Settlement Class if you purchased or otherwise acquired publicly listed or publicly traded American Depository Shares (“ADSs”) of Loma Negra Compañía Industrial Argentina S.A. (“Loma” or the “Company”) (ticker symbol: “LOMA”) pursuant or traceable to the Offering Materials issued in connection with Loma’s IPO, unless you are an excluded party under the terms of the Stipulation.

Use Part I of this form titled “Claimant Information” to identify each purchaser or acquirer of the Loma ADSs that forms the basis of this claim. **THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL PURCHASER(S) OR ACQUIRER(S), OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER(S) OR ACQUIRER(S), OF THE LOMA ADSs UPON WHICH THIS CLAIM IS BASED.**

All joint purchasers or acquirers must sign this claim. Executors, administrators, guardians, conservators, and trustees must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Security Number (or Taxpayer Identification Number) and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

III. CLAIM FORM

Use Part II of this form titled “Schedule of Transactions in Loma ADSs” to supply all required details of your transaction(s). If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

On the schedules, provide all of the requested information with respect to *all* of your *purchases and acquisitions* of publicly traded or publicly listed Loma ADSs between November 1, 2017, and June 21, 2018, inclusive. On the schedules, also provide all of the requested information with respect to *all* of your *sales* of Loma ADSs between November 1, 2017, and February 24, 2023, whether such transactions resulted in a profit or a loss. You must also provide all of the requested information with respect to the number of shares of Loma ADSs you held at the close of trading on February 24, 2023, and the total number of shares of Loma ADSs you purchased or otherwise acquired between June 22, 2018, and February 24, 2023, inclusive. Failure to report all such transactions may result in the rejection of your claim.

List each transaction separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS IN LOMA ADSs SHOULD BE ATTACHED TO YOUR CLAIM. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM OR RESULT IN REJECTION OF YOUR CLAIM.

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. All such claimants **MUST** also submit a manually signed paper Proof of Claim whether or not they also submit electronic copies. If you wish to submit your claim electronically, you must contact the Claims Administrator at info@LomaNegraSecuritiesLitigation.com or (877) 311-3744 to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant a written acknowledgment of receipt and acceptance of electronically submitted data.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION
Dan Kohl, et al. v. Loma Negra Compañía Industrial Argentina S.A., et al.,
Index No. 653114/2018

PROOF OF CLAIM AND RELEASE

PART I: CLAIMANT INFORMATION

The Claims Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Claims Administrator in writing at the address above. Complete names of all persons and entities must be provided.

Beneficial Owner's Name:

Co-Beneficial Owner's Name:

Representative or Custodian Name (if different from Beneficial Owner(s) listed above):

Address 1 (street name and number):

Address 2 (apartment, unit, or box number):

City State/Province Zip/Postal Code Country

Last Four Digits of your Social Security Number or Taxpayer Identification Number:

Telephone Number (home):

Telephone Number (work):

Email Address:

Account Number (if filing for multiple accounts, file a separate Claim Form for each account):

Claimant Account Type (check appropriate box):

- Individual (includes joint owner accounts)
- Corporation
- IRA/401k
- Other (please specify): _____
- Pension Plan
- Estate
- Trust

PART II: SCHEDULE OF TRANSACTIONS IN LOMA AMERICAN DEPOSITORY SHARES (“ADSs”)

A. Purchases or acquisitions of Loma ADSs between November 1, 2017, and June 21, 2018, inclusive: Separately list each and every purchase/acquisition of publicly traded or publicly listed Loma ADSs made between November 1, 2017, and June 21, 2018, inclusive (must be documented):

Trade Date(s) Month/Day/Year (chronologically)	Number of Shares Purchased or Acquired	Purchase Price Per Share	Total Purchase or Acquisition Price (excluding commissions, taxes, and fees)	Was this Purchase or Acquisition the result of an option?	Proof of Purchase/ Acquisition Enclosed
1.	1.	1.	1.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	2.	2.	2.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	3.	3.	3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

If you received shares through an acquisition or merger, please identify the date, the share amount, and the company acquired:

MM / DD / YY Merger Shares Company

B. Purchases or acquisitions of Loma ADSs between June 22, 2018, and February 24, 2023, inclusive: State the total number of shares of publicly traded or publicly listed Loma ADSs purchased or otherwise acquired between June 22, 2018, and February 24, 2023, inclusive. If none, write “zero” or “0”.

