ACEROS TURIA
COLOMBIA

ACEROS TURIA DE COLOMBIA S.A.S.

TRANSPARENCY AND BUSINESS ETHICS PROGRAM

Introduction

The Transparency and Business Ethics Program of **ACEROS TURIA DE COLOMBIA S.A.S.** (hereinafter "Aceros Turia"), in accordance with the identification of risks related to Corruption and Transnational Bribery, establishes guiding components for the interaction among all stakeholders and with the company. It outlines behaviors that arise from the dynamics of the business, which present significant challenges in fulfilling the company's business, social, economic, and environmental objectives, while firmly rejecting any acts involving corrupt or bribery-related practices.

In light of the above, this Manual supports the inclusion of behavioral and conduct guidelines to be adopted by all employees of the company in alignment with its corporate principles and values, allowing Aceros Turia to position itself as an ethical benchmark for current and future stakeholders within the scope of its operations.

This document serves as a vital guiding tool for developing and promoting ethics at both the personal and organizational levels, especially in the face of the ever-changing market landscape.

The purpose of the Program is to declare our commitment as a company to act ethically and transparently, basing all business practices on respect, responsibility, honesty, and integrity. Accordingly, and based on the company's needs, fundamental pillars have been jointly established to enable the prevention, detection, and response to potential risks of Corruption or Bribery, thereby contributing to the achievement of our goals:

- Establish general guidelines and directives that facilitate the identification and management of scenarios or situations where corruption and/or bribery risks may arise.
- Disseminate the Transparency and Business Ethics Program to all members of Aceros Turia, as well as the channels and mechanisms available to report or communicate any irregular conduct or practice that contravenes and may be considered a violation of the Program.
- Define the responsibilities within the different areas of the company—at the executive, administrative, and operational levels—regarding ethical conduct and social, economic, and environmental responsibility.

Glossary

For the purposes of implementing the Transparency and Business Ethics Program, the following definitions must be taken into account:

Total Assets: All current and non-current assets recognized in the statement of financial position, representing the economic resources currently controlled by the Company.

Associates: Individuals or legal entities who have made contributions in money, labor, or other assets of monetary value to a company or sole proprietorship in exchange for shares, equity interests, or any other form of participation allowed under Colombian law.

Compliance Audit: A systematic, critical, and periodic review of the proper implementation and execution of the TBEP.

Conflict of Interest: A situation in which the personal interests—direct or indirect—of any employee of the Company, or their relatives or close contacts, conflict with the interests of the Company or interfere with the employee's duties and may lead to conduct contrary to the proper fulfillment of their contractual or labor obligations.

Whistleblower Channel: The online reporting system for acts of Transnational Bribery, provided by the Superintendency of Companies on its website.

Contractor: In the context of a business or transaction, refers to any third party providing services to a Company or having any kind of contractual legal relationship with it. Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants, and parties to cooperation agreements, temporary partnerships, consortia, or joint ventures with the Company.

State Contract: As defined in Article 32 of Law 80 of 1993.

Corruption: Any conduct aimed at benefiting a Company, seeking a benefit or interest, or using the Company as a means to commit crimes against public administration or property, or to engage in acts of transnational bribery.

Basic Legal Circular: The Basic Legal Circular No. 100-000005 of 2017 issued by the Superintendency of Companies, including any amendments.

Due Diligence: In the context of this Program, refers to the ongoing and periodic review and assessment process that the Obligated Entity must perform according to the Corruption or Transnational Bribery Risks to which it is exposed. It does not refer to due diligence procedures used in other risk management systems (e.g., money laundering, terrorism financing, and proliferation of weapons of mass destruction), which are governed by different regulations.

Ethics: The set of principles, values, and rules that enable the formation of social groups and ensure their continuity.

Business Ethics: How a company integrates its principles and values into the ethical structures of the social group it belongs to, thus becoming an ethical entity within society.

Employee: An individual who is obligated to provide a personal service under an employment contract or service agreement with a Company or any of its Subsidiaries.

Company: A commercial company, sole proprietorship, or foreign company branch under the supervision of the Superintendency of Companies, as per Articles 83, 84, and 85 of Law 222 of 1995.

Obligated Entity: The Company identified under the applicable regulation, in this case, ACEROS TURIA DE COLOMBIA S.A.S.

Risk Factors: Possible elements or causes that may generate a Corruption/Transnational Bribery Risk for any Supervised Entity.

International Businesses or Transactions: Any kind of business or transaction with foreign individuals or legal entities, either public or private.

Risk Matrix: A tool that enables the company to identify Corruption Risks or Transnational Bribery Risks.

OECD: The Organisation for Economic Co-operation and Development.

Compliance Officer: The individual responsible for performing the functions and duties established in this Program. The same individual may, if approved by the highest corporate body of Aceros Turia and legally permissible, assume roles in other risk management systems, such as those related to anti-money laundering, terrorism financing, and the financing of the proliferation of weapons of mass destruction.

Related Parties: Individuals, groups, or organizations that have an interest in the Company's activities (clients, employees, partners, investors, suppliers), as they are directly or indirectly affected by the Company's actions, and whose actions may also affect the Company.

Politically Exposed Person (PEP): As defined in Article 2.1.4.2.3 of Decree 1081 of 2015, as amended by Article 2 of Decree 830 of July 26, 2021.

Ethical Principles: The explicit or implicit foundations upon which the company's ethical concepts are built.

Transparency and Business Ethics Program (TBEP): The document that outlines the Compliance Policy and specific procedures under the responsibility of the Compliance Officer, aimed at implementing the Compliance Policy to identify, detect, prevent, manage, and mitigate Corruption Risks or Transnational Bribery Risks that may affect Aceros Turia, based on the Risk Matrix and other instructions and recommendations established in this Program.

Compliance Policies: The general policies adopted by the Company to conduct its business and operations in an ethical, transparent, and honest manner; and to identify, detect, prevent, and mitigate Corruption Risks or Transnational Bribery Risks.

Economic Resource: A right that has the potential to produce economic benefits.

C/TB Risks: Corruption Risk and/or Transnational Bribery Risk.

Corruption Risks: The possibility that, through action or omission, the purposes of public administration are diverted, or public assets are affected for private benefit.

Transnational Bribery Risks (TB Risks): The possibility that a legal entity, directly or indirectly, gives, offers, or promises to a Foreign Public Official money, items of pecuniary value, or any benefit or utility in exchange for that official performing, omitting, or delaying any act related to their duties and in connection with an International Business or Transaction.

Foreign Public Official: As defined in paragraph 1 of Article 2 of Law 1778.

