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|  | TRANSPARENCY AND BUSINESS ETHICS POLICY - TBEP | Macro process: Strategic |
| | | Process: Quality |
| | | Code: CM-PO-003 |
| | | Version: 01 |
| Approved by: Manager | | Approval Date: December 2022 |

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GENERAL

This transparency and business ethics policy sets forth rules that regulate the behavior of company's officials. Although ethics is not coercive (it does not impose penalties), the transparency, business ethics and anti-corruption policy is an internal mandatory regulation that may have administrative sanctions under the law.

The transparency and business ethics policy of **INTERNATIONAL PHARMACEUTIC PRODUCTS S.A.S** will set forth internal Company rules to guide personal and professional development of people who work in the company at both the individual- and organizational-level.

The company **INTERNATIONAL PHARMACEUTIC PRODUCTS S.A.S** firmly believes in defending the standards of ethical behavior and intends that all collaborators conduct their activities following the principles of transparency, honesty and equity.

The Code of Transparency and Ethics of **INTERNATIONAL PHARMACEUTIC PRODUCTS S.A.S** is based on conduct guidelines that reflect the responsibilities to fulfill in the company in relation to Shareholders, suppliers, customers, government entities, and the community in general, to promote thus the development of relationships of mutual trust.

REGULATORY FRAMEWORK

This policy adopts and complies with regulations issued by the Superintendency of Companies related to the Code of Ethics and Prevention of International Bribery under Act 1778 of February 2, 2016, Article 23 and Article 26 second paragraph; Communication 100-000003 of July 26, 2016; Resolution 100-002657 of July 25, 2016 (Repealed); Resolution 200-000558 of July 19, 2018 (Repealed), Resolution 100-006261 of October 2, 2020 repealing Resolution 100-002657 of July 25, 2016 and Resolution 200-00558 of July 19, 2018 Issuing rules on the responsibilities of legal entities and their officials in terms of compliance with each of the requirements set forth in this Code.

PURPOSE

The company's transparency and business ethics policy aims to establish the rules, values and ethical principles that govern our daily behavior and relationships with our stakeholders, as well as the activities we carry out at **INTERNATIONAL PHARMACEUTIC PRODUCTS S.A.S – INPHAPRO SAS**.

This is a conduct framework that guides us in all those cases when ethical decisions must be made, ensuring the integrity of our actions.

It also establishes conflict resolution policies that promote the use of lower cost and more effective mechanisms, particularly prioritizing the interests of the State.

This policy aims to guide and transmit legal regulations and guidelines to all counterparties related to the company, including national or international customers, national or international suppliers, contractors, partners, employees, and Authorized Representatives; as well as to those people indirectly related to the company.

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SCOPE

This policy applies to all company employees at any hierarchical level, including those from senior-level or trustworthy employees, whether direct or agency workers, regardless of whether their salary is integral or ordinary.

The company Code of Ethics also applies to shareholders and all those people who are related to the company due to their main function.

DEFINITIONS

Confidentiality

Means the internal and external management of the Company's information related to both tangible assets (machinery, furniture, specific technology, etc.) and intangible assets (processes, planning, strategies, etc.).

Private Corruption

Occurs when a person promises, offers, grants or requests to, or accepts from directors, managers, officials or any other person directly or indirectly related to the company, for his/her own benefit or that of a third party either directly or through a third party.

Transnational Bribery

When a person directly or indirectly provides, promises or offers a foreign public servant any sums of money, object of monetary value, or any other advantage or benefit in exchange for the latter to perform, omit or delay acts related to the performance of his/her duties in connection with an international transaction or business.

Conflicts of Interest

Means the Company policies established regarding the management of institutional interests versus personal interests, involving the different stakeholders (employees, customers, suppliers, etc.).

Internal Conduct

All the behaviors and values that the organization encourages and values in daily work.

Compliance with Local Laws and Regulations

Means the Company obligations in terms of compliance with country laws and regulations and with provisions in agreements with customers, suppliers and stakeholders.

Business Favors / Gifts / Entertainment

Means the Company's policies regarding the exchange of gifts or something in gratitude between the Company and customers or suppliers, which clearly establish what gifts and presents are permitted and what are not.