C. Sales of Loma ADSs: Separately list each and every sale/disposition of publicly traded or publicly listed Loma ADSs made between November 1, 2017, and February 24, 2023 (must be documented):

If none, check here:

Trade Date(s) Month/Day/Year (chronologically)	Number of Shares Sold	Sale Price Per Share	Total Sales Price (excluding commissions, taxes, and fees)	Proof of Sale Enclosed
1.	1.	1.	1.	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	2.	2.	2.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	3.	3.	3.	<input type="checkbox"/> Yes <input type="checkbox"/> No

D. Number of shares of Loma ADSs held at the close of trading on February 24, 2023: State the total number of shares of publicly traded or publicly listed Loma ADSs held on February 24, 2023. If none, write “zero” or “0”.

Proof of Position Enclosed: Yes No

**YOU MUST READ AND SIGN THE RELEASE BELOW.
FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY
IN PROCESSING OR THE REJECTION OF YOUR CLAIM.**

IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

I (We) submit this Proof of Claim under the terms of the Stipulation described in the Notice. I (We) also submit to the jurisdiction of the Supreme Court of the State of New York, County of New York: Commercial Division, with respect to my (our) claim as a Settlement Class Member and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Litigation. I (We) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so. I (We) have not submitted any other claim covering the same purchases, acquisitions, or sales of Loma ADSs and know of no other Person having done so on my (our) behalf.

V. RELEASE

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever settle, release, and discharge from the Released Claims each and all of the Released Defendant Parties, defined below.

2. "Related Parties," when used in reference to a Person, means and includes (i) the Person; (ii) for natural persons, each of that Person's immediate family members and any trust of which the Person is settler or which is for the benefit of any such Person and/or member of his family, and, for non-natural persons, each of their direct or indirect parents, subsidiaries, or wholly-owned affiliates; and (iii) for any of the Persons listed in sub-parts (i) or (ii) of this definition, their respective present and former employees, members, partners, principals, officers, directors, controlling shareholders, agents, attorneys, advisors (including financial or investment advisors), accountants, auditors, consultants, underwriters, investment bankers, commercial bankers, entities providing fairness opinions, general or limited partners or partnerships, limited liability companies, members, investment funds, investment sub-funds, joint venturers, insurers, reinsurers, predecessors, successors, estates, immediate family members, spouses, heirs, executors, trusts, trustees, administrators, agents, attorneys, legal or personal representatives, assigns, and assignees of each of them, and any controlling person thereof, in their capacities as such, and any entity in which such Person has a controlling interest.

3. "Released Defendant Party" or "Released Defendant Parties" mean Defendants, Defendants' Counsel, and their Related Parties, including each of the persons originally included as defendants in this case, *i.e.*, Loma Negra Holding GmbH, Sergio Faifman, Marco Gradin, Ricardo Fonseca De Mendonça Lima, Luiz Augusto Klecz, Paulo Diniz, Carlos Boero Hughes, Diana Mondino, Sergio Daniel Alonso.

4. "Released Defendants' Claims" means any and all claims and causes of action of every nature and description whatsoever, including both known claims and Unknown Claims, as defined in ¶1.54 of the Stipulation and listed in ¶7 hereof, against Released Plaintiff Parties that arise out of or relate in any way to the institution, prosecution, or settlement of the claims against any Defendant in the Litigation, except for claims relating to the enforcement of the Settlement. "Released Defendants' Claims" do not include claims between or among Defendants or any combination of Defendants, including claims for indemnification.

5. "Released Plaintiff Party" or "Released Plaintiff Parties" means each and every Settlement Class Member and Plaintiff, Plaintiff's Counsel, and their Related Parties.

