



TERLICA S.A.S.

Code: PRGD-001

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Program of:
TRANSPARENCY AND BUSINESS ETHICS

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1. INTRODUCTION

For the development of its operations, **TERLICA S.A.S.** (hereinafter The Organization) implements as part of its institutional culture, this Transparency and Business Ethics Program for the Self-Control and Management of Transnational Bribery and Corruption Risks called PTEE, which contemplates compliance with the provisions of its Policies, Code of Ethics and Business Commitment and External Circular No. 100-000011 of 2021 issued by the Superintendence of Companies of Colombia and Circular 20251000000035CS of September 16, 2026 of the Superintendence of Surveillance of Colombia

This program seeks to ensure that all operations are carried out within the current legal framework with the description of the internal anti-corruption and transnational bribery prevention mechanisms , which are mandatory for all employees, directors, partners, counterparties and third parties of the Company.


2. OBJECTIVES

the Senior Management or Highest Management Body of the Organization express the responsibility they have to comply with and promote among employees, shareholders, customers, suppliers, contractors, strategic allies and third parties (hereinafter Counterparties) that interact and maintain relations with The Organization, to have the highest ethical conduct in their operations.

The purpose of the Organization is to document in this Program its commitment to **zero tolerance** for any conduct that is considered bribery or corruption, reinforcing the values, standards and principles established in the Code of Ethics and Business Commitment and Business Commitment, which establishes the obligation to always act honestly and ethically in all its activities. as well as compliance with all current regulations that regulate these issues.

Specific objectives:

- a. Strengthen the corporate culture based on the ethical conduct established in the Code of Ethics and Business Commitment, as well as be consistent between what we say and do.
- b. Prevent damage to the image and reputation of the Organization through the adoption and compliance with provisions that prohibit any form constituting Corruption and Bribery.

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- c. Establish the Organization's guidelines to segment, identify, measure, control, monitor, detect, investigate and correct situations of Corruption and Bribery that occur against the Organization, promoting the establishment of a culture of compliance, safeguarding the reputation of the Organization and enhancing the values incorporated in the Code of Ethics and Business Commitment.

These guidelines are designed to serve as a guide in the actions of all persons who have a business relationship with The Organization, including employees, shareholders, suppliers, contractors, strategic allies and third parties, in accordance with the standards for the prevention and control of the risk of corruption and bribery adopted by The Organization.

3. LEGAL FRAMEWORK

- **Law 599 of 2000:** Colombian Penal Code, Congress of the Republic to comply with the entire set of punitive legal norms framed by the State.
- **Law 1474 of 2011:** Congress of the Republic, Anti-Corruption Statute By which rules are issued aimed at strengthening the mechanisms for the prevention, investigation and punishment of acts of corruption and the effectiveness of the control of public management
- **Law 1778 of 2016.** Identify, evaluate, and validate when conducting an international business or transaction with a foreign public servant. It must perform due diligence that mitigates the material risk of Bribery or Corruption.
- **Law 2195 of 2022:** Congress of the Republic By means of which measures are adopted in the areas of transparency, prevention and fight against corruption and other provisions are issued
- **External Circular 100-000011 of August 9, 2021 of the Superintendence of Companies of Colombia.** For companies that are subject to the supervision of the Superintendence of Companies and will voluntarily adopt the changes that this new circular issues amending Circular No. 100-00003 of July 26, 2016 and provides the new guidelines to establish the Transparency and Business Ethics Programs, as well as the internal audit mechanisms, Anti-corruption and prevention of transnational bribery and corruption in the context of Law 1778 of 2016 and Decree 1736 of 2020.
- **Law 962 of 2005, Article 28:** By which provisions are issued on the rationalization of administrative procedures and procedures of State agencies and entities and of individuals who exercise public functions or provide public services, Article 28: Rationalization of the conservation of books and commercial papers. The merchant's books and papers must be kept for a period of ten (10) years from the date of the last entry, document or receipt, and may use for this purpose, at the merchant's choice, their conservation on paper or in any technical, magnetic or electronic medium that guarantees their exact reproduction.
- Circular 20251000000035CS of September 16, 2026 of the Superintendence of Surveillance of Colombia: which dictates the guidelines on the Transparency and Business Ethics Program - PTEE" of surveillance and private security services.

4. DEFINITIONS

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For the purposes of this Program , the following definitions will be adopted:

Whistleblowing Channel: is the online reporting system for complaints about acts of Corruption and Transnational Bribery, which is available to the Organization so that its counterparts can report acts of corruption and bribery.

Corruption: is a term that generally indicates a person's misuse of their authority, capacity of office, and the rights entrusted to them, as well as authority related to this official status, opportunities, connections for personal gain, contrary to law and moral principles

Counterparty: Any person or entity that participates in relations with the Organization such as: Senior Management, employees, suppliers, customers, authorities, communities, strategic allies, contractors and third parties.

Due Diligence: is the process of constant and periodic review, knowledge and evaluation that the Organization must carry out to its counterparts according to the Risks of Corruption or Risks of Transnational Bribery to which it is exposed.

Risk Factors: are the possible elements or causes that generate Corruption and Transnational Bribery Risk for any Company.

Corruption and Bribery Risk Matrix: is the tool that allows the Organization to identify Corruption Risks or Transnational Bribery Risks.

Maximum Body or Senior Management: Corresponds to the highest management body of the Organization (General Assembly of Shareholders or whoever takes its place).

International Business or Transactions: International business or transaction is understood as business or transactions of any nature with foreign natural or legal persons under public or private law.

Compliance Officer: is the natural person who must lead and ensure compliance with the PTEE policy in order to detect, prevent, manage and mitigate corruption risks or transnational bribery risks.

Politically Exposed Person or PEP: corresponds to the definition established in Article 2.1.4.2.3. of Decree 1081 of 2015, as amended by Article 2 of Decree 830 of July 26, 2021.

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

Transparency and Business Ethics Program or PTEE: is the document that collects and compiles the provisions for the Compliance Policy, in order to identify, detect, prevent, manage and mitigate Corruption Risks or Transnational Bribery Risks that may affect the Company, in accordance with the Risk Matrix, and other instructions and recommendations established in this Program.


Corruption Risks: the possibility that, by action or omission, improper use of power, resources or information, the interests of an entity may be harmed in order to obtain a particular benefit.

Transnational Bribery Risks or ST Risk: is the possibility that a natural or legal person, directly or indirectly, gives, offers or promises to a Foreign Public Servant sums of money, objects of pecuniary value or any benefit or utility in exchange for said public servant performing, omitting or delaying any act related to his or her functions and in relation to an International Business or Transaction.

CO/SO/F Risk: Risk of Corruption, Bribery and Fraud.

Bribery Risk: the possibility of an illegal act occurring in order to offer, give, accept or solicit an undue advantage of value (financial or not) and its negative consequences for an organization, both in the public and private sectors.

Risk of facilitation payments: These are small sums of money given or offered to private or public officials to expedite routine procedures in the exercise of their functions to ensure that they comply with their obligations either more promptly or favorably.