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Employment of Relatives

Procedures that determine the Company's policies regarding the employment of relatives of Company employees, also including the parameters that will regulate the employment relationship of said relatives.

Information Technology

Means the policies related to the purchase and use of software, as well as the conditions of use of IT tools (websites, emails, etc.) and the type of information to be handled through these means.

Bribes

Means the Company's position against offering or accepting undue incentives (financial, privileges, personal favors, etc.) in exchange for the performance or omission of an act; as well as how to proceed if such situations occur.

Third-Party Information

The policy established by the Company regarding the management and use of third-party information (customers, suppliers, etc.), as well as the protection of their data and confidential information.

Safety / Hygiene / Workplace

Means the Company's position regarding the conditions in which people must perform their duties, including safety, hygiene and general conditions of the workplace.

Politics / Religion

The policy established by the Company regarding their relationship with political or religious institutions, as well as the guidelines regarding the relationship of their employees with these institutions.

PURPOSE OF THIS DOCUMENT

- ✓ Provide a concise and comprehensive guide for all Company operations regarding what we believe business ethics and ethical behavior should be.
- ✓ Provide guidelines that contribute to adoption of ethics in the daily administration of our business and different operational activities.
- ✓ Motivate Company officials to develop, maintain and promote the highest standards of ethical behavior in their professional relationships, both internally and externally.
- ✓ Contribute to the achievement of the Company vision, purposes and values.

ETHICAL PRINCIPLES AND VALUES

The quality of our decisions and actions are as important to us as the quality of our products and services. Ethical conduct requires the commitment of all our employees and leaders.

We all act with integrity, in accordance with applicable government laws, Company policies, and this Code of Ethics.

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The Company, Shareholders, Directors and other Employees, make up a team that works for the Country and its citizens and for the Company, and all our actions are guided by the following principles of conduct:

Integrity

We act with rectitude, integrity and honesty, trying to satisfy the legitimate interests of the Company, our customers, and the society.

We encourage to and clearly reject corruption in all areas of performance, and we strive to fully comply with current regulations.

Efficiency and Diligence

We strive to provide high-quality work, seeking the most appropriate and timely result and optimizing the resources to achieve the Company objectives and goals.

Suitability

We perform our work technically, legally and morally. We seek a solid professional development as required for each position by permanently receiving training in order to perform our work in the best way possible.

Truthfulness

We express ourselves authentically and sincerely in our labor relations with all Company members and third parties.

To follow the abovementioned principles and values, the Company adopts the transparency, business ethics and anti-corruption policy contained in sections below, which constitutes a behavior guide for all those people directly or indirectly related to the company:

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PRINCIPLES GOVERNING THE TRANSPARENCY, BUSINESS ETHICS AND ANTICORRUPTION POLICY

- ✓ For the purposes of this policy, ethics means doing the right thing, in the right way, for the right reasons; it includes behaviors, both personal and professional, in conducting business, as well as a set of organizational values and principles to guide decision making and actions to be taken, even in the absence of rules or policies.
- ✓ Ethical behavior is mandatory for everyone, regardless of their position in the Company. It is especially important that people in high positions set an example and demonstrate an unquestionable ethical behavior.
- ✓ The primary requirement in the commitment to act ethically is to respect Human Rights and the Constitution and laws that govern our country. We are also obliged to abide by the Company corporate policies, procedures, guidelines, practices, and other internal rules for operations carried out by the Company; however, the respect for the law is not enough, since legislation does not always tend to the highest standards of ethical behavior. Acting ethically is going beyond the law; it means to do what is and appears to be right and be fair, respectful, and responsible with our shareholders, colleagues, suppliers, customers and society.
- ✓ The Company requires us to act with honesty, integrity, transparency, mutual respect and a sense of fairness and responsibility in all our professional relationships, and that we demand the same from the people with whom we interact.
- ✓ None of our actions to promote ethical behavior in the Company should violate the letter or spirit of this transparency and anti-corruption policy or the rights of individuals or those of the Company.
- ✓ If a situation not expressly regulated by this policy occurs, the Company and their employees will be guided by the sense of honesty, equity, justice and mutual respect, and the general principles set forth in the Universal Declaration of Human Rights, the Constitution and the laws in the country, as well as the internal codes, rules, policies and procedures.

