



POLICY TRANSPARENCY AND CORPORATE ETHICS PROGRAM

Assigned Code
JUR-MN-02

Responsible
Department:
Legal and Corporate
Affairs

Version
3.0

OBJECTIVE

Define the principles of **LEVAPAN S.A.** (hereinafter **THE COMPANY**) to identify, detect, prevent, manage, and mitigate the risks of transnational bribery and corruption, in accordance with its organizational culture, corporate values, and compliance with current regulations.

The accomplish of this policy extends to the operations carried out by other companies of the Levapan Group in Colombia and abroad.

GUIDELINES

1. INTRODUCTION

In the struggle against the scourges of national and transnational bribery in Colombia, Laws, 1474 of 2011, 1778 of 2016, and 2195 of 2022 were enacted. In compliance with these laws, the Superintendency of Companies issued the External Circular 100-000011 of 2022. Additionally, there have been binding international pronouncements for Colombia, such as the Inter-American Convention against Corruption of the Organization of American States of 1997, the United Nations Convention against Corruption (UNCAC) of 2005, and the 2012 Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the Organization for Economic Cooperation and Development (OECD).

THE COMPANY is committed to social responsibility and regulatory compliance, understanding the current regulations on the matter and as a result of a risk assessment, it issues its Transparency and Corporate Ethics Program, which comprises a Policy and a Manual describing the processes adopted by **THE COMPANY** in order to comply with its Policy.

2. SCOPE

This Policy applies to all employees, clients, suppliers, shareholders, contractors, subcontractors, and other third parties, whether natural or legal persons, public or private, with whom **THE COMPANY** establishes any direct or indirect commercial and contractual relationship. The Transparency and Corporate Ethics Program has the fundamental objective of minimize the possibility of materialization of situations associated with the risks of transnational bribery and corruption in national and international business transactions that could lead to deceit, breach of trust, and generally, damage to the reputation of the company, its assets, and its stakeholders.

3. PURPOSE

The Board of Directors and Senior Management of the company express their responsibility to promote among Employees, Shareholders, Customers, Suppliers, Contractors, Strategic Allies and Third Parties that interact with the company, the highest ethical conduct.

This Policy establishes **THE COMPANY'S** commitment to not tolerate conduct considered as transnational bribery or corruption, reinforcing the values, standards and principles established in the Code of Ethics and Business Conduct where the obligation to always act in an honest and ethical manner is established in all our activities, as well as compliance with all current and future regulations governing these issues.

With the implementation of this Policy, we seek to achieve the following specific objectives:

- Generate added value for the company within its compliance program by implementing good commercial practices.
- Prevent damage to the company's image and reputation by adopting and complying with provisions that prohibit any form of transnational bribery and corruption.
- Establish the company's guidelines to identify, measure, control, monitor, detect, investigate, and correct situations of transnational bribery and corruption that may occur within **THE COMPANY** both domestically and internationally, promoting a culture of compliance, safeguarding the company's reputation, and upholding the values enshrined in the Ethics Code and Business Conduct.
- Establish guidelines to ensure that all actions performed on behalf of **THE COMPANY** in the development of international trade operations they are framed within ethical principles and comply with all relevant regulations.

These guidelines are designed to serve as a guide for the conduct of all persons who have business relationships with **THE COMPANY**, including Employees, Shareholders, Suppliers, Contractors, Strategic Allies, Clients, and other Third Parties, in compliance with the standards for the prevention and control of the risk of transnational bribery and corruption adopted by the company.

THE COMPANY'S Transparency and Corporate Ethics Program to combat transnational bribery and corruption, includes, among other elements, the Compliance Officer and the Internal Control System: the Ethics Code and Business Conduct, and the Self-Control and Integral Risk Management System for Money Laundering, Terrorism Financing, and Financing the Proliferation of Weapons of Mass Destruction (SAGRILAF).