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Fraud risks: the possibility that an organization or individual will suffer financial loss, reputational damage, or legal consequences due to intentional, deceptive, or dishonest acts committed by internal or external persons

5. SCOPE

This Program applies to all processes and people including: senior management, employees, customers, suppliers, shareholders, contractors, subcontractors and third parties, with whom any commercial and contractual relationship is directly or indirectly established to minimize the possibility of situations associated with the risks of Corruption and Bribery materializing in national and international businesses and transactions that may generate deception, breach of trust, economic losses, misrepresentation of the Organization's financial statements and, in general, damage to the reputation of the Organization, its assets and its stakeholders, it being understood that they will refrain from participating in any form of bribery, or corrupt practice, either directly or indirectly.

6. PRINCIPLES

Respect: Respect for every human being, every culture, and the environment. Value the differences and potential of each being, to ensure the fair and equitable growth of Employees, allies, communities and Customers.

- ✓ Integrity: It is the quality of the human being to be coherent in his thinking, feeling, speaking and acting, inspired by the value of honesty.
- ✓ Equity: It consists of giving each one what corresponds to him or her according to his or her needs, merits, abilities or attributes.
- ✓ Solidarity: The value of solidarity is manifested in recognizing in the common good, the meaning of a successful life for all. It involves directing ideas and actions thinking about the collective interest, including one's own.
- ✓ Loyalty: A person's behavior of keeping maximum fidelity in their relationships.

Integration in business: Ensure a sustainable and circular production model that, through the articulation of projects, operations and activities, guarantees the quality of products and services, and the efficiency of the Organization.

- ✓ Efficiency: It occurs when fewer resources are used to achieve the same objective or when more objectives are achieved with the same or fewer resources.


Sustainability: We are committed to contributing to the prosperity of generations to come, with the creation of economically viable, environmentally sustainable and socially responsible production systems.

- ✓ Generosity: Offering help without expecting anything in return.

Love: Passion for what we do with dedication, commitment, effort and commitment. To be the best at doing what we love.

- ✓ Leadership: Process of motivation and encouragement to achieve the objective.

Responsibility: Ability to assume the fulfillment of our commitments and the work skills acquired at the personal and work group level, and guide them towards the achievement of institutional objectives.

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- ✓ Transparency: The quality of acting in accordance with the values and principles established by the Organization, in a sincere and responsible manner, generating trust and security.


"Because that's how our R.I.S.A. identifies us as family"

7. COMPLIANCE POLICIES

The Organization and its organizational culture and corporate values establish the guidelines and directives that must be followed by the Counterparts related to the Organization, in terms of managing the risk of Corruption and Bribery.

- a. The Organization is committed to carrying out its operations maintaining high moral, ethical and compliance with applicable laws and does not promote, nor accept, acts framed within the concepts of Corruption and Bribery in any of its business relationships and promulgates its decision to take all necessary measures to combat them by promoting within its organization the rules of conduct framed in its Code of Ethics and Business Commitment promoting an institutional anti-bribery and anti-corruption culture in its administrative and control bodies, legal representatives, shareholders and in general in all its employees, customers, suppliers, contractors, strategic allies and third parties related to the Organization hereinafter the counterparty.
- b. The Organization does not tolerate any Counterparty achieving economic, commercial or any other type of results, in exchange for violating the law or acting dishonestly or accepting facilitation payments, understood as those payments made or received to ensure or expedite the course of a routine action or actions necessary for the counterparty to have a legal or other right.
- c. The Organization will not maintain links with counterparties in which its directors, or current shareholders, are convicted of criminal activities related to Money Laundering, Corruption and Bribery. Among them, it is not allowed for employees and directors of the organization to offer or receive bribes from national or foreign public officials or officials of international public organizations.
- d. The organization has zero tolerance for bribery between private companies or embezzlement in the private sector, it does not accept influence peddling or abuse of functions and illicit enrichment.
- e. It is not allowed to use resources of The Organization for illegal or improper purposes.
- f. The Organization will report to the competent authorities the acts of Corruption and Bribery identified in the investigations or previous verification work.
- g. The Organization will avoid having any type of relationship with suppliers, customers, collaborators and partners who are included in the restrictive lists on Transnational Bribery or from whom there are doubts about the origin of their funds, have links with organizations outside the law.
- h. The remunerations and bonuses that may be generated in favor of the collaborators will be regulated by the provisions of the employment contract.
- i. The other policies enshrined in the MGD-001 Money Laundering Prevention Manual

In this sense, the Organization, through its employees and managers, will promote among its Counterparts, the knowledge and commitment expressed in the Transparency and Business Ethics Program, in order to prevent that, directly or indirectly, giving, offering or promising a foreign or national public servant sums of money, any object of pecuniary value or other benefit or utility, in exchange for him performing, omitting, or delaying, any act related to the exercise of his functions and in relation to a national or international business or transaction; conducts that also extend to the

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private sphere in the sense of not incurring in the same in relation to officials of private sector companies.

To combat the risk of Corruption and Transnational Bribery, the Organization defined the following policies regarding actions that constitute a source of high risk in terms of acts of Corruption and Transnational Bribery, which are mandatory for all employees:

7.1 Policy for the Giving and Receiving of Gifts and Invitations

The delivery of gifts to third parties is restricted.

Employees shall not give money or objects to public officials or representatives of private companies for the purpose of obtaining benefits for the economic activity of the Organization or of influencing administrative, legal, judicial or contractual decisions in which the Organization has an interest.

No employee will use his or her position in The Organization to solicit any kind of personal favor, payment, discount, travel, accommodation, gifts, or loans from Counterparties, whether these are government entities or private companies.

No collaborator will ask for or accept from third parties favors or gifts whose nature or importance may incline him to favor the donor or servant in the contracting of services by The Organization. In case of doubt, the employee should consult with his or her immediate supervisor or the Compliance Officer.


No employee may obtain or seek personal benefits derived from the information obtained in his or her capacity as an employee of The Organization.

The gifts that can be received are suitable for the following characteristics:

- That they are corporate gifts, that is, those that are given to promote the services offered by the giver, such as marketing activities.
- That they are not offered within a context that can obviously influence the decision of the recipient and in favor of the person who grants it.
- That corresponds to invitations to institutional events, which are made to promote or publicize products or services related to the commercial activity of the Organization, which must have the written approval of the hierarchical superior of the collaborator along with the due justification.
- Invitation to training or institutional events related to the position or functions of the collaborator within the Organization, which must have the written approval of the collaborator's hierarchical superior along with due justification.

Consequently, it is expressly forbidden to give or receive gifts and/or invitations that do not fall within the aforementioned exceptions and, especially those that:

- Are materialized in trips, hotels, cruises, shows, sporting events.
- They come from a national or foreign public official.
- Correspond to cash, transfers, vouchers, discounts in commercial establishments to acquire goods or services, among others.

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In case of doubt about the possibility of giving or receiving a certain gift, or accepting or offering an invitation, the report of the gift or the invitation to the Compliance Officer must be made to the Immediate Superior, who will determine the actions to be taken.