ETHICAL PRINCIPLES

Impartiality

We act with absolute political, economic or any other impartiality in the performance of our duties, showing independence from other persons, political parties or external institutions.

Transparency

We perform our work in total transparency, which implies that the citizens can access information related to all our acts through the mechanisms set forth in the Law, as well as any other related regulations.

We provide true, complete, accurate and timely information. In coordination with the Company directors, we report any relevant matter with an economic, financial, structural, legal or management impact related to the Company, in accordance with the legally established deadlines and means.

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Discretion and Confidentiality of Information

We maintain confidentiality of non-public facts, documents or information we become aware through the performance of our work that may affect Company's interests or influence transactions related to the Company.

We are obliged to protect and preserve the Company's assets by using those assigned for the performance of our duties wisely, avoiding their abuse, waste or wastage.

We do not use or allow others to use Company's assets for private purposes or purposes other than those for which they are specifically intended.

Responsibility

We perform our duties fully and comprehensively, assuming the role we perform with full respect. In extraordinary situations, we do not hesitate to carry out those tasks that due to their nature or kind are not strictly inherent to our position, provided that they are necessary to mitigate, neutralize or overcome any difficulties.

Employees are not only responsible for their own conduct, but also for reporting any violation of the principles and practices they may become aware.

Awareness of and Compliance with Regulations

We are fully aware of the Company's Code of Business Ethics and all our activities comply with current laws and internal rules set forth for the different procedures and labor policies.

ETHICAL PROHIBITIONS

Conflicts of interest

We do not seek to know, process or participate in decision-making related to any matter that may generate a conflict of interest, either directly or indirectly, where our personal, labor, economic or financial interests may compromise the performance of our duties and tasks.

We do not misuse the Company name, nor do we concurrently carry out commercial or professional activities that may in any way compete or conflict with those carried out in the Company.

If an official faces any conflict of interest, he/she must immediately report it in writing to their Department Manager and/or to the Company Directors, depending on his/her hierarchical level. Collaborators must always report when a conflict of interest situation occurs.

Employees at all levels of the company must put the performance of their obligations to the Company before their own interest.

Political Proselytism

No political proselytizing activities are allowed in connection with our work or through the use of the Company infrastructure, assets or resources, either in favor of or against political parties or organizations

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or candidates.

Misuse of Privileged Information

We are not allowed to engage in financial transactions or operations using the Company privileged information or information to which we may have access due to our condition or position. Nor can we disclose, use or allow the improper use of that information for the benefit of any private interest.

As we protect our information, we respect third-party information and do not obtain it through improper means or disclose it without authorization.

Acts Against Human Dignity

For no reason do we compel, threat or harass anyone in such a way that we affect their dignity and honor or induce them to carry out malicious or improper actions.

Gifts

We do not accept or request presents, money, gifts, entertainment or present or future benefits from any person, whether natural or legal, that may benefit in any way, directly or indirectly, from the compliance or non-compliance with current regulations.

Only gifts that have no commercial value or are consistent with the promotional or advertising practices of the entity granting them can be accepted.

Employees cannot use their position in the Company to request any kind of personal favor, payment, discount, travel, lodging, gifts or loans from suppliers, customers or stakeholders. These practices are prohibited.

If a valuable gift is given or received for courtesy in a business relationship, Management must be informed, and they will decide the gift final use.

ANTI-CORRUPTION AND ANTI-BRIBERY GUIDELINES

The Company does not tolerate any form of corruption. We do not believe that there is any justification for violating the ethical conduct of employees of other Companies. We do not do it and do not allow it. Therefore, we demand the same behavior from others.

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We do not promote, tolerate, or justify bribery. Bribery is understood as the offering of gifts, loans, fees, tips or any other benefit to any person as an incentive to act contrary to their legitimate and righteous interests.

We do not make facilitation payments, nor do we allow gifts to public officials, owners or employees of other Companies to speed up any normal process or approval, they are also considered a form of bribery and are therefore against this transparency and business ethics policy.

Bribing or allowing bribery is a dishonest practice prohibited by the Company and have punishable and employment consequences.