Subsidiary Company: As defined in Article 260 of the Colombian Commercial Code.

Transnational Bribery (TB): As defined in Article 2 of Law 1778.

Supervised Company: A company, sole proprietorship, or branch of a foreign company under the supervision of the Superintendency of Companies, in accordance with Article 84 of Law 222 of 1995.

Regulatory Framework

International Standards and Regulations

- Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
- Inter-American Convention against Corruption by the Organization of American States (OAS)
- Criminal Law Convention on Corruption by the Council of Europe
- Civil Law Convention on Corruption by the Council of Europe
- African Union Convention on Preventing and Combating Corruption
- United Nations Convention against Corruption (UNCAC)

National Regulations

- External Circular 100-000011 of August 9, 2021
- Law 1778 of 2016
- Law 222 of 1995
- Decree 1736 of 202
- And any other regulations that amend, supplement, or complement them

General Considerations of the Transparency and Business Ethics Program

Scope of Application

The Transparency and Business Ethics Program is intended to be observed and complied with by the highest corporate body, the manager, all employees, contractors, and subcontractors of Aceros Turia, regardless of their roles or responsibilities. Its aim is to ensure that, in the course of their duties, they prioritize the principles, values, and guidelines set forth herein over commercial goals or strategies, fostering corporate transparency supported by top management.

In addition, its scope extends to all stakeholders, who are jointly responsible for the proper implementation and practice of the Transparency and Business Ethics Program.

Objectives

- Promote ethical conduct and responsibility among all employees, clients, suppliers, shareholders, the highest corporate body, and other third parties connected with Aceros Turia, while ensuring respect for the rules and regulations governing the Company's activities.

- Integrate ethical behavior into the company culture as a conviction for doing the right thing.
- Manage the human team that makes up the company to ensure the continuous improvement of processes, with a foundation in corporate, social, economic, and environmental responsibility.

Commitment

At Aceros Turia, we are committed to ethical and transparent conduct. Guided by honesty, integrity, and dedication to human well-being, we aim to build a prosperous future for our employees, clients, and society at large.

For this reason, we pledge to conduct business in a socially responsible manner, upholding a zero-tolerance philosophy—starting with top management—toward acts that contradict established norms, best practices, and international standards of organizational governance.

Fundamental Principles and Rights at Work

At Aceros Turia, we regard work as a fundamental pillar of human development, as it contributes to individual dignity and well-being, allowing people to develop their skills and talents, contribute to society, feel part of a team, and build a life project.

We therefore recognize and defend everyone's right to work, ensuring compliance with the legal provisions that protect this right. We are committed to creating a dignified and safe work environment where individuals can grow professionally, be appreciated for their talents and efforts, and balance their work and personal lives—key factors in building an integrated self and a more just and prosperous society.

Corporate Culture

Firm in our belief that a strong corporate culture is the foundation of long-term success, we are committed to meeting our clients' needs by providing memorable experiences, supported by highly trained staff who are shaped and guided by the company in accordance with its mission, vision, and corporate values.

Our goal is to continue fostering and expanding a culture of corporate transparency, which allows us to remain the preferred choice for our stakeholders thanks to the distinctive and outstanding quality of our services. This aligns with our social responsibility to our environment and includes efficient use of business tools, support for continuous improvement programs, innovation, and quality.

Practices Contrary to Transparency and Business Ethics

The following practices are considered contrary to the Transparency and Business Ethics Program:

Bribery

Bribery is defined under Article 444 of Law 599 of 2000 and its subsequent amendments or supplements, stating:

"**ARTICLE 444. BRIBERY**. *[Amended by Article 31 of Law 1474 of 2011.]* Whoever gives or promises money or any other benefit to a witness in order to induce them to lie or to withhold information in their testimony, either fully or partially, shall face imprisonment of six (6) to twelve (12) years and a fine of one hundred (100) to one thousand (1,000) legal monthly minimum wages."

Transnational Bribery

Transnational bribery, under the terms of this Program, is defined in Article 2 of Law 1778, which provides:

"**ARTICLE 2. Administrative liability of legal persons**. Legal persons who, through one or more: (i) employees, (ii) contractors, (iii) administrators, or (iv) associates—either of their own or of any subordinated legal entity—give, offer, or promise, directly or indirectly, to a foreign public official: (i) sums of money, (ii) any item of pecuniary value, or (iii) another benefit or utility, in exchange for that official performing, omitting, or delaying any act related to their official duties in connection with an international business or transaction (...)."

Aceros Turia's business practices are based on commercial principles and should not be influenced by bribery, gifts, or payments aimed at achieving results, gaining favor, or securing personal or third-party benefits. Therefore, offering or accepting any improper payment or gift is strictly prohibited.

Aceros Turia does not accept gifts, gratuities, or courtesies from stakeholders intended to secure favorable treatment or influence business decisions based on anything other than transparency and legality.

Similarly, Aceros Turia employees are not permitted—directly or indirectly—to offer or arrange for clients or suppliers to receive gifts or courtesies intended to influence business decisions.

Corruption

For the purposes of this Program, corruption is defined in Article 250-A of Law 599 of 2000 and its amendments, which states:

"**ARTICLE 250-A. PRIVATE CORRUPTION**. *[Added by Article 16 of Law 1474 of 2011.]* Whoever, directly or through an intermediary, promises, offers, or grants to executives, administrators, employees, or advisors of a company, association, or foundation, an undue gift or benefit in order to receive favorable treatment for themselves or a third party, to the detriment of that entity, shall face imprisonment of four (4) to eight (8) years and a fine of ten (10) to one thousand (1,000) legal monthly minimum wages in force.

The same penalties apply to any executive, administrator, employee, or advisor of such an entity who, directly or through an intermediary, receives, solicits, or accepts such an undue gift or benefit to the detriment of the organization.

If the conduct results in financial harm to the entity, the penalty shall be six (6) to ten (10) years of imprisonment."

In this regard, corruption includes any conduct intended to benefit the company or to serve as a means to commit crimes against public administration, public property, or transnational bribery.

General Considerations of the Transparency and Business Ethics Program

Scope of Application

The Transparency and Business Ethics Program is intended to be observed and complied with by the highest corporate body, the general manager, all employees, contractors, and subcontractors of Aceros Turia, regardless of their roles and responsibilities. Its purpose is to ensure that, in the performance of their duties, they prioritize the principles, values, and guidelines set forth herein over the achievement of commercial goals or strategies, thereby fostering corporate transparency with the support of Top Management.

Additionally, its scope extends to all stakeholders, who share responsibility for the proper and effective implementation of the Transparency and Business Ethics Program.