Any exceptions to this provision must be contemplated and authorized in the Organization's current Gifts Policy. See POGD-002 TERLICA Gifts Policy.

In the event that Senior Management authorizes the receipt or delivery in securities, it must comply with the due diligence procedure established in the procedure for the creation and updating of suppliers and customers together with all the documentation and verification of the bank certification and the due diligence of the final beneficiary and consultations on lists and Conflict of Interest report is carried out in accordance with the provisions of our Code of Ethics and Business Commitment and this Transparency and Business Ethics Program.

7.2 Policy on travel expenses, food, lodging, entertainment and/or travel activities

The trips made by the collaborators, at the expense of the Organization, must strictly obey the exercise of their functions within it. In this sense, for the recognition of travel expenses, the request for the value and amount must be made to the immediate boss who will review and then to the Management for approval, always keeping the proportionality of the expense vs. days and city. It will be made official with the authorization of the advance of the trip signed by the Immediate Boss and the Manager.

Once the trip is over, all collaborators must deliver the list of expenses in the format defined by the Organization along with the respective invoices, electronic transfers, and internal records of cash delivery, so that they can support the respective expense or expense in the accounting item.


7.3 Donation Policy

No collaborator is authorized to allocate the resources either in money or in kind of The Organization for donations, to natural or legal persons or whether they are private or public entities,

The Organization is aware of the economic needs of vulnerable groups in Colombia and abroad, however, it is prohibited to allocate donations to hide or disguise Acts of Corruption, so The Organization will refrain from making donations if the circumstances could make them appear as attempts at Acts of Corruption, therefore The Organization undertakes to guarantee the lawful investment of the donated funds and the complete tracing of all donations, from disbursement to use if made.

All donations must be authorized by Senior Management, after verifying the following conditions:

- Comply with the requirements for the creation of the third party according to the Creation and Update of Suppliers procedure.
- That due diligence has been carried out for the real and exhaustive knowledge of the bank certification and beneficiary counterparty, according to the Money Laundering Prevention Manual, MGD-001
- That there is a formal request for donation by the beneficiary counterpart, unless the initiative to donate comes directly from the Assembly.
- All donations made are supported in the Donation Certificate or delivery certificates.
- Be aligned with the Social Responsibility Program.
- Also comply with the provisions of our Code of Ethics and Business Commitment.

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7.4 Political Contributions Policy

The Organization may make contributions to finance candidates, campaigns, parties or national political movements under the exclusive decision of the Highest Social Body.

The decision and approval of the political contribution will be recorded in a record and will comply with the requirements established in the applicable legislation.

These contributions shall in no case seek to obtain benefits in favor of the Organization's own interests. The Organization shall comply with the due diligence procedure established in the procedure for the creation and updating of suppliers and customers together with all the documentation and verification of the bank certification and due diligence be carried out on the final beneficiary and consultations on lists and report of Conflict of Interest in accordance with the provisions of our Code of Ethics and Business Commitment and this Program of Transparency and Business Ethics.

7.5 Policy on remuneration and payment of commissions to contractors and collaborators, with respect to national or international business

All payments made to the Contractors must be in writing and supported by the values stipulated in the Contract or in the purchase order, and may be audited by specialized firms if needed or requested, confirming the legality of the payments, the non-diversion of resources, and the non-concealment of payments to third parties through the Contractor, or payments to Contractors without contractual justification or purchase order.


Payments for these concepts will be made through bank transactions, being duly supported by invoices, collection accounts prepared according to the terms established in the contract or purchase order, in such a way that they are consigned to the bank account registered by the contractor at the time of completing the linking process.

All payments for services abroad must be made through banking channels, where it is possible to track all movements and payments, comply with the Colombian exchange regime and be channeled through authorized banking entities or through clearing accounts duly registered with the Bank of the Republic.

If, within the framework of the negotiation, the parties establish within the contract or purchase order the recognition and payment of commissions specific to the transaction, there should be no doubt about the nature of the same and it will be necessary that the way in which the generating event is agreed and the payment of the same, be clear and do not leave room for interpretation. This will prevent disguised payments from being made through commissions, a practice that is expressly prohibited.

No payment is allowed to third parties other than those involved in the contractual relationship.

No employee will accede to requests from Contractors to make payments that violate the Transparency and Business Ethics Program.

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The remuneration and commissions that may be generated in favor of the collaborators are regulated by the provisions of the employment contract.

7.6 Facilitation Payment Policy

The Organization requires its Shareholders, Directors and other Collaborators, Contractors and Strategic Allies to expressly commit to this Program, in which none of them may, directly or indirectly, passively or actively, give, offer or promise to a foreign or national public servant i) sums of money, any object of pecuniary value or other benefit or utility, in exchange for him (i) performing, omitting, or delaying, any act related to the exercise of his functions and in connection with a national or international business or transaction; conducts that also extend to the private sphere in the sense of not incurring in the same in relation to officials of private sector companies.

7.7 Anti-Corruption Clauses Policy in Contracts

The Organization undertakes to limit as much as possible in the execution of the contracts it signs in both the public and private sectors, the risk of acts of corruption, collusion, unfair competition, falsification of public and private documents, derisory or artificially low prices or any breach of contractual requirements. To this end, in all contracts entered into by The Organization with third parties, clauses will be included that protect and offer legal solutions to The Organization when its counterpart carries out Acts of Corruption.

In accordance with the contract concluded, the Contractor must comply with the Anti-Corruption Provisions and the burdens imposed on it by this program, under penalty of the Organization being able to make use of the contractually agreed termination powers.

7.8 Conflicts of interest and rules regarding the PTEE


The members of Senior Management, Employees, Customers, Suppliers, Counterparties, Shareholders, Distributors, Strategic Allies and other related third parties, are in a situation of conflict of interest, when they must make a decision, or perform or omit any action, that by reason of their position, role or functions leads them to choose between the interest of the Organization and their particular interest or that of a third party. so that if he opted for either of the latter, he would obtain an undue pecuniary and/or extra-economic benefit that he would not otherwise receive, thus ignoring a legal, contractual, statutory or ethical duty.

Conflicts of interest arise in the Organization in accordance with the provisions of the Code of Ethics and Business Commitment.

The procedure for identifying, reporting, evaluating and managing possible or real conflicts of interest that may arise in the performance of the functions may be reported through the following channels:

- Sent to the Human Development Area
- Filling out a PQRS in Cadi to the Human Development area as a Petition
- In case you require confidentiality through the ethics line

When the petition arrives, it is initially reviewed by the Department of Human Development and verifies the information provided and analyzes the nature of the conflict and, if necessary, can request more information and begins the analysis of the case.

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In the event that the conflict involves senior managers and there is a relevant strategic, financial or reputational impact, it will escalate to a decision of higher hierarchy in the Vice Presidencies.

The area in charge of Human Development or the Vice Presidency assesses the risk if it exists and defines and communicates to the area the mitigation measures whether it is an acceptable, manageable or incompatible decision. It must be communicated in writing to the applicant.