4. GENERAL GUIDELINES

THE COMPANY has established the following mandatory conduct rules for all its counterparts as a general guideline for its Transparency and Corporate Ethics Program:

- It strictly prohibits Members of the Assembly, Board Members, Shareholders, Employees, Clients, Suppliers, Contractors, Strategic Allies, and related Third Parties from making or accepting facilitation payments. These are understood as payments made or received to secure or expedite a routine conduct or any actions necessary for the counterparty to have a legal or other type of right.
- Avoid links with counterparts that have been convicted of criminal activities related to transnational bribery and corruption at national and international levels.
- It prohibits bribery of public or private officials, national or foreign, either directly, through third parties, or intermediaries, in exchange for an improper benefit or advantage for themselves or for the company.
- It has a sanction regime in place for serious violations by workers of contractual or regulatory obligations.
- It promotes a culture of ethics and zero tolerance towards corruption and transnational bribery as a key element for the prevention, detection, management, and investigation of Corruption and Transnational Bribery within the company.
- Always acts correctly, ethically, and legally, with honesty and integrity, safeguarding the assets, resources, and information for which they are responsible in the performance of their duties within the company.
- Maintain all internal processes documented, especially those involving interactions with public employees and any international business or transactions.
- Reject any act of corruption and transnational bribery proposed or suggested to any counterparty of the company in relation to the development of the corporate social purpose.
- Report, through the ethics line, acts of corruption and/or transnational bribery of which it becomes aware.
- Follow the due diligence and counterparty knowledge procedures, as applicable, in accordance with the requirements and demands of Colombian law, to identify and assess the risks of corruption and transnational bribery in the development of the company's social purpose.

5. PRINCIPLES

The fulfilment of this Policy is guided by the following principles aimed at preventing, detecting, and correcting situations that have the potential to become violations of current regulations:

Commitment: This Policy is issued by **THE COMPANY'S** Board of Directors to promote a culture of transparency and integrity where transnational bribery and corruption, in general, are considered unacceptable. Senior Management and Associates of THE COMPANY are committed to setting an example for lower-level employees to collectively build a culture aimed at preventing transnational bribery and other corrupt practices, and overall, compliance with the law.

Risk Assessment: The company will manage and mitigate the risks of transnational bribery and corruption through an effective and timely process of segmentation, identification, assessment, monitoring, and implementation of anti-bribery and anti-corruption controls in national and international business and transactions.

Integrity: The Transparency and Corporate Ethics Program is a systematic integration of various documents within the company aimed at establishing good commercial practices based on ethics and compliance. These documents are not scattered but are part of a mechanism that builds the compliance culture in **THE COMPANY** every day. Responsibilities assigned under this Program will be formalized in writing.

Functionality: Given the importance of the Transparency and Corporate Ethics Program for **THE COMPANY**, a Compliance Officer will be appointed. This person will be qualified, experienced, and a leader in managing risks related to acts of corruption or transnational bribery. They will have the autonomy and the human, technological, and economic resources required to implement the Transparency and Corporate Ethics Program.

Due Diligence: Due diligence will be used to provide **THE COMPANY** with the necessary elements to identify and assess the risks of transnational bribery and/or corruption inherent in the activities it develops.

Control and Supervision: The company will establish responsibilities to ensure proper monitoring and periodic reviews to ensure the effectiveness of procedures established to prevent Transnational Bribery and other corrupt practices.

Disclosure: **THE COMPANY** is committed to providing all necessary means to communicate and organize periodic training sessions for: Board Members, administrative personnel, and any employee considered to be exposed to the risk of transnational bribery and corruption, their role in international trade, and participation in training programs on the prevention and control of transnational bribery and corruption risks.

Communication Channels: The Compliance Officer is responsible for receiving inquiries, complaints, and reports of possible violations of this Policy and/or current regulations. **THE COMPANY** has an Ethics Line, through which anyone with any relationship with **THE COMPANY** can safely, confidentially, and anonymously inform **THE COMPANY** of any suspected violation of this Policy. All reports made to the company's Ethics Line will be handled according to the protocols established by the Ethics Committee. The Ethics Line may be managed by an external party, but they must always inform the Compliance Officer of any report or complaint received. There will be no retaliation against Employees who, in good faith, report acts or potential acts of violation of this Policy and/or current regulations.

Confidentiality: All information derived from the application of this Policy is confidential and may be transferred to and known by the competent judicial or administrative authorities when required. Members of the Assembly, Board Members, Employees, Clients, Suppliers, Contractors, Strategic Allies, and Third Parties related to the company are obligated to maintain absolute confidentiality regarding the information generated and distributed in connection with this Policy, especially that which has been internally reported or made available to the competent authorities.

6. COMPLIANCE

THE COMPANY considers a serious offense, the omission or breach of any of the guidelines, controls, information management or other guidelines found in its Transparency Program and Business Ethics. .

