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1. PRESENTATION

BBI Colombia S.A.S. (hereinafter "The Organization" or "BBI Colombia") considers integrity to be a fundamental pillar for achieving excellence, generating sustainable value, and building lasting relationships of trust.

consistent with our organizational culture and corporate values, The Organization has adopted a Transparency and Business Ethics Program (PTEE), from which the Anti-Corruption and Anti-Bribery Policy is derived.

This policy, in alignment with the values of the Colpatria Business Group—to which The Organization belongs—reaffirms its commitment to compliance, transparency, and the responsible development of its activities under the highest ethical standards, for the benefit of all its counterparties and the environment in which it operates.

2. OBJECTIVE

The Board of Directors of BBI Colombia assumes with full conviction its responsibility to inspire and promote, together with all related counterparties, ethical conduct based on the highest standards of integrity.

Through this Anti-Corruption and Anti-Bribery Policy, BBI Colombia reaffirms its unwavering commitment to zero tolerance regarding any form of corruption or transnational bribery. This commitment reflects not only rigorous compliance with the law but also the firm decision to always act with honesty, transparency, and respect for its corporate values.

The Organization believes that doing the right thing is the foundation for building a sustainable, reliable, and fair environment for all. With the implementation of this Policy, The Organization seeks to achieve the following objectives:

Strengthen its corporate culture based on ethics, promoting consistency between what is said and what is done, as a genuine reflection of its values and principles.

Protect its image and reputation, preventing any form of corruption or transnational bribery through the adoption of clear, firm, and preventive measures that express its zero-tolerance stance against these behaviors.



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Define clear guidelines to act in the face of corruption and bribery risks, allowing for their identification, measurement, management, and correction in a timely manner, within an environment of continuous improvement and commitment to compliance.

All of the above is aimed at preserving the trust of its counterparties and contributing to an upright and sustainable business environment. These guidelines are designed to serve as a guide for the conduct of all counterparties having business relationships with The Organization, ensuring compliance with the standards for the prevention and control of corruption and transnational bribery risks adopted by BBI Colombia.

BBI Colombia's strategy for the fight against corruption and transnational bribery contemplates, among other elements and related systems, the Transparency and Business Ethics Program (PTEE), the Internal Control System, and the Self-Control and Integral Risk Management System for ML/TF/FPADM (SAGRILAFT).

3. SCOPE

This Policy applies to BBI Colombia and, in general, to all counterparties with whom The Organization establishes any direct or indirect commercial, contractual, or business relationship.

The fundamental objective of BBI Colombia's PTEE is to minimize the possibility of situations associated with corruption and transnational bribery risks materializing in national and international businesses and transactions that could generate deceit, breach of trust, and generally, damage to its reputation, assets, and stakeholders.

In accordance with this Policy, BBI Colombia and its counterparties shall refrain from participating in any corruption practice or form of bribery, whether directly or indirectly.

4. PRINCIPLES

BBI Colombia believes that acting with integrity is a shared responsibility and a commitment to the present and the future. The following principles guide the implementation of this Policy and reflect the will to build an ethical and sustainable culture in all relationships:

Principle 1 – Proportionality: Actions must be as robust as they are pertinent. Therefore, measures to prevent corruption and bribery risks have been designed proportionally, considering the size, nature, economic activities, and particularities of the business.



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Principle 2 – Shared Commitment: BBI Colombia understands that building an ethical and transparent environment requires the active commitment of everyone. Therefore, it commits its counterparties to know, respect, and apply the guidelines established in the Manual of the Transparency and Business Ethics Program (PTEE) and to always act consistently with them.

Principle 3 – Risk-Based Management: Conscious of the challenges faced in the business environment, The Organization assumes a preventive stance to identify, assess, monitor, and implement controls that allow for the mitigation of corruption and transnational bribery risks with rigor and timeliness, strengthening its processes and decisions based on effective risk management.

Principle 4 – Due Diligence: Every relationship counts. Therefore, all interactions with counterparties are governed by the principles of the PTEE, including a systematic process of third-party knowledge (KYC/KYT) that guarantees transparency, trust, and permanent updating.

Principle 5 – Communication and Training: Knowledge is fundamental for making integrous decisions. The Organization is committed to providing the necessary resources for its collaborators to fully understand the risks associated with corruption and bribery through clear and accessible communication channels and periodic training programs.

Principle 6 – Monitoring and Continuous Improvement: Ethics is managed day by day. BBI Colombia establishes clear responsibilities to monitor and periodically review its Program, ensuring its correct implementation, effectiveness, and constant evolution in the face of new realities, learnings, and challenges.