Objectives

- Promote ethical conduct and responsibility among all employees, clients, suppliers, shareholders, the highest corporate body, and other third parties related to Aceros Turia, as well as respect for the rules and regulations governing the Company's activities.
- Integrate ethical behavior into the company culture as a conviction to act with integrity.
- Manage the human team that comprises the company with the aim of ensuring

the continuous improvement of processes, guided by corporate, social, economic, and environmental responsibility.

Commitment

At Aceros Turia, we are committed to ethical and transparent conduct. Guided by honesty, integrity, and a strong commitment to human well-being, we aim to build a prosperous future for our employees, clients, and society as a whole.

For this reason, we pledge to conduct our business in a socially responsible manner, with a zero-tolerance philosophy—starting from top management—toward actions that violate regulations, good practices, and international organizational management guidelines.

Fundamental Principles and Rights at Work

At Aceros Turia, we regard work as a cornerstone for the comprehensive development of individuals, as it contributes to dignity and well-being, allows people to develop their skills and talents, contribute to society, feel part of a team, and build a life project.

Therefore, we recognize and defend everyone's right to work, ensuring compliance with the legal provisions that protect this right. We strive to create a dignified and safe work environment where each person can grow professionally, be valued for their talent and effort, and balance their work and personal life—essential factors for building whole individuals and a more just and prosperous society.

Corporate Culture

We are convinced that a strong corporate culture is the foundation of long-term success. We work to meet our clients' needs by providing memorable experiences, delivered by highly trained personnel, guided by the company's mission, vision, and corporate values.

Our goal is to continue fostering and expanding a culture of corporate transparency, enabling us to remain a preferred partner for stakeholders thanks to the distinctive and exceptional quality of our services. This is aligned with our social responsibility and involves efficient use of corporate tools, contributing to the implementation of continuous improvement, innovation, and quality programs.

Practices Contrary to Transparency and Business Ethics

The following practices are considered contrary to the Transparency and Business Ethics Program:

Bribery

Bribery is defined in Article 444 of Law 599 of 2000 and its amendments, which states:

ARTICLE 444. BRIBERY. *[Modified by Article 31 of Law 1474 of 2011.]* Whoever gives or promises money or any other benefit to a witness to induce them to lie or partially or totally withhold the truth in their testimony shall be sentenced to six (6) to twelve (12) years in prison and fined between one hundred (100) and one thousand (1,000) legal monthly minimum wages."

Transnational Bribery

Under this Program, transnational bribery is defined in Article 2 of Law 1778:

"ARTICLE 2. Administrative liability of legal persons. Legal persons that, through one or more of the following: (i) employees, (ii) contractors, (iii) administrators, or (iv) associates—either their own or from any subsidiary legal entity—give, offer, or promise to a foreign public official, directly or indirectly: (i) money, (ii) any item of pecuniary value, or (iii) another benefit or utility, in exchange for that official performing, omitting, or delaying any act related to their official duties and in connection with an international business or transaction (...)."

Business practices at Aceros Turia are based on commercial criteria and must not be influenced by bribes, gifts, or payments aimed at securing results, favorable treatment, or benefits for oneself or others. Therefore, it is strictly prohibited to offer or accept any improper payment or gift.

Aceros Turia does not accept gifts, gratuities, or favors from stakeholders intended to influence business decisions or gain favorable treatment contrary to transparency and legality.

Likewise, Aceros Turia employees are not permitted, directly or indirectly, to offer or facilitate the offering of gifts or favors to clients or suppliers that aim to influence business decisions.

Corruption

For the purposes of this Program, corruption is defined in Article 250-A of Law 599 of 2000 and its amendments:

"ARTICLE 250-A. PRIVATE CORRUPTION. *[Added by Article 16 of Law 1474 of 2011.]* Whoever, directly or through an intermediary, promises, offers, or grants an unjustified gift or benefit to executives, administrators, employees, or advisors of a company, association, or foundation in order to gain favor for themselves or a third party, to the detriment of said entity, shall be sentenced to four (4) to eight (8) years in prison and fined between ten (10) and one thousand (1,000) legal monthly minimum wages.

The same penalties apply to any executive, administrator, employee, or advisor of such entities who, directly or through another person, receives, solicits, or accepts such an unjustified gift or benefit to the detriment of the organization.

If the conduct results in economic harm to the company, association, or foundation, the sentence shall be six (6) to ten (10) years."

Accordingly, all conduct that seeks to benefit the company, pursue an interest, or use the company as a means to commit crimes against public administration or property, or to engage in transnational bribery, is prohibited.

Relationships

At Aceros Turia, all individuals are responsible for being aware of and promptly implementing any legal or regulatory updates that are communicated to them or that they must put into practice. They must also be familiar with the regulations applicable to our business and ensure that our counterparts comply with them as well.

Relationship with Our Clients

We serve our clients with honesty and integrity in accordance with the guidelines of this Transparency and Business Ethics Program, valuing their feedback as an opportunity to improve our services.

Relationship with Suppliers and Contractors

Our relationships with suppliers are ethical and lawful. Suppliers are selected based on quality, certification, and market experience, following practices aligned with current legislation and our continuous improvement goals.

To ensure suppliers operate in compliance with laws and standards, we promote awareness of this Program and expect strict adherence to all contractual agreements and commitments. We expect our employees and suppliers to act in accordance with these guidelines.

Relationship with the Community

Any employee representing the company in community interactions must act ethically and without favoritism. They must also respect cultural values and recognize the importance of communities to the company's public relations success.

Adoption of Internal Policies and Rules

This Program outlines the content and guidelines of the following policy:

Policy on Giving and Receiving Gifts or Benefits from Third Parties

As part of our commitment to transparency and business ethics, the company does not encourage the giving or receiving of gifts or benefits. However, if an employee receives a gift or benefit, it must not be considered personal and must be reported to their immediate supervisor, management, and the Compliance Officer.

It is strictly prohibited to offer or receive money or any benefit from contractors, suppliers, or clients (prospective, current, or potential) to secure or develop a business deal within the company. Likewise, no payments, gifts, or items—regardless of value—may be given to national or foreign public officials.

If a contractor proposes giving benefits in connection with a contract, it is prohibited to accept them. Any such agreement must be included in writing in the contractual conditions.

Corporate gifts given by Aceros Turia to clients, suppliers, or employees—defined jointly by management and human resources—are excluded from this prohibition. These may be given during Christmas or other special occasions, such as company anniversaries.

If an employee becomes aware that a colleague has received a gift or benefit, they must report it to their immediate supervisor, management, and the Compliance Officer.

