

OBJECTIVE

Identify, detect, prevent, manage and mitigate Corruption Risks or Transnational Bribery Risks that may affect GECOLSA, in accordance with the Risk Matrix. Also correct situations that may become these practices.

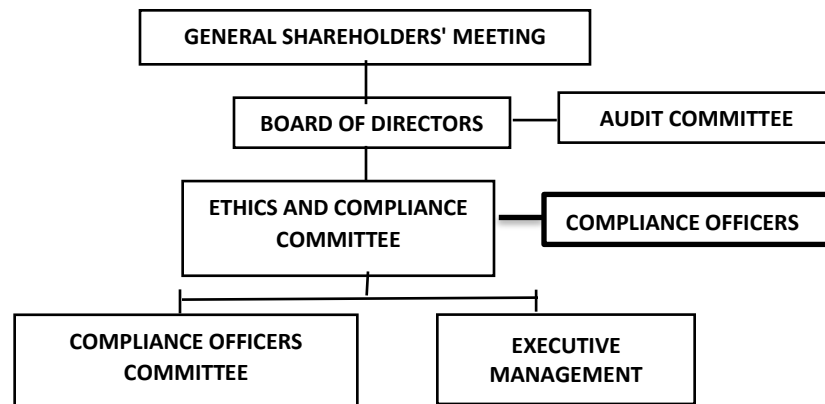
SCOPE

We are convinced of the importance that the business ethics has for the private organizations and for the country, and we have always acted this way through our actions and our people.

Therefore, since 2017, we implemented a robust Business Ethics Program, which has been strengthened and enriched over time and with the experience of our teams.

Through this program, the course of actions of the corporate governance bodies were defined and the Corporate Governance codes, regulations and manuals that regulate the relationships between Shareholders, The Board of Directors, Senior Management, and other stakeholders, around the company's Transparency and Business Ethics Program, were approved, namely:

1. CORPORATE GOVERNANCE BODIES FOR THE IMPLEMENTATION OF THE TBEP.



General Assembly of Shareholders. This is the highest governing body of the Company in charge of directing the Company's general policy, reforming the Company's Bylaws, and electing and removing the members of the Board of Directors. It is the body that approves the Company's Code of Ethics and Conduct.

Board of Directors. This is the Company's collegiate management body, in charge of the strategic definition and the follow-up process of the fulfillment of the organization's goals and the approval of operations that generate a potential conflict of interest. It is the approving body of the Conflict of Interest and Privileged Information Management Codes, SAGRILAF Manual, TBEP Manual, Protection of Personal Data and other documents that make up the Transparency and Business Ethics Program of the organization.

Audit Committee. This body, made up by members of the Board of Directors, is responsible for evaluating the accounting procedures, the relationship with the Statutory Auditor and, in general, the review of the Company's Control Structure, including the audit of the risk management system implemented by the company. Among its functions is to audit the company's Business Ethics and Transparency system.

Ethics and Compliance Committee. This body, made up by members of the Board of Directors, is responsible for structuring and overseeing compliance with the programs through which our shareholders, customers, suppliers, and employees must know, adopt and report any behavior that goes against the company's principles on Ethics and Conduct.

It is currently composed of the following members:

- Member of the Board of Directors
- The President of the Company
- Chief Compliance Officer
- Alternate Compliance Officer

Principal and alternate compliance officers. These are the officers appointed by the Board of Directors for the implementation of the Code of Ethics within the organization, for the creation of an ethics hotline that allows the reporting of situations against the Code and to ensure the due process of the investigations carried out.

Ethics Hotline: This is a particular channel for any employee, customer, supplier, advisor or third party to use to file a complaint, anonymously if he/she considers it appropriate, and to receive due attention within the organization. The channels currently provided by the organization are as follows and are being managed by an independent third party to ensure anonymity and transparency in the management of cases.

- Phone lines: 018000919920 **opción 6** con atención en días hábiles de 8 AM a 6 PM.
- E-mail: etica_cumplimiento@gecolsa.com.co
- Web form, available on the web page: <https://gecolsa.com/formulario-de-recepcion-de-solicitudes-y-denuncias-de-la-linea-de-etica/>

Compliance Officers Committee. This body, made up by the main and alternate Compliance Officers of each of the companies of the Business Group, is responsible for ensuring compliance and updating of the Code of Ethics and Conduct, the Ethics and Compliance Programs, the Self-Control and Integral Risk Management System for Money Laundering, Financing of Terrorism and Financing for the Proliferation of Means of Mass Destruction (SAGRILAF), in accordance with the provisions of the regulations in force.

Executive Management. Its function is to promulgate and disseminate to all levels of the organization, including employees and other stakeholders of the company, all guidelines issued by the Corporate Governance Bodies.