VALIDITY PERIOD, DISSEMINATION AND UPDATING

The contents of this policy will be valid for an indefinite term or until the Company is dissolved in accordance with Articles of Incorporation. Contents will be disseminated through training and will be published for consultation on the Company Website.

The Office of the Quality Coordinator will be responsible for updating contents when necessary.

BRIBERY OR CORRUPTION SITUATIONS

- ✓ Receiving money or valuable gifts from suppliers, customers or government entities.
- ✓ Offering employees, directors, government entities, or third parties related to the activity, any commissions or money, luxurious gifts, business offerings such as travel expenses, show or event tickets, especially when these offerings or gifts are disproportionate.
- ✓ Providing technical support to exercise undue influence.
- ✓ Deliver company's confidential information to carry out illegal activities.
- ✓ Issuing erroneous accounting or financial records.
- ✓ Omitting or hiding accounting or financial information related to fraud, bribery or corruption situations.
- ✓ Hiring employees, suppliers, agents, consultants, advisers, and other third parties that may be involved in illegal activities.
- ✓ Making donations to public charities either in cash or in kind, expecting a benefit in return.
- ✓ Making facilitation payments and political contributions.

OUR CORPORATE VALUES

Commitment: Means the fidelity to the company, service, and co-workers, and the loyalty to the stakeholders.

Responsibility: Perform our role with diligence, reliability and prudence, assuming the consequences of our actions and choices; comply with our commitments and obligations; and anticipate the effects of our behavior and correct it based on said anticipation.

Respect: Recognize the value of people and accept the diversity of thought, beliefs, differences, identities and decisions of the human being.

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Teamwork: Means understanding that challenges are faced by working together and that each member of the team contributes with their knowledge, attitudes and abilities.

Mission

Help patients access breakthrough therapies that provide them with well-being and improve their quality of life.

Vision

We offer alternatives and differential value that positively impact the quality of life of patients, families and caregivers.

Our Social Objective

At INPHAPRO S.A.S, we are committed to being a socially responsible company with our employees, the environment and the society.

We demonstrate our commitment through our actions, which are focused on three main pillars: good ethical, social, and environmental practices.

Employment Conditions

We take measures aimed at reconciling family and work life and maintaining cordial and respectful manner in all aspects.

Respect for human rights.

Respect for children's rights.

Respect for current legislation.

Total rejection of forced labor.

Rejection of child labor.

Equality and diversity: Rejection of discrimination of any kind (race, skin color, nationality or ethnic origin, age, religion, disability, gender, sexual orientation, political affiliation, or any other characteristic protected by current labor laws).

ETHICAL GUIDELINES

Customers and Consumers

Our objective is to market our products by providing Quality and seeking to meet customer expectations.

We have a Quality System to ensure quality of processes by complying with good environmental practices for the prevention and care of the environment.

We comply with quality requirements for our service as well as the commitments assumed with our

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customers in order to meet or exceed their expectations, we respect the contracts under the law and answer service requests promptly, carefully and reliably.

Environment

The Company encourages compliance with the environmental regulations governing us and manages the development of viable alternatives to help the environment that go together with our activities without harming the well-being of the community.

Our Company seeks to maintain cordial and cooperative relations with the community taking into account their opinions and suggestions regarding environmental issues, always seeking the common good.

Management of Hazardous Waste is performed by our Third Party Logistics Provider by using a duly authorized company for hazardous waste disposal. In addition, we have a program for proper waste management.

Electronic waste and batteries are delivered to companies in charge of their final disposal.

We raise awareness among our employees about saving and using energy efficiently by turning off the computer when not in use.

Human Rights

Our activities are aimed at positively influencing society, enabling the Company to become a benchmark in ethical behavior and social responsibility, by decisively contributing to local, regional and national development through innovation, continuous improvement and teamwork.

Product

The effectiveness and efficiency in our work and processes are essential for the achievement of our objectives, which can only be achieved by responsibly performing our duties with commitment to the Company and acting honestly at all times.

We systematically improve the efficiency of our processes, activities and services by optimizing resources, costs and time.