6. "Released Class Claims" means all claims, debts, actions, losses, rights, suits, sums of money, accounts, liabilities, reckonings, bonds, bills, covenants, contracts, controversies, agreements, promises, variances, trespasses, damages, judgments, awards, extents, executions, and demands whatsoever (including, but not limited to, any claims for damages, interest, attorneys' fees, expert or consulting fees, and any other costs, expenses, or liability), and causes of action of every nature and description, including both known claims and Unknown Claims (as defined in ¶1.54 of the Stipulation and ¶7 below), whether arising under federal, state, common, statutory, administrative, or foreign law, or any other law, rule, or regulation, whether in law or in equity, whether class or individual in nature, whether fixed or contingent, whether accrued or unaccrued, whether liquidated or unliquidated, whether matured or unmatured, whether direct, indirect, or inconsequential, whether suspected or unsuspected, which the Released Plaintiff Parties, in their individual capacities and/or in their capacities as purchasers of Loma American Depository Shares ("ADSs"), ever had, now has, or hereafter can, shall, or may have, whether in their own right or by assignment, transfer, or grant from any other person, thing, or entity that: (i) have been asserted in this Litigation by Lead Plaintiff or any other Settlement Class Member against any of the Released Defendant Parties; or (ii) could have been asserted in any court or

forum by Lead Plaintiff or any other Settlement Class Member against any of the Released Defendant Parties, that arise out of, are based upon, or relate in any way, directly or indirectly, to the allegations, transactions, facts, statements, matters or occurrences, representations, or omissions involved, set forth, or referred to in the Complaint or that relate to the purchase, acquisition, holding, sale, and/or disposition of Loma ADSs issued in or pursuant and/or traceable to Loma’s Initial Public Offering. Released Class Claims shall not include: (i) any claims relating to the enforcement of the Settlement; or (ii) any claims of any person or entity who or which submits a request for exclusion from the Settlement Class that is accepted by the Court.

7. “Unknown Claims” means (a) any and all Released Class Claims that any of the Released Plaintiff Parties do not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Parties, which, if known by him, her, or it, might have affected his, her, or its settlement with and release of the Released Defendant Parties, or might have affected his, her, or its decision(s) with respect to the Settlement, including, but not limited to, whether or not to object to the Settlement or seek exclusion from the Settlement Class; and (b) any and all Released Defendants’ Claims that any of the Released Defendant Parties do not know or suspect to exist in his, her, or its favor at the time of the release of the Released Plaintiff Parties that, if known by him, her, or it, might have affected his, her, or its settlement and release of the Released Plaintiff Parties. With respect to (a) any and all Released Class Claims and (b) any and all Released Defendants’ Claims, the Settling Parties stipulate and agree that, upon the Effective Date, the Settling Parties shall expressly waive, and each Released Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have expressly waived, the provisions, rights, and benefits of California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party;

and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code § 1542.

8. I (We) hereby warrant and represent that I (we) have not assigned or transferred, or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

9. I (We) hereby warrant and represent that I (we) have included information about (a) all of my (our) purchases or acquisitions of publicly traded or publicly listed Loma ADSs between November 1, 2017, and June 21, 2018, inclusive, (b) the total number of shares of publicly traded or publicly listed Loma ADSs I (we) purchased or otherwise acquired between June 22, 2018, and February 24, 2023, inclusive, (c) all of my (our) sales of publicly traded or publicly listed Loma ADSs between November 1, 2017, and February 24, 2023, and (d) the number of shares of publicly traded or publicly listed Loma ADSs I (we) held at the close of trading on February 24, 2023.

10. I (We) certify that I am (we are) NOT subject to backup tax withholding. (If you have been notified by the Internal Revenue Service that you are subject to backup withholding, please strike out the prior sentence.)

I (We) declare under penalty of perjury under the laws of the State of New York that all of the foregoing information supplied on this Proof of Claim by the undersigned is true and correct.

Executed this _____ day of _____
(Month/Year)

in _____
(City) (State/Country)

(Sign your name here)

(Type or print your name here)

(Capacity of person(s) signing,
e.g., Beneficial Purchaser or Acquirer,
Executor, or Administrator)

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.**

Reminder Checklist:

1. Please sign the above release and acknowledgment.
2. Remember to attach copies of supporting documentation.
3. **Do not send** originals of stock certificates or other documentation as they will not be returned.
4. Keep a copy of your Proof of Claim and all supporting documentation for your records.
5. If you desire an acknowledgment of receipt of your Proof of Claim, please send it Certified Mail, Return Receipt Requested.
6. If you move, please send your new address to the address below.
7. **Do not use red pen or highlighter** on the Proof of Claim or supporting documentation.