Only the following gifts are permitted: commercial courtesies or souvenirs such as calendars, agendas, pens, or other small tokens of appreciation that do not influence business decisions. Any other gift must be authorized by management.

When giving or receiving a gift or benefit, employees must consider the following:

- The intent must be to strengthen a professional or commercial relationship, never to create a personal bond
- The gift or benefit must be offered and/or accepted in good faith.
- Giving or receiving a gift must be done openly and transparently.
- Gifts must be delivered at Aceros Turia offices, not at the recipient's home.
- Gifts must not obligate the company or its representatives to give or receive preferential treatment.
- Employees may not accept gifts or benefits from suppliers, clients, or third

parties, such as trips, cash, or goods.Gifts must not be frequently given to the same recipients.

- Interactions involving gifts or attendance at events with government officials (PEPs) are prohibited.
- Under no circumstances may employees request any kind of commission or fee from clients for properly performing their duties at Aceros Turia.

Policy on Employee and Contractor Compensation and Commission Payments

Compensation and Commission Payments to Contractors:

All negotiations involving an international business or transaction must be documented in writing and will be analyzed under the due diligence procedure as part of the controls established to minimize the risk of transnational bribery. This process will be carried out jointly by the requesting area, the contracting area, and the Compliance Officer.

If commissions are to be granted to a contractor in the context of a national or international business, these must be explicitly included in the contract to avoid covert payments disguised as commissions, a practice that is strictly prohibited.

Payments under these terms will be made through bank transfers and compensation accounts when applicable, and must be duly supported by invoices or payment requests issued according to the terms specified in the contract or purchase order, and deposited into the bank account registered by the contractor during the onboarding process.

Compensation and Commission Payments to Employees:

Compensation and commissions for employees are governed solely by the terms of the employment contract and any signed amendments.

Payments will be made by bank transfer to the account the employee registered during the onboarding process and later entered into the payroll system.

Any payment that does not comply with this policy is strictly prohibited.

Policy on Entertainment, Meals, Lodging, and Travel Expenses

The company may incur expenses related to entertainment, representation, meals, lodging, and travel exclusively to fulfill commercial needs. Therefore, no such expenses may benefit any national or foreign public official.

All travel must be requested in advance from the direct supervisor and/or management using the travel request and/or advance request form, sent via email. The request must include at minimum:

- Travel destination;
- Purpose of the trip;
- Departure and return dates and times;
- Means of transportation;
- Estimated budget.

Expenses such as lodging, meals, transportation, and representation must be supported by the original invoice or equivalent document using the expense reimbursement form, which must be submitted to the Treasury Department.

Management and/or the immediate supervisor will evaluate and approve the request if the trip is deemed necessary and justified. Employees who travel domestically or internationally and/or visit clients and suppliers must submit reports on the invitations made and/or received, justifying their purpose. These reports may be reviewed and audited at any time by the Compliance Officer.

Invitations made to clients by Aceros Turia must be authorized in advance by management and must serve relationship-building and loyalty purposes. Management will determine the list of invitees.

All invitations must be reported, and employees must clearly distinguish between invitations and representation expenses.

Policy on Political Contributions of Any Kind

"Political contributions" refers to the provision of money, items of pecuniary value, or other benefits to a political party, political candidate, or political campaign. Political contributions are generally prohibited. However, if Aceros Turia intends to make a contribution, it must be authorized without exception by the highest corporate body and immediately reported to the Compliance Officer.

If the contributions exceed 2% of the maximum allowable campaign expenditures, the company will be disqualified from entering into contracts with the State, pursuant to Article 2 of Law 1474 of 2011, and must conduct corresponding C/TB due diligence.

Donation Policy

All company donations must be authorized in advance by Management, who will verify and identify the beneficiary organization.

General guidelines:

- Cash donations are not permitted;
- Donations will be limited to surplus inventory, slow-moving stock, or damaged goods;
- If such inventory is not available, Management will decide whether to donate first-quality products;
- Donations will only be made to registered non-profit legal entities;
- Management will evaluate exceptional cases for non-tax-deductible donations;
- Donations must be recorded in the accounting books;
- Donations requested by shareholders must be paid by them personally.

All donations must be documented with a delivery report and verified by the Compliance Officer, who will confirm that the counterpart due diligence and onboarding procedures have been completed, and that the donation complies with this policy and all applicable tax requirements, which will be jointly validated by the Treasury and Accounting Departments.

Policy on Execution of Contracts, Procedures, and Bidding Processes with the State

All employees representing Aceros Turia before the State must comply with the policies outlined in this Manual, especially the prohibition against facilitation payments or offering money or valuables to public authorities or officials, whether to influence a decision or not.

Aceros Turia will strictly comply with the terms of executed contracts, subject to prior legal review to ensure that the Company can meet the contractual obligations, whether in public tenders or direct contracting. Execution will be documented through delivery minutes as agreed.

Contractual Policies for the Implementation of the Transparency and Business Ethics Program

Contractual clauses will be incorporated into agreements with third parties who pose a higher risk exposure, to prevent and discourage violations related to bribery and corruption.

To reinforce the importance of compliance, an acknowledgment and commitment agreement will be made available to employees, emphasizing their adherence to the TBEP and to transparent, ethical conduct within the company.

Whistleblower Protection Policy

All reports submitted to the ethics line will be reviewed by the Compliance Officer to ensure whistleblower anonymity and protection from retaliation. If the Compliance Officer finds that the report involves a member of management and/or the executive team, the matter must be submitted directly to the highest corporate body.

If a report comes from an employee who has been approached to engage in a C/TB-related act, the Compliance Officer may issue mandatory compliance recommendations, such as replacing the employee in the relationship with the third party, or any other measure deemed necessary to ensure their safety.

The following rights of whistleblowers will always be respected:

1. Anonymity;
2. Integrity;
3. Non-discrimination;
4. Non-retaliation;
5. Respectful treatment;
6. Right to a good name;
7. Freedom of opinion or expression.

Additionally, the company's internal policies on workplace harassment prevention will be strictly enforced.

Risk Measurement Procedure

Aceros Turia will apply the following risk measurement scales for Corruption and Transnational Bribery risks:

- **Frequency Scale:** Refers to the number of times a risk event may occur within a one-year period.