Social Responsibility

We strive to operate the Company and carry out Company activities safely and efficiently, with responsibility towards the community and the environment, based on a cohesive teamwork between employees and suppliers.

We build relationships of trust between all our team members and with our different stakeholders, based on mutual respect and seeking a harmonious and fair coexistence between all parties.

We contribute to sustainable development in each of the communities related to our operations, always

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ensuring the preservation of the environment and implementing initiatives that contribute to a greater business development.

The company will always evaluate, based on the principles set forth in this policy, any real connection between a possible sponsorship and our business objectives, ensuring compliance with the registration, authorization, and documentation processes.

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ANTI-CORRUPTION PRACTICES

If we find evidence of any improper practice, pertinent legal disciplinary actions and those set forth in the Internal Labor Regulations will be applied, and the employment relationship may be terminated. Likewise, the suppliers, customers, or people who may be involved in such practices will be reported to the pertinent authorities.

Commercial advantages are strictly based on technical aspects and the Company level of competitiveness, any illegal or unfair practice to obtain commercial advantages for the Company is expressly prohibited.

We are not involved in any activity that could be related to money laundering, terrorism financing and financing of proliferation of weapons of mass destruction.

We are aware that taxes contribute to the income of the Public Treasury and allow us to implement programs that benefit the country; therefore, we pay taxes timely according to the criteria set forth in current legislation. No tax evasion practice is allowed.

Personnel is selected through transparent processes which involve internal and/or external personnel according to the profile, the position characteristics, and the best qualification required based on candidate's ability to perform the position.

We act with honesty and integrity in all the procedures conducted with authorities and public officials, ensuring that all information and certifications we submit, as well as the statements we make are true, clear and complete.

All Company employees must remain vigilant in identifying and reporting conducts that violate this policy, raise concerns, or seek advice on ethical issues, which can be reported directly through the following mechanisms:

Employees: Employees can report to their line manager or a member of Management.

Customers and suppliers: by calling 57 (601) 7037090, or by email admon@inphaprogroup.com

BRIBERY OR TRANSNATIONAL CORRUPTION

The Company promotes a culture of transparency and integrity in which transnational bribery and corruption are considered unacceptable, Senior Management is committed to prevent transnational bribery by evaluating the risks related to imports or exports.

In accordance with the foregoing, employees who carry out both import and export operations are governed by a policy aimed at preventing transnational bribery and other corrupt practices and law enforcement.

We know that risk increases in countries that require intermediaries to carry out international businesses or transactions according to local customs and regulations; for this reason, it is this Company's policy to investigate and request to the relevant entities the legal history of the intermediaries required for these operations.

SECURITY PROCESSES AND REPORTING

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- ✓ The Company has reporting means such as the virtual mailbox on our website, which employees, customers and suppliers can access and where information will be collected weekly for analysis and processing. The compliance officer will be the person responsible for these reports and queries in mailboxes.
- ✓ As a prevention strategy, the company has the following email admon@inphaprogroup.com and phone number 57 (601) 7037090, to which all collaborators, regardless of their position, and other external stakeholders can communicate questions or requests for advice in relation to compliance with this transparency and business ethics policy, as well as to report any conduct classified as a form of bribery or corruption. We receive these queries and reports ensuring the information confidentiality, preserving the anonymity, and checking that information related to events reported is real and verifiable.
- ✓ If an official, customer or supplier does not want to report any anomaly due to bribery or corruption to the Company, they can report it directly to the external entities intended for that purpose, e.g., Attorney General's Office or superintendencies, by attaching the corresponding evidence supporting the event.
- ✓ Inquiries about documents, policies, procedures, and guidelines can be made by email admon@inphaprogroup.com
- ✓ We ensure total confidentiality, impartiality, discretion, and absolute integrity by the system and Human Resources when receiving reports and a proper follow-up.

ASSESSMENT AND IDENTIFICATION OF CORRUPTION RISKS

- ✓ We have several processes documented that allow us to identify risk factors in illegal situations such as bribery, fraud or corruption, or any suspicious or unusual behavior by our employees, customers, suppliers, shareholders or any natural or legal person who have a contractual or legal business with the company.
- ✓ We carry out a risk review and assessment annually, or whenever a risk is identified.
- ✓ This review is carried out by leaders of each process supported by the quality management system program representatives based on the guidelines of manuals and policies established for each process.