Likewise, it must report to the competent authorities and exercise legal actions when required, for any deviation that is identified..

7. DOCUMENT CONSERVATION

All documents used for the development of the Transparency and Business Ethics Program of THE COMPANY shall be kept in physical files for a term of ten (10) years and once this term expires may be destroyed as long as their reproduction in magnetic media is guaranteed.

On the other hand, the documentation related to the due diligence processes oriented to the knowledge of the counterparties shall be kept during the entire time the respective commercial or contractual relationship lasts. Once the relationship is terminated, the company shall house it for at least the following five (05) years, counted as of January 1st of the following year in which such relationship is terminated.

RELATED POLICIES AND PROCEDURES

The following procedures must be applied to ensure the fulfilment this policy and its controls:

CORP-JUR-MN-02 Manual of the Transparency and Corporate Ethics Program

GLOSSARY

Risk Control	The part of risk management that involves implementing policies, standards, procedures, and physical changes to eliminate or minimize adverse risks.
Corruption	Abuse of positions of power or trust for personal gain at the expense of the collective interest, carried out by offering, promising, soliciting, delivering, accepting, or receiving (or any attempt to engage in these behaviors) money, goods, or any other thing of value in exchange for actions, decisions, or omissions. It can occur in both the public sector, it is, with respect to a Public Employee, or in the private sector.
Due Diligence	A continuous and periodic review and evaluation process that must be carried out by the Obligated Entity in accordance with the Corruption Risks or Transnational Bribery Risks to which it is exposed.
Employee/Public Official	As defined in the First Paragraph of Article 2 of 1778 Law: "Any person holding a legislative, administrative, or judicial position in a State, its political subdivisions, or local authorities, or a foreign jurisdiction, regardless of whether the individual was appointed or elected. A foreign public official is also considered any person exercising a public function for a State, its political subdivisions, or local authorities, or in a foreign jurisdiction, either within a public body, a state-owned enterprise, or an entity whose decision-making power is subject to the will of the State, its political subdivisions, or local authorities, or a foreign jurisdiction. Any official or agent of an international public organization is also considered to hold the referred status."
Risk Factors	Agents that generate the risk of transnational bribery and corruption, such as customers/users, products, country, economic sector, distribution channels, and jurisdictions. .

Risk Identification	The process of determining what can happen, why, and how.
OECD	Acronym for the Organization for Economic Cooperation and Development.
Compliance Officer	An employee of the company appointed by its Board of Directors as the leader of the SARSC, responsible for ensuring, with the support of other areas, that all provisions contained in the Policy and Manual are adopted, reporting compliance to the Board of Directors, and addressing requirements from oversight and control entities
UN	United Nations Organization.
Risk Management Process	Systematic application of management policies, procedures, and practices to the tasks of establishing the context, identifying, analyzing, evaluating, treating, monitoring, and communicating risks.
Product	Legally authorized operations that the supervised companies can carry out through the conclusion of a contract.
Transparency and Corporate Ethics Program	A framework of documents and processes within the company designed to regulate the company's internal guidelines and procedures to combat Transnational Bribery and Corruption, in compliance with applicable regulations.
Reputational Risk	The possibility of loss incurred by a company due to disrepute, poor image, negative publicity, whether true or not, concerning the institution and its business practices, resulting in customer loss, revenue decline, or legal proceedings
Risk	The possibility of an event occurring that will impact objectives. It is measured in terms of consequences and probabilities.
Associated Risks	Risks through which Transnational Bribery and Corruption Risks materialize, such as reputational, legal, operational, and contagion risks.
Services	All interactions of the companies with persons other than their clients.
Bribery	Offering or promising money or other benefits to a witness to induce false testimony or to withhold information partially or entirely.
Transnational Bribery	The conduct of giving, offering, or promising to a foreign Public Official, directly or indirectly: (i) sums of money; (ii) objects of pecuniary value; and/or (iii) any benefit or advantage in exchange for the Public Official to perform, omit, or delay any act related to their functions in connection with an international business or transaction. It is a crime established in Article 433 of the Colombian Penal Code and also leads to a sanction against the legal entity whose employees, administrators, associates, or contractors engage in this conduct.
Associated Third Party	Any entity providing services to the company or acting on its behalf, regardless of the contractual relationship. Examples include agents, suppliers, subsidiaries, outsourcing, strategic allies, among others. It equates to the term "Associated Persons" as defined in the UK Bribery Act.