Conflict of interest for the involvement of Politically Exposed Persons or public officials: the Organization has controls to prevent the involvement of former public officials in the private sector within the deadlines and under the terms established in current regulations, as well as the involvement of Politically Exposed Persons (PEPs) and national and foreign officials, which may generate conflicts of interest. In these cases, prior to any relationship, normal and extended due diligence is carried out to identify, evaluate and mitigate the associated risks, including the verification of disqualifications, legal restrictions, possible conflicts of interest and applicable management measures, in order to ensure transparency.

7.9 Due Diligence:

The organization has implemented a procedure for due diligence to know the counterparty, this due diligence is carried out in the query software, previously having the respective data processing authorization.

Due diligence processes in the company refer to:


- a. Knowledge of customers.
- b. Knowledge of shareholders.
- c. Knowledge of the members of the Board of Directors or the highest corporate body.
- d. Knowledge of employees.
- e. Knowledge of suppliers and contractors
- f. Knowledge of recipients of donations or sponsorships.
- g. Knowledge of Politically Exposed Persons (PEP).

To know the Counterparty, we carry out due diligence in order to avoid hiring third parties with investigations in crimes such as: bribery, transnational bribery, corruption, fraud and any crime or source crime, ensuring that our activities and relationships with third parties are carried out through secure and transparent processes in accordance with the policies of the Organization, our Code of Ethics and Business Commitment, Manual for the Prevention of Money Laundering and current regulations.

Third-party inquiries are made at the time of the creation and updating (annually) of the third party in accordance with the information received by the application for this purpose and are made by the Director of Business Ethics and the queries of the selection process of personnel for entry and annually to the current personnel are made by the Department of Human Development, these queries are carried out through the Query Software following the following premises:

The Due Diligence process is carried out in compliance with these requirements:

- Request for documentation according to the linking and creation procedure.
- Perform Due Diligence in the consultation software which allows you to consult binding and restrictive lists, where you must enter the company nit number, legal representative and

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shareholders' and partners cards and/or for foreign companies the Office Director who acts as legal representative.

- Identify if they have PEPs, Politically Exposed Persons and perform extended due diligence on their relatives up to the second degree of consanguinity, if applicable
- Review potential conflicts of interest in ties with the company or its employees and/or shareholders.
- Internet review of news associated with the company and/or person, verifying that the news has no links to illicit or ethical issues.
- Identify the geographical area in which they are located
- Analysis of financial statements comparing and reviewing if you have high capital gains.
- When warnings of bribery and corruption are found, extended due diligence is requested.
- Each case must be analyzed in order to have greater knowledge in the case of finding warnings.
- For cases where the compliance officer requires more information, he or she can send an email or letter to the third party requesting further information that was evidenced in public sources in order to complete the extended due diligence.

Due Diligence Results:

After the due diligence process is executed, a favorable or unfavorable result will be delivered, for cases that do not comply with internal policies and/or procedures, the compliance officer will make a report with the results and deliver an unfavorable response, both concepts will be recorded in the third-party creation and update software.

In cases where it is warranted and serious warnings are found, the compliance officer will make the Suspicious Transactions Report in the UIAF application.

Annually, at the time the third party updates its information in the third-party software, due diligence will be performed as a follow-up to the third party.


7.10 Integrity of accounting:

In compliance with the principle of transparency within the PTEE, the Senior Management, the Legal Representative, the Compliance Officer, the Tax Auditor and the Internal Audit, ensures that the books, records, inventories, financial statements, vouchers and other papers have truthful, complete and updated information on its commercial activities, commercial operations and its assets. The storage times will be maintained according to the provisions of the Colombian Commercial Code and other applicable provisions.

The control areas maintain the prevention mechanisms in the case of adulteration, evasion, destruction of files, leakage of privileged information, vulnerability and alteration of data in the systems, alteration of the justification of cash transactions, concealment of the origin, legality and destination of resources, and in general those related to corruption and bribery.

7.11 Transparency in Business Management:

The Organization complies with the accountability strategy in accordance with Articles 45 to 48 of Law 222 of 1995, which allows it to ensure the delivery of basic and interesting information to its

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counterparts and supervisory entities, including the community in general, through different mechanisms such as publication on its website, Disclosure on social networks and delivery in meetings with its partners, board of directors or highest corporate body, respecting the legal provisions of classification and confidentiality of information:
In the case of the website, it has the following information:

- a. Full name of the obligated subject;
- b. Mission and vision;
- c. Structure of the portfolio of services;
- d. Address, municipality and department of the main domicile, agencies and branches;
- e. Contact details for judicial notifications;
- f. Information on your area(s) of operation (headquarters or regional);
- g. Link to social networks;
- h. Contact details for suppliers, customers and the community in general (email, mailbox and/or telephone);
- i. PQRSF Line;
- j. Anti-corruption or complaint line to report acts of corruption, illegal conduct or ethical misconduct;
- k. Policy for the protection of the whistleblower or whistleblower of acts of corruption;
- l. Personal data protection policy.
- m. Administrative act of the state permit and supervisory entity.


Note. Security Departments shall not apply subparagraphs b, c, and d. Likewise, Corporate Governance information must be disclosed such as:

- a. Organizational structure of the legal entity;
- b. The Transparency and Business Ethics Program (PTEE);
- c. The code of ethics and good governance;
- d. Corporate values and principles;
- e. Unreserved financial information;
- f. Job announcements;
- g. Calls and news for the communities in the respective areas of operation.

The delivery of general information for investors will be treated according to the privacy policies and will be kept and delivered by the Legal Department in the CADI system, where the minutes of the decisions taken in the shareholders' meeting or meeting, notices of call, issuance of shares and offer notices are kept. risk ratings, dividend history, regulations and quarterly results.

7.12 Documentation conservation and custody policy:

The policy for the Conservation and custody of documentation and its records related to compliance with the rules on risk prevention and control Corruption, Bribery and Fraud must be kept for a term of not less than ten (10) years. In accordance with Article 28 of Law 962 of 2005, this policy includes all records, books, documents and media generated, as well as the documents that support the decision to determine an operation as suspicious, the reports submitted to the UIAF, as well as the other required forms, documentation and supports within the framework of the Transparency Program and it will be the responsibility of the Compliance Officer to keep them centralized, sequential and chronological, with the due guarantees, for a term of not less than ten (10) years.

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These media may be kept, at the discretion of the Compliance Officer, in physical format or in technical, magnetic or electronic media, provided that their faithful and exact reproduction is guaranteed. The Compliance Officer will be responsible for the custody, integrity, availability and access control of said documentation.

8. ELEMENTS OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

In accordance with the structure and operational functioning of the Organization, this Transparency and Business Ethics Program has been implemented and adopted, for the control and management of risks related to Corruption and Transnational Bribery.

8.1 Outreach and Training

The Organization has designed communication and dissemination mechanisms that guarantee compliance with the regulatory requirements regarding the Transparency and Business Ethics Program. With the implementation of internal training, the policies, internal and external standards, procedures related to the Transparency and Business Ethics Program are made known, with the purpose of generating in employees an organizational culture oriented to the management of the risk of Corruption and Bribery in international negotiations and transactions, to prevent and control that the Organization is used for these purposes.