THIS PROOF OF CLAIM MUST BE POSTMARKED (FOR U.S. MAIL) OR RECEIVED BY THE PRIVATE CARRIER (FOR FEDEX, UPS, ETC.), OR RECEIVED ONLINE BY THE CLAIMS ADMINISTRATOR AT THE SETTLEMENT WEBSITE, NO LATER THAN APRIL 19, 2024, ADDRESSED AS FOLLOWS:

Loma Negra Securities Litigation Settlement
Claims Administrator
c/o A.B. Data, Ltd.
P.O. Box 173110
Milwaukee, WI 53217

www.LomaNegraSecuritiesLitigation.com (online portal)
info@LomaNegraSecuritiesLitigation.com

EXHIBIT B

Levi & Korsinsky, LLP Announces a Proposed Settlement in the Loma Negra Securities Litigation

NEWS PROVIDED BY
Levi & Korsinsky, LLP →
29 Dec, 2023, 10:00 ET

NEW YORK, Dec. 29, 2023 /PRNewswire/ --

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK: COMMERCIAL DIVISION

DAN KOHL, *et al.*,

Plaintiff,

v.

LOMA NEGRA COMPANIA INDUSTRIAL ARGENTINA SOCIEDAD ANONIMA, LOMA NEGRA HOLDING GMBH, SERGIO FAIFMAN, MARCO GRADIN, RICARDO FONSECA DE MENDONÇA LIMA, LUIZ AUGUSTO KLECZ, PAULO DINIZ, CARLOS BOERO HUGHES, DIANA MONDINO, SERGIO DANIEL ALONSO, BRADESCO SECURITIES INC., CITIGROUP GLOBAL MARKETS INC., HSBC SECURITIES (USA) INC., ITAU BBA USA SECURITIES, INC., MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED AND MORGAN STANLEY & CO. LLC,

Defendants.

Index No.
653114/2018
Part 53

Hon. Andrew
Borrok

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS or entities WHO purchased or otherwise acquired American Depository Shares of loma negra COMPAÑÍA INDUSTRIAL ARGENTINA SOCIEDAD ANONIMA ("loma" or the "company") pursuant or traceable to the Registration Statement and Prospectus issued

THIS NOTICE WAS AUTHORIZED BY THE COURT AND EXPLAINS HOW YOUR RIGHTS MAY BE AFFECTED BY A PROPOSED CLASS ACTION SETTLEMENT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.²

YOU ARE HEREBY NOTIFIED that a hearing will be held on April 10, 2024, at 2:00 p.m. before the Honorable Andrew Borrok, J.S.C., Supreme Court of New York, County of New York: Commercial Division, 60 Centre Street, Courtroom 238, New York, NY 10007, to determine whether: (1) the proposed Settlement of the above-captioned action (the "Litigation"), as set forth in the Stipulation of Settlement ("Stipulation"), for \$24,600,000 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Final Approval Order, as provided under the Stipulation, should be entered; (3) the Judgment, as provided under the Stipulation, should be entered following fulfillment of the conditions set forth in the Stipulation; (4) to award Plaintiffs' Counsel attorneys' fees and expenses out of the Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action ("Notice"), discussed below), and, if so, in what amount; (5) to grant an award to Plaintiff out of the Settlement Fund for his service on behalf of the Settlement Class or for his reasonable time, costs, and expenses directly relating to the representation of the Settlement Class, and if so, in what amount; and (6) the Plan of Allocation should be approved by the Court. The Court may adjourn or continue the Settlement Hearing or hold the Settlement Hearing by telephonic or video conference without further notice to members of the Settlement Class. Any change to the Settlement Hearing date, time, or manner will be posted on the settlement website (www.LomaNegraSecuritiesLitigation.com).

The Litigation is a consolidated securities class action against Loma and the underwriters for Loma's November 2017 IPO (collectively, "Defendants") for making allegedly untrue statements of material fact in the Registration Statement and Prospectus, filed with the U.S. Securities & Exchange Commission in connection with Loma's IPO (the "Offering Materials"), or omitting to state material facts required to be stated therein or necessary to make the statements therein not misleading.

acquired Loma's American Depository Shares pursuant and/or traceable to the Registration Statement and Prospectus incorporated therein, as amended, issued by Loma in connection with its November 2017 IPO (the "Settlement Class").