PROBABILITY/FREQUENCY SCALE			
Quantitative Value	**Frecuency**	**Description**	**Qualitative Value**

1	Rare	May occur only under exceptional circumstances	May occur up to 2 times per year
2	Unlikely	May occur between 3 to 7 times per year	May occur between 3 to times per year
3	Possible	Could occur at some point	May occur between 8 and 12 times per year
4	Likely	Likely to occur under most circumstances	May occur between 13 and 17 times per year
5	Casi Cierto	Expected to occur under most circumstances.	May occur more than 18 times per year

● **Impact Scale:** Refers to the effects or damages caused to the company. Quantitative and qualitative values have been established according to the risks associated with Corruption and Transnational Bribery, which determine the impact scale based on the following elements for each associated risk:

- **Legal Risk:** The regulatory framework governing business activities is increasingly broad and complex. The potential for non-compliance with this framework constitutes a high-risk source, making it the most sensitive among the risks associated with Corruption and Transnational Bribery due to the possible civil, administrative, and criminal consequences.
- **Reputational Risk:** In today's market, this is considered a critical factor for increasing corporate value and capitalization. The materialization of this risk destroys value and may lead to client loss or even the disappearance of Aceros Turia
- **Operational Risk:** Operational risk can result in the materialization of legal and reputational risks from a financial standpoint. It is a risk whose consequences are covered with capital and can be internally managed and controlled.
- **Contagion Risk:** This arises when initiating any relationship. It is a risk that may have indirect consequences for Aceros Turia, without the company's direct involvement. Therefore, the consequences do not necessarily impact the company directly.

IMPACT SCALE					
Quantitative Value	**Qualitative Value**	**Legal Risk Description**	**Contagion Risk Description**	**Operational Risk Description**	**Reputational Risk Description**
1	Insignificant	Request for Information By national authorities			

			involucradoPosibility of loss due to relationship with a non-relevant client involved in C/T operations	Possibility of being used for C/T operations due to deficiencies in people, processes, technology, or infrastructure affecting up to 5 legal minimum monthly wages (LMMW)	Concern limited to internal disagreements, which may lead to customer complaints but do not compromise the relationship
2	**Minor**	Inspection report from Superintendency of Companies with recommendations	Possibility of loss due to relationship with a supplier involved in C/T operations	Possibility of being used for C/T operations due to deficiencies in people, processes, technology, or infrastructure affecting between 5 and 50 LMMW	Negative mention disclosed locally, which may compromise the trust of one or a few non-representative clients
3	**Moderado**	Warning from Superintendency of Companies	Possibility of loss due to relationship with a key client or sole supplier of products or services involved in C/T operations	Possibility of being used for C/T operations due to deficiencies in people, processes, technology, or infrastructure affecting between 50 and 200 LMMW	Negative mention disclosed in national mass media and/or social networks, potentially causing loss of a group of clients
4	**Major**	Opening of formal charges by the Superintendency of Companies	Possibility of loss due to relationship with a partner/employee/executive or client with significant sales value involved in C/T operations	Possibility of being used for C/T operations due to deficiencies in people, processes, technology, or infrastructure	Negative mention disclosed in national mass media and/or social networks, potentially causing the loss of a client or group of clients

5	Catastrophic	**Economic blockade** or fines from national and international authorities exceeding 200 Legal Monthly Minimum Wages (LMMW).	Possibility of loss due to a relationship with a Shareholder or Legal Representative involved in C/T operations	Possibility of being used for C/T operations due to deficiencies in people, processes, technology, or infrastructure affecting more than 500 LMMW.	Negative mention disclosed in national and international mass media, which may result in the loss of a representative client or group of clients or the loss of the company's financial relationships

TOTAL IMPACT		
Quantitative Value	**Qualitative Value**	**Description**
1	**Insignificant**	Does not impact the strategy or objectives.
2	**Minor**	Generates a non-representative impact on the strategy and/or objectives.
3	**Moderate**	Affects the strategy and/or achievement of some important objectives.
4	**Major**	Significantly affects the strategy and objectives.
5	**Catastrophic**	Compromises the survival of Aceros Turia.

- **Severity Scale:** This is the result of multiplying the frequency rating by the weighted impact rating.

SEVERITY SCALE				
Severity Value Range		**Event Severity Rating**	**Quantitative Value**	**Severity Scale**
1	3	**Insignificant**	1	Risks that may occur up to 2 times per year, whose occurrence is not representative for the strategy and/or objectives.
4	8	**Moderate**	2	Risks that may occur between 3 to 12 times per year, whose occurrence affects the strategy and/or the achievement of some important objectives
9	15	**High**	3	Risks that may occur between 13 to 17 times per year, whose occurrence significantly affects the strategy and objectives.
16	25	**Very High**	4	Risks that may occur more than 18 times per year, whose occurrence compromises the survival of Aceros Turia.

The identified risks are plotted on a heat map, which allows visualization of which inherent risks are insignificant, minor, moderate, major, or catastrophic. Based on this, the risk or heat map of Aceros Turia is as follows:

I	HET MAP				
Catastrophic	5	10	15	20	25
Major	4	8	12	16	20
Moderate	3	6	9	12	15
Minor	2	4	6	8	10
Insignificicant	1	2	3	4	5
F	**Rare**	**Unlikely**	**Possible**	**Likely**	**Almost Certain**

VERY HIGH	HIGH	MODERATE	INSIGNIFICANT
16 a 25	10 a 15	4 a 9	1 a 3

According to the chart, the areas shaded in green and yellow correspond to low and moderate risk levels. Therefore, for the purposes of managing C/TB risk, inherent and residual risks classified within these levels will be subject to risk treatment measures aimed at mitigating their effects to the lowest possible degree.

Conversely, the areas shaded in orange and red correspond to high and extreme risk events, for which there is zero risk tolerance. In such cases, it is necessary to implement control measures to reduce the likelihood of occurrence and/or the impact should they materialize.

Control and Monitoring of Compliance Policies and the TBEP — Risk Control Procedure

Once inherent risk events have been identified and measured, controls are established to reduce both the likelihood of occurrence and the impact should the risk materialize. These controls aim to reflect a lower residual risk value and to ensure that such risks fall within the predefined levels of acceptance or tolerance.

At Aceros Turia, controls are classified as follows:

- **Preventive Controls:** Actions implemented to address the root causes of risks and their contributing factors, aiming to prevent or reduce the frequency of risk events and process deviations by setting the necessary conditions to avoid the occurrence of the risk before the process begins.

- **Detective Controls:** Actions implemented to identify deviations during the execution of a process. These controls detect anomalies or errors without preventing them. They function as alerts that log problems and their causes, typically after the event has occurred.
- **Corrective Controls:** These controls correct deviations, risks, errors, omissions, or deliberate acts and prevent their recurrence before they lead to significant losses. They are executed after a risk has occurred and aim to improve other controls if they are found to be ineffective or not functioning as originally intended.

