

INTRODUCTION

Through this document, the compliance policies are disclosed to the clients and contractors of POSSE HERRERA RUIZ S.A.S (hereinafter PHR), along with the relevant aspects of the Firm's Transparency and Business Ethics Program ("PTEE") , which has been implemented in compliance with the provisions of External Circular Letter No. 100-000011 of 2021 of the Superintendence of Companies.

ANTICORRUPTION COMPLIANCE POLICIES

PHR has adopted and internally disclosed its Conduct and Professional Ethics Code, which sets out the firm's main Anticorruption Compliance Policies.

- The operating principles.

PHR and its Employees are committed to acting honestly in the conduct of their business, complying with the law and exercising the professional activity in accordance with the highest ethical standards.

PHR and its Employees will not take undue advantage of the privileged information they access during their work.

PHR and its Employees will not use undue influence on other people in order to favor themselves or a third party in any objective selection process.

PHR and its Employees will refrain from participating in activities that pose a conflicts of interest for the firm or for themselves.

- Behavioral guidelines to follow in the relationships with customers.

PHR and its Employees will not assist or support their clients in the execution of any illegal or inappropriate procedure that goes against the law or PHR's principles, values, and Compliance Policies.

- Behavioral guidelines to follow in the relationships with suppliers.

PHR and its Employees will conduct negotiations with their suppliers in an honest and transparent manner.

Decisions regarding the hiring of suppliers are based on objective criteria including quality, price, technical specifications, payment conditions, delivery times, guarantees and other relevant criteria depending on the situation.

- Managing conflicts of interest.

Whenever a conflict of interest situation exists, the Employee must refrain from participating in the activity and must raise the conflict situation by informing his or her immediate superior.

- Conservation of documents and files.

PHR and its Employees will maintain and preserve the documents according to the laws in force. All Employees must properly understand the process of preserving, classifying and filing records and documents.

It is expressly prohibited to destroy, hide or alter documents or files for illegal or unethical purposes.

- SAGRILAFI

In a supplementary manner, its System for the Comprehensive Administration and Management of the Risks of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction – SAGRILAFI also is an integral part of PHR's Compliance Policies.

BUSINESS TRANSPARENCY AND ETHICS PROGRAM

Gifts

Neither PHR **nor** its Employees will accept or receive, directly or indirectly, gifts, courtesies, donations, invitations, favors or compensation of any kind that have the objective of inappropriately influencing the business and/or professional relationships of the firm, as well as the internal decision-making process.

Neither PHR **nor** its Employees shall promise, offer or deliver, directly or indirectly, gifts, presents, donations, invitations, favors, compensation or facilitation payments to a client, Contractor, Public Servant, Foreign Public Servant or to any other person, to obtain a benefit in favor of the firm, in favor of clients, in favor of any third party, or for personal benefit or for the benefit of family members or clients, acquaintances or of any third party.

Neither PHR **nor** its Employees shall request, directly or indirectly, under any circumstances whatsoever, gifts, presents, donations, invitations, favors, compensations or facilitation payments from any client, Contractor, Public Servant, Foreign Public Servant or from any other person.

Without prejudice to the foregoing, Employees may receive or make gifts of a promotional nature, courtesy details or ordinary attention within the course of the firm's business, as long as they do not affect or influence the autonomous and objective decision of PHR, of its Employees or third parties. For these purposes, Employees must inform their direct supervisor of any receipt or delivery of any courtesy detail whose value exceeds one quarter (1/4) of a current legal monthly minimum wage, so that the direct supervisor informs the Compliance Committee, and the relevant authorization or denial process is carried out in conjunction with the Compliance Officer.

The Employees, abiding by PHR's principles of honest and ethical action, must analyze each of the situations in which clients or Contractors intend to give them gifts, invitations, or hospitality in order to determine whether such acts are intended to inappropriately influence them in the commercial and/or professional relationships of the firm, as well as in the internal decision-making process. If this is the case, Employees must reject such gifts or hospitality in a respectful but firm manner. The Employee will inform his / her direct supervisor of any offer of a gift made by a Contractor, client or any third party that is intended to inappropriately influence the commercial and/or professional relationships of the firm. The direct supervisor will immediately inform the Compliance Committee of said situation, in order to make the respective decisions together with the Compliance Officer.

It will be understood that the value of a gift or attention is cumulative with any other gift or attention given or received from or for the same Contractor, client or any third party during the course of a calendar year.

Under no circumstances will PHR or its employees receive or make facilitation payments.

Remunerations and payment of commissions to Employees and Contractors

PHR will remunerate the work done by the firm's Employees according to the terms of their respective employment contracts and the labor legislation.