The training on the Transparency and Business Ethics Program is designed, programmed and coordinated through plans aimed at all areas that, according to the risk analysis, are exposed to the risks of Corruption and Bribery in international negotiations and transactions.


8.1.1 Guidelines

- a. Any person who joins The Organization and is part of the areas with high vulnerability to risk of Corruption and Bribery in international negotiations and transactions must receive, at least once a year, training on the policies, procedures, tools and controls adopted to comply with the PTEE.
- b. All employees of the Organization will be notified of the changes and/or updates made to the PTEE Program: For cases where the modifications have representative and important changes, training will be scheduled to publicize the new standards and parameters of the PTEE.
- c. When carrying out the training, a written record will be left indicating the following information: date, topic covered, areas and names of the attendees.

8.1.2 Training Managers

The Compliance Officer of the Transparency and Business Ethics Program has the following responsibilities in the subject of training:

- a. Verify the topics to be presented in the training to the attendees, which must be related to the provisions of the Transparency and Business Ethics Program.
- b. Consider for new employees that training on the topics of the Transparency and Business Ethics Program be carried out in the inductions.
- c. To carry out the annual schedule to carry out the training of the Transparency and Business Ethics Program.

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- d. Have the Transparency and Business Ethics Program available for the necessary consultations required by the Organization's employees.

8.1.3 Training Elements

The way in which The Organization carries out the process of public disclosure about the PTEE model is through internal and external communications or other public dissemination mechanisms, including:

- Institutional emails
- Socializations
- Videos
- Informational boards in key areas
- Direct Communication

8.1.4 Communication Channels

In order for Counterparties to have at their disposal the necessary means to report any breach of the Transparency and Business Ethics Program, The Organization has the following reporting channels that allow reporting situations of risk of Corruption and Bribery or Fraud for international businesses and transactions, as well as behaviors and/or acts related to the possible materialization of the risks associated with activities criminal; conduct and/or acts related to violation of the human rights enshrined in the Political Constitution of Colombia, or conduct and/or acts related to harassment, abuse, and attacks, labor, sexual or discrimination and in general any comments, concerns or suspicions that may be had in relation to this risk management system:


- a. Secure Line or Whistleblowing Line:** The Organization has an outsourced secure reporting line, through which incorrect acts related to Corruption and Bribery can be reported, or when there is any doubt or concern about the Transparency and Business Ethics Program or any breach of our Code of Ethics and Business Commitment.

- Toll Free: 018007522222
- https://etica.resguarda.com/daabon/main_es.html

The Organization has a committee for the review of complaints, made up of 3 people who will be chosen by Senior Management fulfilling the following profile: have a managerial position, seniority of more than 3 years in the organization, stand out for being a responsible and honest person. This committee will receive the cases through the tool and will carry out the analysis and culmination of the case in a safe way, responding to the complainant, transferring the case to the corresponding areas and escalating the cases that are merited to the superiors, with the aim of reaching a consensus to a conclusion, generating its action plan according to the case and everything related must be recorded in the tool of the line.

-All complaints will be studied professionally, guaranteeing impartiality and respecting the whistleblower, at no time is it allowed to present reprisals or threats to the whistleblower, but on the contrary their protection will always be guaranteed under the principles of confidentiality and anonymity.

To guarantee it, the effectiveness of this reporting channel must be managed appropriately, guaranteeing anonymity in the complaint and, above all, the guarantee that no retaliation will be taken

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against the whistleblower; Contact must be maintained with the complainant and establish the way through which the respective complaint will be handled, request additional information or clarification if required, and give a final response to the actions or decisions.

The Organization also promotes and has the availability of the public channels of complaints of the Superintendencies and the Presidency for transnational bribery and corruption at the following links:

- <https://www.supersociedades.gov.co/es/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional>
- <http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion>
- Complaints line set up by the Superintendence of Companies, available at link <https://www.supersociedades.gov.co/denuncias>.
-
- Complaint line of the Superintendence of Surveillance, available at the following link: <https://www.supervigilancia.gov.co/> and by email contactenos@supervigilancia.gov.co
-
- Complaint channel of the Secretariat of Transparency of the Presidency of the Republic channel: <https://portal.paco.gov.co/index.php?pagina-denuncie>

b. Email of the compliance officer: the email is intended to be the channel to inform, consult and/or report to the Compliance Officer issues related to the risks of Corruption and Bribery for international business and transactions.


The reporting channels mentioned above have a high degree of confidentiality, which ensures proper administration of the reported matters and guarantees Resguarda's whistleblower safety and protection policy

8.1.5 Compliance

All Employees of the Organization must strictly comply with the different provisions implemented for the operation of the Transparency and Business Ethics Program, but in the event that they fail to comply with the regulations, policies and procedures defined, the following guidelines will be taken into account:

8.1.5.1 Procedure for Non-Compliance

Failure to comply with the rules, policies and procedures on the PTEE by employees exposes the Organization to a greater degree to the risk of corruption and bribery in national and international business and transactions, which may lead to the imposition of sanctions by state agencies that exercise inspection, surveillance and control. Therefore, the PTEE Compliance Officer must be informed by the person or area that detected or in cases in which he or she evidences situations that violate the policies, procedures or controls defined in this Program, he or she must make the respective report and send it to initiate the respective disciplinary process, aimed at determining the type of sanction to be applied according to the impact of the omission and the seriousness of the offense. the fault.

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In accordance with the provisions of the Internal Work Regulations, the Employment Contract and the internal procedures within the principles of justice, equity and unifying the legal and regulatory criteria and parameters, the disciplinary process will be carried out.

On the other hand, the Compliance Officer will inform Management and Senior Management of the situations presented in order to adopt the necessary measures to maintain adequate control and prevent the materialization of the risk of Corruption and Bribery in national and international businesses and transactions.

In any case, employees who fail to comply with the policies and procedures contained in this Program and those related to the Transparency and Business Ethics Program will be subject to sanctions as established in the Internal Work Regulations and other related provisions.

8.1.5.2 Preventive measures

The following premises are taken into account:

- a. **Authority:** The Organization's Senior Management undertakes to exercise the powers they have in relation to the prevention and control of the risk of Corruption and Bribery in national and international businesses and transactions, in order to support the decisions or recommendations of the Compliance Officer.
- b. **Resources:** for the development of this Program, the Organization will allocate the human, technological and economic resources necessary to ensure the proper execution of the tasks of prevention and control of the risk of Corruption and Bribery in national and international businesses and transactions.


8.1.5.3 Corrective measures or sanctions:

The Organization's Senior Management, in accordance with its principle of **zero-tolerance** for acts of corruption and bribery and its commitment to permanent compliance with Policies, Code of Ethics and Business Commitment, and Procedures, expects all managers, employees, customers, suppliers, strategic allies, contractors and third parties to comply with the provisions of this program and promote compliance.