IMPLEMENTATION OF ANTICORRUPTION CONTROLS

Identification of risks for each area, transaction, project or any other specific activity is carried out following the steps below:

1. Risk identification: Information from external sources such as control entities, international lists, national lists, Attorney General's Office, national police, etc. will be used to prepare a list of risks including the source or triggering circumstance.
2. Determining the impact and probability: The impact and probability of occurrence will be determined for each of the identified risk events according to their characteristics and type of action.
3. Measurement and control: The risks identified in each process will be measured and controlled by employees responsible for each process according to their duties.

Once the risks are identified, the possible causes are established, and controls and impact they have on each of the identified departments are determined.

The person responsible for the process must inform all department collaborators of the identified risks and controls.

The company has defined procedures for proper document management and custody, which ensure the information integrity, updating, timeliness, reliability, traceability, confidentiality and availability.

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All employees are responsible for implementing controls in order to minimize the occurrence of risks using the different existing manuals for each process.

RISK CONTROL

- ✓ Suspicious and unusual activities, both internal and external, are reported in established forms to the compliance officer so that he/she can report to the Unit of Financial Information and Analysis (UIAF), if applicable.
- ✓ An external Statutory Auditor verifies the precision and transparency of accounting and financial records, as well as compliance with the different processes in each of the operations.
- ✓ We have a process for evaluating suppliers, customers and employees used to select and rate each one of them according to our established policies before establishing the corresponding relationship relying on the different company rules.
- ✓ Selection and hiring of personnel is carried out carefully and safely, complying with legal requirements and security controls established in our Selection and Training process.
- ✓ We carry out training and awareness events about fraud, identification of suspicious and unusual activities, and analysis and identification of risks at least once a year. During the onboarding process, we also inform new employees of mandatory policies and controls established in the Company.
- ✓ We have entered into security and confidentiality agreements with Company suppliers, customers, and officials.
- ✓ We carry out controls on our customers, suppliers and officials, through searches in credit bureaus; national and international lists of money laundering, terrorism financing and financing of proliferation of weapons of mass destruction; and government websites such as police and Attorney General's Office websites.
- ✓ Evaluation of accounts payable and accounting to identify payments to third parties and verify that payments correspond to the contracted services.
- ✓ We have sufficient and appropriate communication channels that ensure confidentiality when reporting activities related to transnational bribery or any other corrupt practices.

INFORMATION MANAGEMENT

All existing information and information generated by the Company is confidential. Therefore, collaborators are not authorized to disclose it to third parties without prior authorization from their line managers; all employees who, due to their position, have access to confidential or privileged information, or information that could cause harm to the Company if disclosed, must refrain from disclosing such information to third parties or using it for personal benefit.

For the management and disclosure of our databases we harmoniously and comprehensively apply all the principles laid down in Article 4 of Statutory Law 1581 of 2012, for the purposes of the development, interpretation and enforcement thereof.

Distorting records and/or accounting information or falsifying operations, either to simulate the fulfillment of goals or objectives or to obtain some personal benefit, is prohibited.

All the information generated in our financial and accounting records is confidential and can only be disclosed to users duly authorized by Banks or State Entities.

Directors and collaborators must take the necessary measures to protect confidential information we have access to in order to prevent it from being disclosed to unauthorized persons.

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COMPUTER EQUIPMENT

Computer equipment users are responsible for protecting them, including screens, CPU, disk storage, removable media, modems, software and information systems.

Computers must not be used for a purpose other than a work tool. They should not be used for any type of personal work unless expressly authorized by line manager.

Computer users are not allowed to install unauthorized software.

Each user must have a password to access the systems. Additionally, installed software with restricted access must have a password. Access code is personal, and user must not to disclose it.

Passwords used by Information Technology Department for system administration are handled under strict confidentiality.

Computers must not be used by people other than their user; if the computer is to be left unattended, it should be turned off and screensaver password protection enabled.

User is responsible for any damage, destruction or theft of the computer equipment or the information contained in it, due to the user's carelessness or negligence to protect it during daily use.