  The risk control methodology involves reviewing existing controls, continuously improving them, and implementing new controls to reduce the probability and impact of identified risks.

  Controls must be assessed to determine their effectiveness and efficiency based on the following criteria:
- **Type of control:** Preventive, detective, or corrective.
- Once the risk matrix is evaluated, the effectiveness of each control will be determined, yielding a qualitative result categorized as: high effectiveness, moderate effectiveness, or low effectiveness.

Risk Monitoring and Review

This stage involves the continuous tracking of the Program to assess the effectiveness and efficiency of controls, ensuring they are comprehensive and applicable to each identified risk, as follows:

Monitoring Procedure

According to ISO 31000 Risk Management Standard, it is essential to monitor risks, the effectiveness of risk treatment plans, strategies, and the management system established for implementation. Some of the key procedures include:

Supervision by the Compliance Officer regarding C/TB risk management in legal relationships with government entities or in national and international business or transactions involving the company. For this purpose, administrators must implement mechanisms enabling the Compliance Officer to verify the effectiveness of procedures aimed at preventing any act of corruption.

- Periodic performance of Compliance Audits and Due Diligence procedures, as determined by the Compliance Officer.
- Conducting surveys among employees and contractors to assess the effectiveness of the TBEP.
- Risks and the effectiveness of control measures must be monitored to ensure that any changes in circumstances do not alter the risk priorities.

The Monitoring Phase Aims to:

- Develop an effective tracking process that facilitates the early detection and correction of deficiencies in the TBEP; this monitoring must occur at least annually.
- Ensure that controls cover all risks and are functioning in a timely, effective, and efficient manner.
- Ensure that residual risks remain within the acceptance levels established by Aceros Turia.
- Validate that the risk treatment action plans being executed align with those originally defined, verify that deliverables and deadlines are being met, and enable management to take action in cases of non-compliance with the established plan.

This phase also helps identify changes in the internal and external context that may impact the achievement of objectives. Additionally, it allows the company to draw lessons from actual or near-miss events, leading to necessary adjustments in Aceros Turia's policies, processes, and controls.

Risk Matrix

All the stages mentioned above will be documented in accordance with the company's C/TB Risk Matrix, which must include the development of the topics established in this Program.

The risk matrix will be updated in response to the introduction of new businesses, products, channels, and jurisdictions of operation, at least once a year.

Assignment of Duties and Responsibilities

As a company, we are obligated to implement the necessary measures to comply with legal obligations related to Transparency and Business Ethics, which must be aligned with the company's principles and values.

Shareholders' Assembly

It is responsible for establishing and defining the Compliance Policies, including the instructions to be issued regarding the design, structuring, implementation, execution, and verification of actions aimed at the effective prevention and mitigation of any corrupt practices.

Duties and Responsibilities:

- Issue and define the Compliance Policy;
- Define the profile of the Compliance Officer in accordance with the Compliance Policy;
- Appoint the Compliance Officer;
- Approve the document that includes the TBEP;
- Commit to the prevention of C/TB risks to enable the company to conduct its business ethically, transparently, and honestly;
- Ensure the provision of financial, human, and technological resources needed by the Compliance Officer to fulfill their role;
- Order appropriate actions against Associates with managerial or administrative functions, Employees, and administrators when any of them violate the TBEP;
- Lead a communication and training strategy to ensure effective dissemination and understanding of the Compliance Policies and the TBEP among Employees, Associates, Contractors, and other identified stakeholders;
- Review the reports submitted by the Compliance Officer and record them in the respective meeting minutes.

General Manager and/or Legal Representative

Duties and Responsibilities:

- Present, together with the Compliance Officer, the TBEP proposal to the highest corporate body for approval;
- Ensure that the TBEP aligns with the Compliance Policies adopted by the highest corporate body;
- Provide effective, efficient, and timely support to the Compliance Officer in the design, management, supervision, and monitoring of the TBEP;
- In the absence of a Board of Directors and/or highest corporate body, the Legal Representative shall propose a candidate for Compliance Officer to be appointed by the highest corporate body;
- Certify compliance with External Circular 100-000011 of August 9, 2021, or any subsequent regulation, before the Superintendency of Companies, when required;
- Ensure all activities arising from the implementation of the TBEP are properly documented to meet criteria of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality. Documentation must be retained as stipulated in Article 28 of Law 962 of 2005 or any subsequent regulation.

Compliance Officer

The person appointed by the highest corporate body to lead the Transparency and Business Ethics Program.

Appointment and Designation of the Compliance Officer

The highest corporate body must appoint the Compliance Officer and report this appointment in writing to the Superintendency of Companies (Delegation for Economic and Corporate Affairs) within fifteen (15) business days of the designation.

The company must keep the Compliance Officer's information up to date and notify the Superintendency in writing of any changes within fifteen (15) business days.

Aceros Turia must define, in accordance with its Compliance Policy:

- The profile (requirements) for the Compliance Officer;
- Incompatibilities and disqualifications;
- Conflict of interest management;
- Specific responsibilities in addition to those outlined in the Circular.

Minimum Requirements to be Appointed as Compliance Officer

The appointed natural person must meet at least the following requirements:

- Be empowered to make decisions to manage C/TB risk and report directly to the highest corporate body;
- Have sufficient knowledge of C/TB risk management and understand the company's core operations;
- Be supported by a suitable technical and human team based on the company's size and risk exposure;
- Not belong to management, social bodies, or the statutory auditor's office (e.g., serve as statutory auditor or be part of the firm performing that role);
- If not employed by the company, the person may be affiliated or unaffiliated with a legal entity;
- Not serve as Compliance Officer for more than ten (10) companies. If serving more than one, the Compliance Officer must certify, and the appointing body must verify, that there are no conflicts due to competitive relationships;
- If part of a corporate group or control structure, the same Compliance Officer may serve all companies in the group, regardless of number;
- Be domiciled in Colombia;
- Hold a professional degree;
- Possess suitable experience in risk management;
- Not be subject to disqualification or incompatibility for the role.

Incompatibilities:

- Being part of the company's management, commercial, statutory audit, or internal audit areas.

Disqualifications:

- Owning shares in core clients or suppliers that create conflicts of interest and prevent impartial oversight;
- Being related by blood up to the second degree or by affinity up to the first degree with members of the highest corporate body or management.