Failure to comply with this Program will be subject to disciplinary, administrative, criminal, patrimonial and labor sanctions that may cause the termination of the contract as enshrined in the regulations in force. In particular, the following are considered serious misconduct:

- a. Not knowing, understanding and putting into practice the policies and procedures of the Transparency and Business Ethics Program.
- b. Failing to comply with due diligence procedures and controls.
- c. Failing to comply with the rules set out in the Code of Ethics and Business Commitment.
- d. Failure to execute the controls established to mitigate the risks of Corruption and Bribery in national and international businesses and transactions.
- e. Failing to comply with responsibilities regarding the Transparency and Business Ethics Program

In the event that any of the Organization's employees, regardless of their area of work, performs or is aware of any conduct contrary to this Program, tolerates and/or consents to such conduct, it will be considered a breach.

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In the event of non-compliance, the Organization will apply the disciplinary and sanctioning procedures established in the employment contracts and in the Internal Work Regulations, and the applicable labor standards for this purpose, since this will be classified as a serious offense, which can even lead to dismissal with just cause.

Failure to comply with this Program by any contractor will entitle the Organization to enforce the anti-corruption clauses included in the respective contracts, and may unilaterally terminate the contract.

9. FUNCTIONS OF THE MANAGERS

9.1 General Assembly or Senior Management


The General Assembly, as the highest governing body of the Organization, must fulfill the following functions in relation to the Transparency and Business Ethics Program:

- a. Approve and update the Policies of the Transparency and Business Ethics Program (PTEE);
- b. To approve the Code of Ethics and Good Governance of the Transparency and Business Ethics Program (PTEE);
- c. Approve the Manual of Procedures of the Transparency and Business Ethics Program (PTEE);
- d. Select and designate the Compliance Officer and the respective alternate for the PTEE in accordance with the requirements established in this Circular;
- e. Evaluate and analyze in a timely manner the reports on the operation of the PTEE, on the proposals for corrective measures and updates presented by the compliance officer and the internal audit. This must be recorded in the minutes of the corresponding body;
- f. Analyze in a timely manner the reports and requests submitted by the Compliance Officer;
- g. To order and guarantee the technical, logistical and human resources necessary to implement and keep the PTEE in operation according to the requirements made for this purpose by the Compliance Officer;
- h. Grant autonomy to the compliance officer for decision-making on the management of the Risk of Corruption, Bribery and Fraud;
- i. To order the pertinent actions against the partners or associates who have management and administrative functions in the legal entity obligated service, the employees, and administrators, when any of the above violates the provisions of the PTEE;
- j. Ensure effective disclosure and awareness of PTEE policies to employees, associates, contractors, and other stakeholders;
- k. Ensure the implementation of appropriate channels to allow anyone to report, confidentially and securely, suspected breaches of the PTEE and possible suspicious activity related to corruption and bribery.

9.2 *Verify that the compliance officer and the legal representative carry out the activities designated according to this Program.* Legal representative

The legal representative must comply with the following functions in relation to the Transparency and Business Ethics Program:

- a. To submit, together with the Compliance Officer, for the approval of the board of directors or the highest corporate body, the proposal of the PTEE and its updates, as well as its respective procedures manual;
- b. Study the results of the CO/SO/F Risk assessment carried out by the Compliance Officer and establish the corresponding action plans;

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- c. Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the PTEE;
- d. Efficiently allocate the technical and human resources, determined by the highest corporate body, necessary to implement the PTEE;
- e. Ensure that the activities resulting from the development of the PTEE are duly documented, so that the information is allowed to meet criteria of integrity, reliability, and availability. The documentary supports must be kept in accordance with the provisions of Article 28 of Law 962 of 2005, or the regulation that modifies or replaces it;
- f. Certify to the Superintendence of Surveillance and Private Security compliance with the provisions of Circular 2025100000035CS, when required;
- g. Certify that the Compliance Officer and his/her alternate meet the requirements set forth in Circular 2025100000035CS and inform the Superintendence of Surveillance and Private Security in writing, within ten (10) business days following the appointment;
- h. Submit the resume of the Compliance Officer, his alternate and a copy of the minutes of the highest corporate body or board of directors, in which the appointment is recorded. The same procedure must be carried out when there is a change of Compliance Officer;
- i. Propose and guarantee the appointment of a new Compliance Officer in the event of the permanent or absolute absence of the principal. For which he will have a period of ten (10) business days for his appointment. In turn, it must inform the Superintendence of Surveillance and Private Security in writing, in accordance with the provisions of paragraph (g) of Circular 2025100000035CS.

9.3 Minimum requirements to be designated as a PTEE Compliance Officer.


The Highest Body and the Legal Representative must guarantee that the PTEE operates under the principles of efficiency, efficiency and effectiveness. In this regard, the compliance officer and his or her deputy must meet at least the following requirements:

- a. The compliance officer must be domiciled in Colombia;
- b. The compliance officer must be a technician, technologist or professional, and accredit training in Risk Management demonstrable through a minimum diploma of ninety (90) hours or specialization;
- c. Not belong to the administration or corporate bodies, to the tax auditor's office or to act as an internal control auditor, or to perform similar functions or take their place in the obligated legal entity;
- d. In any case, the Compliance Officer may be an official of the obligated legal entity as long as he or she is not immersed in the disqualifications established in Paragraph c) of this article;
- e. The Compliance Officer may exercise his/her functions in up to five (5) legal entities obliged in Circular 2025100000035CS;
- f. SARLAFT 2.0 Compliance Officers and their alternates may perform the functions of Compliance Officer of the Transparency and Business Ethics Program (PTEE);
- g. The Compliance Officer and his/her alternate shall be appointed by means of minutes by the highest corporate body or board of directors.

9.4 Compliance Officer

The Compliance Officer of the Transparency and Business Ethics Program of The Organization will have the following functions:

- a. Ensure compliance with the PTEE under the principles of efficiency, effectiveness and effectiveness, guaranteeing its optimal functioning;
- b. Carry out the CO/SO/F risk assessment to which the company is exposed;

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- c. To submit to the highest body of the legal entity or board of directors evaluation and analysis reports on the efficiency and effectiveness of the PTEE on a semiannual basis;
- d. Submit to the Superintendence of Surveillance and Private Security evaluation and analysis reports on the efficiency and effectiveness of the PTEE on a semiannual basis;
- e. To design and update the PTEE in accordance with the guidelines given in this External Circular;
- f. Guarantee the development of audits on the operation of the PTEE at least once (01) a year. The audit report must be submitted to the highest corporate body or board of directors in order to make the pertinent adjustments that guarantee the effective functioning of the PTEE;
- g. Guarantee updates to the PTEE when changes arise in the context or at least once every two (2) years. To this end, it must present to the highest corporate body or board of directors the proposals and justifications of the corrective measures and updates suggested to the PTEE;
- h. Execute the development of internal training programs in order to strengthen an anti-corruption, anti-bribery, and anti-fraud culture within the obligated entities;
- i. To evaluate the reports submitted by the internal audit or whoever performs similar functions or takes its place;
- j. To inform the Superintendence of Surveillance and Private Security of any component established herein by Circular 2025100000035CS, when required;
- k. Verify compliance with due diligence procedures within the organization;
- l. To ensure the proper filing of documentary supports and other information related to the management and administration of the PTEE;
- m. Design the methodologies for identifying, measuring, controlling, and monitoring the risk of CO/SO/F that will be part of the PTEE;
- n. To report to the Secretariat of Transparency of the Presidency of the Republic those cases that may be associated with corruption, bribery and fraud;
- or. Prepare the Suspicious Transactions Report (STR) to the UIAF Financial Information and Analysis Unit.
- p. To report to the Secretary of Transparency of the Presidency of the Republic the acts that they detect associated with corruption or bribery risks in the following channel:
<https://portal.paco.gov.co/index.php?pagina-denuncie>