All employees who work in the company and are assigned a computer, whether a laptop, cell phone or desktop computer, are responsible for and must safeguard the information that these computers contain in relation to the company, and must be governed by the computer security handbook published on the intranet.

RELATIONSHIP WITH SUPPLIERS

Without exception, we only hire for the provision of services suppliers registered with the Chamber of Commerce and the DIAN, whether they are natural or legal persons and regardless their nature and the contract subject matter.

In relation to suppliers abroad, we only work with those duly authorized by the Company's General Manager.

The acquisition of goods and services is carried out through homogeneous and transparent processes that ensure equitable participation and an impartial selection of suppliers based on quality, profitability, care for the environment, social performance and service criteria.

The documented process GC-PR-01 states that all acquired or contracted products and services must have the lowest possible environmental impact; for this reason, suppliers are requested technical data sheets of their products and safety sheets, if necessary, and Quality Management System evaluates the potential environmental impacts of these products.

We take into account those suppliers that continuously carry out activities for the environmental preservation

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and improvement in accordance with the principles of sustainable development; are committed to the preservation and sustainable use of the natural resources they use; and minimize negative impacts on the environment.

Social performance is an important factor to take into account when selecting suppliers, e.g., measurement of effectiveness in achieving social objectives and creating value for customers and implementation of a system of prevention of illegal activities, such as anti-bribery or anti-fraud and fair treatment policies, fair pricing, consumer protection, and transparent pricing practices.

When we enter into contracts with suppliers, whether they are natural or legal persons or are related to or are relatives of a company employee, the evaluation and qualification process is be the same used to select any other supplier.

Any contract, agreement or relationship bounding the Company can only be executed by the Authorized Representative, an alternate, or the person designated by Management for that purpose, and the corresponding insurance policies must be obtained according to the nature of the contract.

CONSEQUENCES OF BREACHING THE TRANSPARENCY AND BUSINESS ETHICS POLICY

The contents of this transparency and business ethics policy is an integral part of employment contracts, they are part of the obligations and responsibilities of all Company directors and collaborators related to their duties and position.

Failure to perform the obligations set forth in this policy is a **SERIOUS OFFENSE** under the terms set forth in Internal Labor Regulations and Employment Contract, it may constitute a just cause for the contract termination. Sanctions for non-compliance with the provisions contained in this Code of Ethics will be imposed in accordance with the provisions of the Internal Labor Regulations (Chapter 1, Article 1).

Sanctions or disciplinary actions will be imposed on employees involved in any corrupt practice or breach of the provisions contained in this transparency and business ethics policy.

The company will not pay any expenses for the defense of employees or representatives in relation to sanctions imposed due to the violation of rules set forth in this transparency and business ethics policy.

All Company employees undertake to comply with this transparency, business ethics and anti-corruption policy. Failure to read this Code does not exempt employees from complying with the terms established herein.

APPLICATION OF TRANSPARENCY AND BUSINESS ETHICS POLICY

Following the principles set forth in this policy may not always be clear and can often lead to facing difficult decisions or uncertainty about the appropriate course of conduct. In these circumstances, we must seek advice from our direct manager, or in more difficult cases, from Senior Management.

ADMINISTRATIVE SANCTIONS

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The Superintendency of Companies will impose one or more of the following sanctions on legal persons that engage in conducts as set forth in Article 2 of Act 80 of 1993. Sanctions will be imposed by a reasoned resolution in accordance with the graduation criteria set forth in Article 7 of Act 80 of 1993:

1. Fine of up to two hundred thousand (200,000) current legal monthly minimum wages.
2. Disqualification to enter into contracts with the Colombian State for up to twenty (20) years. The disqualification to enter into contracts with the State will start from the date on which the sanction resolution is considered final. This disqualification will be imposed on legal persons in accordance with Article 8 of Act 80 of 1993.
3. Publication in widely circulated media and posting of an excerpt from the sanction resolution on the sanctioned legal person website for a maximum period of one (1) year. The sanctioned legal person will assume the costs of that publication.
4. Prohibition of receiving any type of incentive or subsidies from the Government for a 5-year period.

Juan Alejandro Vargas Zapata
Authorized Representative