2. CORPORATE GOVERNANCE DOCUMENTS FOR THE IMPLEMENTATION OF THE TBEP.

The Code of Ethics and Conduct is the backbone of the Transparency and Business Ethics Program and contains the principles and values on which the organization is based for the development of its corporate purpose. It was approved in its Spanish and English version by the organization in a decision of the General Assembly of Shareholders in March 2017; its principles are developed by Manuals or Policies approved by the corresponding instances within the organization and contains the topics as follows:

- Universal Human Rights.
- Compliance with laws, rules, and regulations.
- Conflicts of Interest.
- Handling of Privileged Information.
- Money Laundering and Financing of Terrorism.
- Personal Data Protection.
- Fraud and Asset Protection.

- Bribery and Corruption.
- Antitrust.
- Coexistence and Labor Harassment.

The company also has the following codes, regulations, and manuals in which the scope, functions and responsibilities of each of the Corporate Governance Bodies are structured around the Business Ethics Transparency Program (**BETP**).

Documento	Fecha de aprobación	Instancia
Business Ethics Program	Approved through Minute No. 123 on March 3	General Shareholders' Meeting
Code of Ethics and Conduct	Approved through Minute No. 123 on March 3	General Shareholders' Meeting
	Modified through Minute No. 127 on March 2	General Shareholders' Meeting
	Modified through Minute No. 826 on July 21,	Board of Directors
	Updated through Minute No. 842 on May 5, 2	Board of Directors
Manual of Procedure for the implementation of the Code of Ethics and Conduct.	Approved through Minute No. 732 on July 12	Board of Directors
Conflict of Interest and Insider Trading (CIT)	Approved through Minute No. 731 on May 23	Board of Directors
	Approved through Minute No. 125 on August 2017.	General Shareholders' Meeting
	Approved through Minute No. 127 on March 2	General Shareholders' Meeting
Corporate Governance Code	Approved through Minute No. 731 on May 23	Board of Directors
Internal Regulations of the Shareholders' Meeting	Approved through Minute No. 123 on March 3	General Shareholders' Meeting
Internal Regulations of the Board of Directors	Approved through Minute No. 731 on May 23	Board of Directors
Manual of the Self-Control System and Risk Management of Money Laundering, Financing of Terrorism, Financing of Proliferation of Weapons of Mass Destruction (SAGRILAFT)	Manual Approval of the Procedure of the Self-Control of the Risk of Money Laundering, Financing of Terrorism (SARLAFT) through Resolution No. 665 dated December 17, 2014.	Board of Directors
	Updated SAGRILAFT Manual through Minute No. 842 on July 23, 2019.	Board of Directors
	Updated SAGRILAFT Manual through Minute No. 867 on April 22, 2021.	Board of Directors
	Appointment of the Chief Compliance Officer and Alternate Compliance Officer through Minute No. 842 on February 15, 2022.	Board of Directors
	Updated through Minute No. 842 on May 5, 2022.	Board of Directors
	Updated through Minute No. 867 on May 10, 2022.	Board of Directors
Programa de Transparencia y Ética Empresarial y Manual de Corrupción y Transnacional.	Approved through Minute No. 842 on May 5, 2022. Likewise, the Principal Compliance Officer and Alternate Compliance Officer were appointed.	Board of Directors
	Updated through Minute No. 867 on May 10, 2022.	Board of Directors
Personal Data Processing Policy.	Approved through Minute No. 731 on May 23	Board of Directors
Manual for Value Building Supported Management	Approved on February 15, 2022.	Approved Internal Control and Risk Management
Gifts and Courtesy Policy	Approved on July 11, 2019.	Approved Human Talent Management

3. NEW APPROVALS

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Therefore, since 2017, we implemented a robust Business Ethics Program, which has been strengthened and enriched over time and with the experience of our teams.

At this meeting, the following documents are submitted to the Board of Directors for approval, which together with those already approved, make up an important part of the structure of the company's Transparency and Business Ethics Program:

- Transparency and Business Ethics Program and Manual on Corruption and Transnational Bribery.
- Corruption and Transnational Bribery Risk Map.
- Work schedule proposed by the Compliance Officer.

4. DOCUMENTS RELATED

MR-RI-MA-04 Transnational Bribery and Corruption

5. TRACK CHANGES

Version	Date	Change Description
1	05/05/2022	Creation of the document
2	05/06/2024	Update of the ethics line channels and minutes with the new update approvals.

Author	Reviewed by	Approved by
Angie Katherine Salazar Ospina Alternate Compliance Officer	Ligia Elvira Martínez González Compliance Officer	Kristin Fenton President