9.5 Ethics Committee

The Ethics Program includes at least the following functions:

- a. Evaluate controversies, conflicts and faults related to the Code of Ethics and Business Commitment
- b. Promote the ethical culture within the organization, as well as periodically review and update the regulations of good practices and conduct of people in the company's operations.
- c. Ensure that all reports of deviations, faults incurred, or non-compliance with current rules and regulations that are received through any internal or external means are received and attended to
- d. Establish sanctions and action plans in cases related to breaches of the Code of Ethics and Business Commitment that represent a significant negative impact on the company.
- e. evaluate the Whistleblowing Channels and analyze if their strategy works correctly or if they need to make adjustments.
- f. promote values and principles at all levels, as well as promote integrity plans under ethical policies of zero-tolerance for the most serious acts.

9.6 Employees

The Ethics Program includes at least the following functions:

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- a. Promote the culture of compliance with the rules, policies, and procedures of the Transparency and Business Ethics Program within the work area and their co-workers.
- b. Serve as a liaison with the Compliance Officer and provide support and inform him of warning signs that he detects to strengthen the work of prevention, control and administration of the Transparency and Business Ethics Program.
- c. Attend training and training on topics of the Transparency and Business Ethics Program
- d. Promote improvements if considered to strengthen controls in the area of prevention of the risk of Corruption and Bribery.

9.7 Tax Auditor:

The company's Statutory Auditor will have the following functions with respect to the PTEE:


- a. To report to the competent authorities any act of corruption that it becomes aware of in the performance of its functions. In fact, Article 32 of Law 1778 of 2016, which adds numeral 5 of Article 26 of Law 43 of 1990, imposes on tax auditors the express obligation to report to the criminal, disciplinary and administrative authorities, for the alleged commission of crimes, which they detect in the exercise of their position. Still, despite professional secrecy.
- b. They must bring these facts to the attention of the corporate bodies and the administration of the company.
- c. The corresponding complaints must be filed within six (6) months following the time the tax auditor became aware of the facts
- d. You should pay special attention to alerts that may give rise to suspicion of an act related to a possible act of Corruption.
 - e. To comply with the functions of this body expressly indicated in the law, in particular Article 207 of the Commercial Code, which indicates, in particular, the obligation to collaborate with the government entities that exercise the inspection and supervision of companies, and to submit to them the reports that are necessary or requested.

Likewise, the fiscal auditor must submit an annual report to the highest corporate body or board of directors and to the compliance officer, in the face of the inconsistencies and shortcomings detected with respect to the operation of the PTEE or the established controls.

9.8 Internal Audit:

Without prejudice to the functions assigned in other provisions to internal audit, recommends as a good business practice, which may be included in the annual audit plans for the review of the effectiveness and compliance of the PTEE, in order to serve as a basis for both the compliance officer and the administration of the obligated entities to be aware of the deficiencies of the PTEE and determine their possible solutions.

In this sense, the result of such internal audits must be communicated to the legal representative, the compliance officer and the highest corporate body or board of directors.

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10. STAGES OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

10.1 *Identifying the risk of corruption and transnational bribery*

The identification of the risks of Corruption and Transnational Bribery is based on the analysis of the particularities and activities of the Organization, in its size, structure and delegation of decision-making power. Regarding the services it offers, its nature and complexity, the business model and the parties involved, both private and public, are taken into account.

With the result of the diagnosis, an interview is carried out with the areas and employees with the greatest exposure to risk.

10.2 *Measuring or assessing the risk of corruption and transnational bribery*

For the measurement of the risks Prevention of Corruption and Transnational Bribery, that is, the calculation of the possibility or probability of occurrence and impact, once the risk identification phase was completed, the following procedure was followed:

- a. Inherent risk (before applying controls) and residual risk (once controls are applied) scenarios were put forward
- b. Each participant was asked to rate the probability of occurrence and the possible impact of each identified risk, both before and after the implementation of the controls determined by The Organization.

For the measurement or evaluation of Risk, the following scales were used:

Probability, understood as a measure (expressed as a percentage or ratio) to estimate the possibility of an incident or event occurring or materializing (risk), will be measured through the following scale of probabilities:

PROBABILIDAD		
DESCRIPCIÓN	CALIFICACIÓN	RANGO
Certeza	5	81% al 99%
Probable	4	61% al 80%
Posible	3	41% al 60%
Improbable	2	21% al 40%
Raro	1	0.1% al 20%

Table 1. Probability of Risk

The impact, understood as the effect that the materialization of a risk could have, whether it is quantifiable or not, will be measured through the following scale:



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MEDICION DEL RIESGO CORRUPCION Y SOBORNO		
IMPACTO		
DESCRIPCIÓN	CALIFICACIÓN	RANGO
Catastrófico	5	81% al 99%
Mayor	4	61% al 80%
Moderado	3	41% al 60%
Menor	2	21% al 40%
Insignificante	1	0.1% al 20%

Table 2. Impact of Risk

For the measurement or evaluation of risks, they must be qualified taking as a reference the two previous variables (Probability and Impact) in relation to each risk factor and the associated risks respectively, and then multiply their values, and obtain the Inherent Risk rating, that is, without the implementation of controls. The level of Inherent Risk will be the result of applying the following formula:

Formula: (Probability) x (Impact) = Inherent Risk

- **Risk Prioritization**

With the qualification obtained through the methodology described above, the individual measurement of each of the identified risk events is achieved and the risk area in which they are located is graphically established. Once consolidated in a risk matrix, the action or decision-making plans to be implemented are identified and proposed, with the help of a measurement table, as follows:


MAPA DE RIESGOS DE CORRUPCION Y SOBORNO						
PROBABILIDAD	Certeza	5	10	15	20	25
	Probable	4	8	12	16	20
	Posible	3	6	9	12	15
	Improbable	2	4	6	8	10
	Raro	1	2	3	4	5
		Insignificante	Menor	Moderado	Mayor	Catastrófico
		IMPACTO				

Table 3. Risk Map

Each of the calculated risk levels implies an action to be taken, as indicated in the following table and according to the area identified in the risk matrix, as follows:

NIVEL DE RIESGO		
Nivel de Riesgo	Tratamiento	Equivalencias Generales
Riesgo Extremo	Requiere acción inmediata.	21 a 25
Riesgo Alto	Necesita atención de la alta gerencia.	16 a 20
Riesgo Moderado	Debe especificarse responsabilidad gerencial.	11 a 15
Riesgo Menor	Revisión de la aplicación de procedimientos de rutina.	6 a 10
Riesgo Bajo	Administrar mediante procedimientos de rutina.	0 a 5

Table 4. Risk Level

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11. RISK CONTROL AND MONITORING

In order to reduce the possibility or probability and/or impact in the event that the inherent risks materialize, the Organization establishes controls based on:

- **Legal regulations:** Laws, Decrees, Circulars, Resolutions, among others.
- **Identified risks or internal events:** Situations of risks or events presented historically (fraud, findings or audit reports, reports of suspicious transactions, among others).
- **Identified risks or external events:** Types of detected or documents of warning signs in business activity published by entities such as the UIAF, Asobancaria, to mention a few.

