

POLICIES, GUIDELINES AND PROCEDURES

TRANSPARENCY POLICY

SEMPERTEX GROUP business management is based on the values of integrity, passion, collaboration, quality, and transformation. Under this fundamental premise, the company's Board of Directors and Presidency promote the utmost rigor in all their behaviors inspired by the highest ethical standards in its work team, customers, suppliers, and any other business partner. The Code of Ethics and Conduct, as well as this anti-bribery policy, are the tools that must serve as a guide for all actions and behaviors of the human team at SEMPERTEX GROUP. In accordance with the foregoing, every person associated with SEMPERTEX GROUP in any capacity bears joint responsibility for the adequate and correct implementation of the anti-bribery policy and procedures in the governance and corporate compliance system.

SEMPERTEX GROUP recognizes the enormous responsibility that its actions bear in terms of ethics, transparency, and bribery. SEMPERTEX GROUP complies with the policies and legislation of the Colombian state or the countries where we have operations, employing the necessary resources and commitment to achieve total transparency of operations in the countries where it has a presence with its products and/or business relationships.

SEMPERTEX GROUP prohibits any act of corruption or unethical behavior that does not reflect the business values established for any of its collaborators and requires adherence to all anti-corruption and anti-bribery rules, including External Circular Letter 100-000003 of 2016 and those that modify or repeal it, of the Superintendence of Corporations.

SEMPERTEX GROUP encourages good practices and implements procedures, protocols, control mechanisms, continuous improvement, and reporting, among other things, to ensure the prevention, identification, and treatment of acts and behaviors that are considered illegal due to a lack of legitimacy and transparency, while also protecting and anonymizing whistleblowers. Employees who have the authority to conduct national or international negotiations must perform due diligence to adequately know the third parties, and in particular, the link with government entities or public servants, before closing any purchase or negotiation.

SEMPERTEX GROUP has an anti-bribery compliance officer and a compliance committee that are mechanisms to ensure the proper functioning of the system and accountability to the board of directors.

Any SEMPERTEX GROUP collaborator and/or administrator who is found to have violated or infringed this policy, after complying with the disciplinary process established by the company, and respecting due process and the right to defense, will be subject to the pertinent disciplinary measures. The acts used with the risk of bribery will receive administrative and legal responses in accordance with the provisions of the applicable regulations.

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ANTI-TRANSPARENCY AND BUSINESS ETHICS MODALITIES

BRIBERY

Bribery is the act of giving, offering, promising, requesting or receiving anything of value in exchange for an undue advantage or benefit, or as consideration in exchange for performing, or not performing, an act inherent to a public or private function. Bribery can take place in the public sector or in the private sector. Bribes and kickbacks may therefore include, but are not limited to: - Excessive or inappropriate gifts and entertainment, hospitality, travel and accommodation expenses. - Payments, whether from collaborators or business partners, such as agents, facilitators or consultants. - Other "favors" provided to public officials or servants, customers or suppliers, such as contracting with a company owned by a family member of the public official, customer or supplier.

In this case, SEMPERTEX GROUP collaborators must strongly reject bribery and report any situation via the channels provided, such as the transparency mailbox, or to the Compliance Officer of the Business Ethics and Transparency program.

CORRUPTION

This is any act, attempt or deliberate omission to obtain a benefit for oneself or for third parties to the detriment of organizational principles, regardless of the financial effects on the company. These are actions that occur in one of two ways:

Internal: acceptance of bribes from third parties to SEMPERTEX GROUP collaborators, so that their decisions, actions or omissions benefit that third party.

Corporate: payment of bribes by SEMPERTEX GROUP collaborators to government officials (domestic or foreign) or third parties, directly or through agents, so that the decisions of the third party, their actions or omissions benefit the Company or its officer.

In this situation, SEMPERTEX GROUP collaborators must reject any act of corruption in a forceful manner and report this situation through the channels provided, such as the transparency line or inform the Compliance Officer of the Business Ethics and Transparency program.

GUIDELINES FOR INTERACTION WITH THIRD PARTIES

DELIVERY OF REMUNERATION OR COMMISSION PAYMENTS

SEMPERTEX GROUP does not allow its business partners, mainly collaborators, to engage in

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any practice that seeks to grant, directly or through the use of an intermediary, commissions or gratuities or any other type of gift to public officials or any other third party, whether national or foreign.

SEMPERTEX GROUP does not admit the payment of remuneration to fictitious collaborators or any other type of collaborators who do not render a real service to the organization.

PAYMENTS FOR ENTERTAINMENT, FOOD, TRAVEL AND/OR GIFT EXPENSES.

Employees, contractors, or third parties with whom they have a business relationship are not permitted to solicit, accept, offer, or provide gifts, entertainment, hospitality, travel, or sponsorships for the purpose of inducing, supporting, or rewarding improper behavior in connection with the acquisition of any business involving SEMPERTEX GROUP. Gifts, entertainment expenses, and other courtesies for an official and/or public servant are not permitted.