IF YOU PURCHASED OR OTHERWISE ACQUIRED LOMA AMERICAN DEPOSITORY SHARES (TICKER SYMBOL: "LOMA") pursuant or traceable to THE offering materials ISSUED IN CONNECTION WITH LOMA'S IPO, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THE LITIGATION.

To share in the distribution of the Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form so that it is **postmarked (for U.S. Mail) or received by the private carrier (for FedEx, UPS, etc.), or electronically by the Claims Administrator, no later than April 19, 2024**. Your failure to submit your Proof of Claim and Release by April 19, 2024, will subject your claim to rejection and preclude your receiving any of the recovery in connection with the Settlement of the Litigation. If you are a member of the Settlement Class and do not submit a Request for Exclusion from the Settlement, you will be bound by the Settlement and any judgment and release entered in the Litigation, including, but not limited to, the Judgment and the full and final release of all Released Claims as against the Released Defendant Parties, whether or not you submit a Proof of Claim and Release.

This Summary Notice provides only a summary of matters regarding the Litigation and the Settlement. If you have not received a copy of the Notice of Proposed Settlement of Class Action ("Notice"), which more completely describes the Settlement and your rights thereunder (including your right to object to or exclude yourself from the Settlement), and a Proof of Claim and Release, you may obtain these documents, as well as a copy of the Stipulation and other settlement documents, online at www.LomaNegraSecuritiesLitigation.com, or by writing to:

Loma Negra Securities Litigation Settlement

Claims Administrator

c/o A.B. Data, Ltd.

P.O. Box 173110

(877) 311-3744

Email: info@LomaNegraSecuritiesLitigation.com

Inquiries should NOT be directed to the Defendants, the Court, or the Clerk of the Court. Inquiries, other than requests for the Notice or a Proof of Claim and Release, may be made to Lead Counsel at:

LEVI & KORSINSKY, LLP
Shannon L. Hopkins
33 Whitehall Street, 17th Floor
New York, NY 10004
Telephone: (212) 363-7500

IF YOU DESIRE TO BE EXCLUDED FROM THE SETTLEMENT CLASS, YOU MUST SUBMIT A REQUEST FOR EXCLUSION SUCH THAT IT IS **POSTMARKED (FOR U.S. MAIL) OR RECEIVED BY THE PRIVATE CARRIER (FOR FEDEX, UPS, ETC.), OR ELECTRONICALLY BY THE CLAIMS ADMINISTRATOR, NO LATER THAN MARCH 20, 2024**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. ALL MEMBERS OF THE SETTLEMENT CLASS WHO HAVE NOT TIMELY REQUESTED EXCLUSION FROM THE SETTLEMENT CLASS WILL BE BOUND BY THE SETTLEMENT EVEN IF THEY DO NOT SUBMIT A PROOF OF CLAIM AND RELEASE.

IF YOU ARE A SETTLEMENT CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, PLAN OF ALLOCATION, REQUEST BY PLAINTIFF'S COUNSEL FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES, AND/OR AWARD TO PLAINTIFF FOR REPRESENTING THE SETTLEMENT CLASS. ANY OBJECTIONS MUST BE FILED WITH THE COURT AND SENT TO LEAD COUNSEL AND DEFENDANTS' COUNSEL SUCH THAT IT IS **POSTMARKED (FOR U.S. MAIL) OR RECEIVED BY THE PRIVATE CARRIER (FOR FEDEX, UPS, ETC.), OR (FOR COPIES SENT TO COUNSEL) RECEIVED ELECTRONICALLY, NO LATER THAN MARCH 20, 2024**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

DATED: NOVEMBER 30, 2023

BY ORDER OF THE SUPREME COURT OF
NEW YORK, COUNTY OF NEW YORK:
COMMERCIAL DIVISION

¹ Such Persons and entities may be members of the Settlement Class unless excluded under the terms of the Stipulation of Settlement.

² Unless otherwise defined herein, all capitalized terms shall maintain the same meaning as those set forth in the Stipulation, which can be viewed and/or obtained at www.LomaNegraSecuritiesLitigation.com.

SOURCE Levi & Korsinsky, LLP