In order to obtain the residual risk of the Organization, an evaluation of the controls associated with each inherent risk is made, which includes:

a. Control Design

The design of the control is an assessment of how effective, efficient, timely and relevant the measure can be, considering the mitigation effect, its implementation costs and its objectives.

The rating or assessment of the control will result from combining the risk mitigation effect and the coverage that is achieved, according to the desired objectives.

b. Maximum control coverage

The maximum coverage of the control corresponds to a quantitative, qualitative or mixed scale that allows a mitigation measure to be established. It is very difficult for a measure to mitigate a risk 100%, but it could be very close if adequate coverage is achieved with a proportional implementation cost.

c. Control Effect

For risks, the control or measure implemented directly mitigates the impact or probability or both at the same time.

d. Existence of control

The control implemented can be an action, mechanism or tool that contributes to the prevention of risk or to the reduction of the effects (probability and impact) of risk.

Sometimes the same control or measure serves to mitigate more than one risk. In any case, controls must lead to reducing risks and must be sufficient, understandable, effective, cost-effective and timely.


e. Control Description

The main controls implemented in The Organization are:

Verification in databases, data verification, request for information, telephone confirmation, report of risk situations, special annotations in a logbook, application of the sanctioning regime, inclusion and application of contractual clauses, among others.

f. Control classification. Control can be classified into:

- **Preventive Control:** Action that is implemented to prevent deviations or non-compliance with a process. It establishes the necessary conditions so that the error or malicious intent does not occur. It is executed before starting a critical process or step. Preventive controls are typically the most cost-efficient.
- **Detective Control:** Action implemented to identify deviations during the execution of a process or its non-compliance. The effectiveness of this type of control will depend mainly on the time

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interval between the execution of the process and the execution of the control. It identifies the error, but does not prevent it, it acts as an alarm that allows the problem and its causes to be recorded. It is used to verify the operation of processes and their preventive controls.

- **Corrective Control:** Action implemented in order to correct the deviations identified once the process has been concluded or its non-compliance. It allows to investigate and rectify errors and their causes, it is intended to ensure that the necessary actions for their solution are taken.

g. Control documentation

Procedures, booklets, guides, records, inspections, visits, staff training, policy implementation, definition of standards, optimization of processes and procedures, implementation of technological controls, reforms of contractual clauses, execution of insurance contracts, are adequately documented.

h. Nature of control (semi-automatic or automatic)

The different controls established by The Organization can be manual, semi-automatic or automatic.

i. Effectiveness of control

Once this evaluation has been carried out, the following is obtained:

- The coverage of the risk that is achieved with control in percentage terms.
- Risk hedging at scale.
- The failure to cover the risk with control.

This will help to determine the final risk assessment taking into account the effect of the controls (Residual Risk), and the level of exposure to risk may be established with respect to the rating given to it in the measurement stage.

Once the residual risk is obtained, the risk area in which they are located is graphically determined, in order to clearly establish the treatment that will be given to each of them.

12. INDICATORS

Name	Formula	Goal	Unit of Measure	Source of information for calculation	Periodicity
Business Ethical Climate	Average Survey Result	>=80	%	Business Ethical Climate Survey	Annual

13. DUTY OF CONFIDENTIALITY

All information derived from the application of this policy is subject to confidentiality, which means that it can only be known by the competent judicial or administrative authorities. Thus, all employees of the Company have the obligation to safeguard and limit the use of the same to the purposes strictly established in the Law and in this policy, among which is to meet the information requirements of the UIAF, competent authorities or control entities.



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14. CHANGE CONTROL

VERSION	REASON	RESPONSIBLE	DATE
01	Document creation	Management and Business Ethics Director	30/05/2025
02	<ul style="list-style-type: none"> • Update of the document covering the scope of Circular 20251000000035CS of September 16, 2026 of the Superintendence of Surveillance of Colombia: by which the guidelines on the Transparency and Business Ethics Program - PTEE" of the surveillance and private security services are dictated. • Definitions of bribery, facilitation payments, and fraud were added. • It was added in the policy: that the organization does not accept bribes from national or foreign public officials or officials of international public organizations, bribery between private companies or the embezzlement of funds in the private sector, it does not accept influence peddling or abuse of functions and illicit enrichment. • Include the procedure for identifying, reporting, evaluating, and managing potential or actual conflicts of interest. • Controls for the prevention of Conflict of interest were added for the involvement of national or foreign Politically Exposed Persons and public officials. • It was added that all political contributions must go through the due diligence procedure and control of conflict of interest. j. Policy of Donations and Political Contributions it was added that it applies to both the public and private sectors, that the requirements for the creation of the third party are met according to the procedure of Creation and 	Compliance Officer	04/03/2026



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	<p>Update of Suppliers, performance of due diligence for the real and exhaustive knowledge of the beneficiary counterparty, according to the Manual for the prevention of money laundering MGD-001 and be aligned with the Social Responsibility Program and comply with all the provisions in our Code of Ethics and Business Commitment.</p> <ul style="list-style-type: none"> • The responsibilities of the Highest Body or Board of Directors, Legal Representative, compliance officer and fiscal auditor were updated and those of the Internal Audit were added according to the new Circular. • The requirements that must be met by the principal and alternate compliance officer to be assigned to the position were added. • The complaints channel for the Superintendence of Surveillance was added. • Item 8.7 on accounting integrity was added. • Point 8.8 on Transparency in Business Management was added to the circular. • The type of complaints that can be received on the ethics line was added in greater detail, including conduct and/or acts related to the possible materialization of the risks associated with criminal activities; conduct and/or acts related to violation of the human rights enshrined in the Political Constitution of Colombia, or conduct and/or acts related to harassment, abuse, and attacks, labor, sexual or discrimination. • Steps were added to guarantee the effectiveness of the reporting channel to manage appropriately, guaranteeing anonymity in the complaint and above all the guarantee that no retaliation will 		
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	<p>be taken against the whistleblower; Contact must be maintained with the complainant and establish the way through which the respective complaint will be handled, request additional information or clarification if required, and give a final response to the actions or decisions.</p> <ul style="list-style-type: none">• The reporting channel of the Secretariat of Transparency of the Presidency of the Republic was added to the acts that they detect associated with corruption or bribery risks in the following channel: https://portal.paco.gov.co/index.php?pagina-denuncie		
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