POLITICAL CONTRIBUTIONS

SEMPERTEX GROUP does not make contributions to political parties, public servants or organizations that are sanctioned or disqualified by the control entities, are part of restrictive lists with information on money laundering, financing of terrorism or other crimes.

All contributions made by the company must have a lawful purpose and must be previously approved by the board of directors.

Contributions are made transparently and in good faith, seeking to ensure that:

- (a) the recipients are legitimate and the final destination of the contribution is equally legitimate.
- (b) the contribution is made within the framework of the law;
- (c) it is not made in consideration for favors or decision making to exclusively benefit SEMPERTEX GROUP.
- (d) the Company records the contribution in its accounting records.

SEMPERTEX GROUP respects the right of collaborators to participate in political activities that they freely choose to carry out, as long as such activities do not interfere with the fulfillment of duties and responsibilities, and are carried out strictly on a personal basis.

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During the exercise of any political activity, do not involve or refer to SEMPERTEX GROUP, do not use the name, symbols, logos or any other sign that may be employed by the company.

FORMER PUBLIC SERVANTS

SEMPERTEX GROUP may hire former public servants, however, in no case may this collaborator make use of confidential information of the company or of the governmental entity with which he/she was linked to carry out influence peddling in favor of SEMPERTEX GROUP.

DONATIONS AND SPONSORSHIPS

All donations made by SEMPERTEX GROUP must have a lawful purpose and must be made following the procedures defined for this purpose.

The company may make donations and subscribe sponsorships to support projects proposed by public or private entities, or by non-profit organizations, duly established in compliance with the law, that promote values consistent with those contained in this Program.

All contributions and sponsorships will be in accordance with internal procedures and must be transparent, traceable, verifiable, and adequately justified. All such contributions and sponsorships shall require the approval of the Company's President.

DUE DILIGENCE GUIDELINES

The Due Diligence is oriented to provide SEMPERTEX GROUP with the necessary elements to identify and evaluate the Corruption and Transnational Bribery Risks related to the company's activities.

The due diligence processes will be supervised by the compliance officer and integrated with the due diligence of system of self-monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction and will be carried out for the first time prior to the linking of the business partner with SEMPERTEX GROUP. Subsequently, due diligence will be carried out annually.

In general, Due Diligence has the following characteristics mentioned below:

- Be oriented to the identification and evaluation of Corruption and Transnational Bribery Risks, which shall include in particular the adequate review of the specific qualities of each business partner, its reputation, relationships with third parties.
- To leave a written record of the same in such a way that it can be easily accessed and understood by the Compliance Officer.

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- To provide elements of judgment to rule out that the payment of a very high remuneration to a third party hides indirect payments of bribes to National or Foreign Public Servants or that it corresponds to the higher value that is recognized to a third party for its intermediation work.
- To provide information to the Compliance Officer about the reputation of those third parties that have a high degree of exposure to Corruption and Transnational Bribery Risk.
- To be carried out by collaborators who are capable of carrying out these tasks. They must have the human and technological resources to gather information about the commercial, reputational, and sanctioning background in administrative, criminal, or disciplinary matters that have affected, are affecting, or may affect the individuals subject to Due Diligence.
- Contractors and potential Contractors, as well as individuals providing services to Contractors under any contractual modality, are subject to due diligence if they are relevant to a commercial business involving SEMPERTEX GROUP.

WARNING SIGNS

SEMPERTEX GROUP will define its warning signals based on the identified Corruption and Transnational Bribery Risks as well as those suggested in External Circular Letter 100-0000011 dated August 9, 2021. The area leaders will evaluate these warning signs on a monthly basis using the Unusual Operations Summary Form F02-PAD-02. A red flag can also be reported to the compliance officer via email at cumplimiento@sempertex.com.

CUSTODY AND PRESERVATION OF DOCUMENTS RELATED TO INTERNATIONAL TRANSACTIONS

Documents related to national or international business or transactions must be filed and reserved in accordance with SEMPERTEX GROUP's document management program.

REPORTING CHANNELS

TRANSPARENCY MAILBOX

SEMPERTEX GROUP has a Transparency Mailbox on its website for reporting conduct that is in any of the modalities of bribery or corruption, while guaranteeing the confidentiality of the information and the non-retaliation to the informant who may be subject as a result of the decision that he/she adopts in the sense of not becoming involved in acts of corruption.

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	TRANSPARENCY AND BUSINESS ETHICS POLICIES	
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The following are the main features of the transparency mailbox:

- The Transparency mailbox differs from other customer service channels.
- It is not a tool for reporting complaints or claims, but rather for reporting conduct that violates the Company's Transparency and Integrity.
- It is not for suggestions, nor is it for focusing on labor or personal issues.
- It must be used with caution. The information provided must be accurate and verifiable.

Furthermore, any officer or business collaborator can communicate directly with the organization's compliance officer via the mailbox cumplimiento@sempertex.com.

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