Duties and Responsibilities:

- Present, with the Legal Representative, the TBEP proposal to the highest corporate body for approval;
- Submit reports at least annually to the highest corporate body, including evaluations of TBEP effectiveness and suggested improvements;
- Ensure TBEP aligns with the Compliance Policies adopted by the highest corporate body;
- Ensure effective, efficient, and timely execution of the TBEP;
- Implement and update the Risk Matrix according to company needs and C/TB risk materiality;
- Define, adopt, and monitor actions and tools to detect C/TB risk in accordance with the Compliance Policy and Risk Matrix;
- Ensure proper implementation of secure and confidential reporting channels for TBEP violations and suspected corruption activities;
- Verify enforcement of the company's whistleblower protection policy and workplace harassment prevention policy;
- Establish internal investigation procedures to detect TBEP breaches and corruption acts;
- Coordinate internal training programs;
- Verify compliance with the company's Due Diligence procedures;
- Oversee proper documentation and archiving of information related to C/TB risk management and prevention;
- Design classification, identification, measurement, and control methodologies for C/TB risk as part of the TBEP;
- Evaluate compliance with the TBEP and the company's exposure to C/TB risk.

Considerations Regarding an Alternate Compliance Officer

Although not legally required, Aceros Turia has determined that, in the event of temporary absence of the primary Compliance Officer, the service provider company will assign another member of its team to fulfill the role.

Statutory Auditor

The statutory auditor must report any acts of corruption discovered during the course of their duties to the appropriate authorities. Article 32 of Law 1778 of 2016, which adds to Article 26 of Law 43 of 1990, mandates this obligation regardless of professional secrecy:

"*Statutory auditors must report to criminal, disciplinary, and administrative authorities any acts of corruption or suspected crimes against public administration, the economic order, or public property detected in the exercise of their duties. They must also inform the company's social bodies and management. Reports must be made within six (6) months of becoming aware of the facts. Professional secrecy does not apply in these cases.*"

In fulfilling this duty, the statutory auditor must pay special attention to red flags that may suggest possible corruption.

Given the distinct responsibilities of the statutory auditor, the Legal Representative, and the Compliance Officer, the statutory auditor or Legal Representative must not serve as the Compliance Officer.

Employees

Duties and Responsibilities:

In addition to any roles defined in other internal documents or manuals, employees have the following responsibilities under the Transparency and Business Ethics Program:

- Report any unusual or suspicious operations identified during their work to the Compliance Officer;
- Provide required information to the Compliance Officer in a timely manner to facilitate periodic reporting of unusual operations;
- Promote a culture of ethics and C/TB risk management;
- Identify potential C/TB risk situations, behaviors, or documents in relationships with suppliers, clients, employees, shareholders, board members, and other counterparts;
- Report to the Compliance Officer any unusual behavior or situations encountered in their duties or processes;
- Attend training sessions and other activities included in the Training Plan;
- Perform their duties with a risk management focus, prioritizing compliance with laws, ethics, principles, and corporate values over commercial goals;
- Comply with the guidelines and procedures set forth in the Program.

Human Resources Management
Functions and Responsibilities:

- Manage the processes of selection and hiring of the company's personnel;

- Comply with internal procedures for staff selection and hiring, particularly regarding employee background checks;
- Carry out disciplinary procedures for actions or omissions by employees that violate company policies;
- Refrain from hiring any new employee with a criminal record related to Corruption or Transnational Bribery;
- In cases where an employee is found to have committed a C/TB offense, a prior analysis of the situation will be conducted with the participation of the Human Resources department, the Compliance Officer, and the General Manager to determine whether to initiate a disciplinary process, which, following due process, may result in termination of the employment contract for just cause;
- Strictly comply with the internal work regulations and special provisions set out in individual employment contracts and job manuals;
- Enforce disciplinary processes for employees who, by omission or failure, breach company policies or procedures related to PTEE controls;
- Include in the internal work regulations the obligations related to the nature of the entrusted work, the contract, legal provisions, internal regulations, and various company statutes, manuals, circulars, or instructions, including compliance with this manual.

Adoption of Controls for the Risk of Transnational Bribery and Corruption

Due Diligence Procedure

This process is intended to provide the necessary elements to identify and assess the risks of corruption and transnational bribery to which the company may be exposed through relationships with individuals or legal entities, whether commercial, contractual, labor-related, or otherwise.

Due diligence will consider factors such as the nature of the contracts, the amount of compensation, the contractors involved, and the countries where activities, negotiations, or transactions take place. Its purpose is to prevent and avoid the use of the company as a means to execute or conceal direct or indirect bribes or gifts to national or foreign public officials in the context of a contractual or legal relationship with a public entity.

This procedure must be carried out at the beginning of every negotiation or relationship with third parties. It involves reviewing legal, accounting, financial, and reputational aspects, including verification of good credit standing and reputation.

To this end, the third party must complete the onboarding form, which provides access to information that enables reputational and background checks, as well as dissemination of the company's PTEE and its commitment to good practices.

Next, the provided documentation will be verified, and the third party will be screened using a search engine that checks restrictive lists, open data sources, reputational news, PEPs, and legal proceedings, among others.

Due diligence will be conducted by the personnel responsible for third-party onboarding or the Compliance Officer, who will be provided with the necessary training, knowledge, and human and technological resources to collect background information on commercial, reputational, and administrative, criminal, or disciplinary sanctions that may have affected or may affect the subjects under review, ensuring the proper execution of the process.

Due diligence activities must be easily accessible and understandable to the responsible employees and the Compliance Officer. All documentation must be kept in the respective third-party file, including records of negotiations or contracts and search results obtained using the company's search engine.

If any payment must be made to contractors or public officials, the Compliance Officer, with support from the Treasury or Accounting department, will supervise the transaction to avoid hidden payments, bribery, or gifts.

Monitoring and Oversight of Compliance Policies and the Business Transparency and Ethics Program (PTEE)

The oversight of the PTEE allows for monitoring the effectiveness of procedures aimed at preventing corrupt practices and transnational bribery. It evaluates the effectiveness of controls and residual exposure levels through audits (which must be properly documented), employee reports, and annual surveys conducted with employees and contractors to verify the program's effectiveness.

This stage allows for the identification of any PTEE non-compliance, thus enabling updates to the program at least once every two years or whenever risk assessments and controls reveal circumstances that warrant changes.

Conflicts of Interest

Conflicts of interest arise when one or more individuals and/or entities or business units have interests that may conflict with those of another party, or when there is a duty of care or trust with third parties with an interest in the company. It may also arise when a situation adversely affects a person's ability to fulfill their assigned duties at Aceros Turia.

Therefore, when administrators or employees face a conflict of interest or must make a decision or act/omit an action where they must choose between the company's interest and a personal or third-party interest—thereby compromising their objectivity or independence—they must act according to the principles of loyalty, abstention, confidentiality, and the duty to disclose.