PHR will not give additional commissions or remunerations of any kind to its Contractors, apart from the payment due for the provision of their services or the supply of goods, in accordance with the stipulations of the respective contracts.

All payments that PHR makes to Employees or Contractors will be made through the proper banking channels, in which it is possible to determine the traceability of all movements.

All payments for products and/or services abroad must comply with the Colombian foreign exchange regime and be channeled through banking entities duly authorized by the Financial Superintendancy of Colombia or through compensation accounts duly registered with the Bank of the Republic.

All payments made to the Contractors must be supported on the amounts agreed in the contracts and/or in the purchase orders and may be audited by PHR or by a specialized third party that confirms the legality of the payments, the non-diversion of resources, and the non-concealment of

payments to third parties through the Contractor, or of payments to Contractors without adequate contractual justification.

No PHR Employee may make payments in breach of the PTEE or the firm's internal policies.

Entertainment, food, accommodation, and travel expenses

PHR has adopted a Corporate Travel Policy which sets out the guidelines and procedures that PHR Employees will follow in relation to the process of requesting, booking and purchasing tickets, accommodation, food and other needs incurred in corporate travel for the furtherance of business activities, such as business development, attendance at union events, attendance at networking events, conferences or training, visits to clients or potential clients, employee training, among other things.

Said Corporate Travel Policy is an integral part of the PTEE.

The Employees cannot make, under any circumstances, unauthorized or additional expenses that do not have due justification in accordance with the principles, standards and values set forth in the PTEE and the Conduct and Professional Ethics Code; Likewise, Employees will not allocate the resources provided by PHR for these purposes to purposes other than those authorized, or, in general, they cannot divert the purpose of the funds for their own benefit or for that of a third party.

All expenses incurred must be supported by the respective invoices or equivalent instruments. The internal delivery of cash to Employees must be recorded in writing.

Due to the accidental nature of all corporate expenses and trips that Employees may incur, and due to the fact that these are paid or reimbursed by PHR for the discharging of the Employees' duties, PHR declares that said expenses shall not be salary for any legal purposes, that they will not be deemed as salary per diem according to the relevant labor standards, and that will not be the basis for the calculation of mandatory contributions to the Integral Social Security System according to the provisions of article 30 of Law 1393 of 2010, as amended or supplemented from time to time.

Political Contributions

PHR neither belongs to nor has any type of affiliation with political parties, political organizations, political, social or union movements. In this sense, PHR clearly states that it fully respects the political affiliations of its Employees or Contractors, who are free to affiliate or not to any of the political parties, organizations or movements whose values are identified with theirs. However, Employees should not subject their professional and ethical duties to any type of political ideology to which they adhere.

PHR declares that it will not make any type of political contribution on an institutional basis to any campaign, party, movement or political, social or union organization. Contributions or participation of a political nature made by PHR Employees are permitted by PHR, as long as they do not involve the opinion or image of PHR.

Donations and sponsorships

PHR may make donations or agree to institutional sponsorships, or carry out activities in favor of those causes that it considers have a social or community benefit, such as non-profit entities or foundations with philanthropic purposes, solidarity or support for communities in situation of vulnerability.

Likewise, PHR has adopted a Probono Manual which compiles the relevant principles, rules, standards and procedures that must be followed within PHR to provide probono legal work to certain social sectors that, due to their socioeconomic conditions, do not have access to legal services and quality legal advice.

PHR Employees may make donations of a social nature in accordance with their philanthropic convictions as long as such acts do not compromise or involve the name of PHR.

Under no circumstances the donations or sponsorships can be used as a way to deliver undue benefits.

COMPLAINT CHANNEL

PHR Complaint Channel

PHR takes alleged violations of the PTEE, the Conduct and Professional Ethics Code or the Compliance Policies very seriously.

Therefore, PHR has established an anonymous reporting channel in which Employees, Associates or Contractors may confidentially report alleged facts, actions or omissions that breach PHR's principles and values in the fight against corruption.

Complaints filed in the Complaint Channel may be confidential; however, it is important to underscore that complaints that identify the complainant can be processed more efficiently when carrying out the relevant internal investigations.

In any case, PHR expressly states its commitment not to retaliate or retaliate for complaints that are filed in good faith.

The processing of the complaint will imply its confidentiality, the confidentiality of the identity of the complainant and of the accused and the confidentiality of the procedures ordered to elucidate the facts.

The Complaint Channel provided by PHR for its Clients and Contractors is the following:

comitecumplimiento@phrlegal.com

SANCTIONING REGIME

Any alleged violations of the PTEE or the Compliance Policies by PHR Clients and/or Contractors will be subject to the sanctioning consequences that apply in each case, according to the with due process and to the stipulations of the respective agreements or contracts.