Each member of Aceros Turia must perform their duties impartially and avoid any conduct involving preferential or discriminatory treatment, misrepresentation of facts, or actions that result in personal gain (direct or indirect).

In any of the situations above, the individual must immediately and fully report the issue to the company through the Ethics Committee, avoiding any favoritism towards personal or third-party interests (whether related or not), regardless of whether the company benefits.

If a director or employee identifies a conflict of interest involving the Compliance Officer, it must be escalated to the company's Highest Corporate Body, which will resolve the issue and take necessary actions.

To avoid conflicts of interest, employees must act with honesty, ethics, and loyalty. Therefore, the following actions are prohibited:

- Engaging in any external activity that interferes with their responsibilities at the company, especially if it involves suppliers, clients, or coworkers;
- Allowing personal relationships with former or current employees to influence organizational decisions;
- Offering unauthorized benefits to third parties or subordinates by taking advantage of their position;
- Using their position in the company to obtain personal benefits, including for family members or third parties;
- Performing personal activities that use company time or resources or that compete with Aceros Turia's business;
- Engaging in romantic relationships within the company without informing management;
- Granting preferential treatment or work conditions based on personal or family relationships;
- Hiring individuals who currently hold or have held public office must strictly comply with applicable laws and any additional internal restrictions to prevent conflicts with those who have been involved in matters directly affecting the company's interests.

Reporting Mechanisms

At Aceros Turia, transparency and ethics are fundamental pillars of our corporate culture. We promote open and honest communication, where all employees and third parties are encouraged to report any irregularities they observe.

All employees have a duty and responsibility to report any suspected or known violation of laws, regulations, values, or PTEE standards, as well as any misconduct or breach of corporate policies.

We expect all our third parties to genuinely commit to reporting, via the Ethics Line email or directly to the Compliance Officer, any act or irregularity that violates the PTEE or current legislation and may harm the company's interests.

Ethics Line

This is a confidential channel made available by the company to report conduct contrary to the PTEE. All necessary safeguards are in place to ensure the protection and confidentiality of the reporting person,with absolute confidentiality guaranteed.

Email: lineadeetica@acero-turia.com

Reporting Transnational Bribery to the Superintendence of Companies

The company promotes the use of the reporting channel for transnational bribery available through the Superintendence of Companies at the following link:

https://www.supersociedades.gov.co/web/asuntos-economicos-societarios/denuncias-soborno-transnacional

Reporting Corruption to the Superintendence of Companies

The company promotes the use of the reporting channel for acts of corruption provided by the Superintendence of Companies, available at:

https://www.supersociedades.gov.co/es/web/guest/denuncias-por-corrupcion

Reporting Acts of Corruption to the Secretariat of Transparency (Colombia's Anti-Corruption Portal – PACO)

The company also promotes the use of the reporting channel for corruption available through the Secretariat of Transparency, at:

https://portal.paco.gov.co/index.php?pagina=denuncie

Red Flags

Red flags related to C/TB Risk can be categorized into groups, depending on connections, negotiation processes, third-party due diligence, among others. Some of the red flags identified by the company include:

● In the analysis of accounting records, operations, or financial statements:

- Invoices that appear to be false or do not reflect the reality of a transaction, or that are inflated and contain excessive discounts or reimbursements.
- Foreign operations with highly sophisticated contractual terms.
- Transactions that lack logical, economic, or practical explanation.
- Transactions outside the ordinary course of business.
- Transactions in which the identity of the parties or the origin of the funds is unclear.
- Assets or rights recorded in the financial statements that have no real value or do not exist.

● In the corporate structure or business purpose:

- Legal entities with structures involving domestic trusts or foreign trusts, or non-profit foundations.
- Legal entities with offshore structures or offshore bank accounts.
- Companies identified by the DIAN as fictitious suppliers.
- Legal entities for which the Final Beneficiary cannot be identified.

● In the analysis of transactions or contracts:

- Frequent use of consulting contracts, intermediaries, or joint ventures.
- Contracts with contractors or state entities that appear legal but lack clearly defined obligations and responsibilities.
- Contracts with contractors that provide services to a single client.
- Unusual losses or gains in contracts with contractors or state entities, or significant changes without commercial justification.
- Contracts with unreasonable variable compensation or involving cash payments.
- Payments to PEPs (Politically Exposed Persons) or individuals closely associated with PEPs.
- Payments to related parties (Partners, Employees, Subsidiaries, Branches, among others) without apparent justification.

Sanctions Regime

Non-compliance with this Manual by senior management, partners, or any member of the company will be evaluated and assessed jointly by the General Manager, Human Resources, and the Compliance Officer. It may be considered a serious offense leading to the sanctions established in employment contracts and/or in the Internal Work Regulations (IWR). Accordingly, proven non-compliance may result in termination of the contract with just cause and without severance pay, following the internal disciplinary procedure.

This disciplinary mechanism will be triggered if any member of senior management, collaborators, or company members:

- Engages in behavior contrary to this Business Transparency and Ethics Program and/or national anti-corruption laws or any amendments or related regulations;
- Is aware of behavior contrary to the Program or national anti-corruption laws, and ignores, tolerates, or consents to such behavior and/or fails to report it in a timely manner;
- Fails to comply with responsibilities according to the Business Transparency and Ethics Program or misuses privileged information.

It is vitally important to comply with the provisions of this Program, as non-compliance may result in legal actions (criminal, administrative, etc.) against the company and may extend to owners, administrators, or employees through sanctions, fines, inclusion on watchlists or databases of authorities or oversight bodies, or criminal measures.

Document Filing and Retention Procedures for International Business or Transactions

Documents related to national or international business or transactions must be archived, safeguarded, and retained in accordance with the technical, human, and administrative measures adopted by the company. These measures must ensure the security of the records, preventing alteration, loss, unauthorized or fraudulent access or use. The records must be preserved for a period of 10 years from the date of creation, either in digital or physical formats, depending on availability and the document management model defined by the company, in compliance with Article 28 of Law 962 of 2005.

Disclosure and Training

The company will disclose the Business Transparency and Ethics Program to its shareholders, members of the highest corporate body, executives, employees, contractors, and strategic partners through the communication channels established.

Disclosure of the Business Transparency and Ethics Program may take place through publication on the intranet, email, the company's website, and/or bulletin boards at company facilities, ensuring access and awareness across all stakeholders.

Training for employees on this subject shall be conducted through digital platforms and/or in-person sessions, starting with the onboarding and reorientation processes.

Additionally, the Compliance Officer will conduct training sessions for all employees and stakeholders whenever deemed necessary, and at a minimum once (01) per year.