5. DEFINITIONS

The following are the terms or abbreviations most used in this Anti-Bribery and Anti-Corruption Policy with their definitions, for knowledge, understanding, and application:

Counterparties: Natural or legal persons with whom BBI Colombia has business, contractual, or legal ties of any order. Among others, counterparties include Collaborators, Shareholders, Members of corporate governance bodies, Business Partners, Suppliers, Clients, and Allies.

Corruption: All conduct aimed at a company benefiting, seeking a benefit or interest, or being used as a means in the commission of crimes against public administration or public assets, or in the commission of Transnational Bribery conduct. Acts of corruption are understood as the criminal behaviors listed in the chapters of crimes against public administration, the environment, the economic and social order, financing of terrorism and



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organized crime groups, administration of resources related to terrorist activities and organized crime in the Colombian Penal Code, those established in Laws 1474 of 2011 and 2195 of 2022, electoral crimes, or any punishable conduct related to public assets.

Transnational Bribery: According to Article 19 of Law 2195 of 2022, this crime is committed by legal entities that, through one or several: (i) employees, (ii) contractors, (iii) administrators, or (iv) associates, whether their own or of any subordinate legal entity, give, offer, or promise to a foreign public servant, directly or indirectly: (i) sums of money, (ii) any object of pecuniary value, or (iii) other benefit or utility, in exchange for the foreign public servant performing, omitting, or delaying any act related to the exercise of their functions and in relation to international business or transactions.

Bribery: According to the Anti-Bribery and Anti-Corruption Policy, it is the act of offering, promising, or giving any value in cash or in kind (Gifts and hospitality, products, and services) to obtain or achieve an inappropriate benefit or advantage for oneself or a third party.

6. GENERAL GUIDELINES

BBI Colombia is convinced that building relationships based on ethics, legality, and transparency is essential to achieving a sustainable impact. Therefore, it shares these guidelines with its counterparties, reflecting its commitment to the prevention of corruption and transnational bribery, which must be complied with in all commercial, contractual, or business relationships with The Organization.

1. BBI Colombia categorically rejects any act of corruption or transnational bribery, regardless of its form or typology. This principle is non-negotiable in all its operations.
2. Any act of bribery is strictly prohibited at BBI Colombia, without exception. This includes payments, benefits, or undue offers to public or private officials, whether national or foreign, both directly or through third parties or intermediaries. This prohibition is absolute and reflects our commitment to legality, integrity, and transparency in all our relationships.
3. BBI Colombia conducts its operations with the highest ethical standards and in strict compliance with applicable legislation; therefore, it expects its counterparties to join in this commitment.



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4. BBI Colombia promotes an anti-corruption and anti-bribery culture that must permeate all levels: administrators, executives, collaborators, suppliers, allies, and other related third parties.
5. The responsible growth of The Organization requires acting with consistency and transparency. Therefore, clear rules have been established to prevent conflicts of interest and practices that may jeopardize its reputation, including the regulation of gifts, invitations, and hospitality. These provisions, integrated into the PTEE Manual, reflect BBI Colombia's commitment to an ethical culture, the trust of its allies, and long-term sustainability.
6. BBI Colombia's leaders bear the responsibility of ensuring that all collaborators know and understand the standards, procedures, and controls established to prevent and manage the risk of corruption and transnational bribery.
7. The Organization maintains internal policies, procedures, and standards regulating local and international contracts, operations, and transactions, which must be of mandatory compliance for all involved parties.
8. BBI Colombia has guidelines and methodologies to identify, measure, and monitor corruption and transnational bribery risks and expects its counterparties to implement similar actions in their processes.
9. BBI Colombia periodically reviews and updates the risks and controls contemplated in its PTEE to ensure their effectiveness in the face of changing environments, new threats, and regulatory requirements. This continuous review process strengthens The Organization's prevention, detection, and response capabilities, serving as a key tool to protect its operation, reputation, and sustainability against potential acts of corruption or transnational bribery.
10. BBI Colombia promotes awareness among its counterparties regarding best practices for preventing and managing corruption and transnational bribery risks. To this end, it utilizes resources, strategies, and dissemination and training programs that strengthen the compliance culture both within The Organization and in its business environment.
11. BBI Colombia establishes demanding requirements for third party engagement and rejects the initiation or renewal of a contractual, commercial, or business relationship that does not meet the requirements required by law and internal regulations.



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- 12.** The engagement of counterparties to The Organization is carried out through clear and transparent processes that allow for the assessment of their suitability, in compliance with internal procedures. Any third party that has contact or negotiations with public officials must know and abide by this policy.
- 13.** BBI Colombia shall not maintain ties with counterparties that have been convicted of criminal activities related to corruption or transnational bribery.
- 14.** BBI Colombia does not perform, directly or indirectly, transactions, operations, or businesses involving virtual assets, cryptocurrencies, or any other digital instrument that does not have legal backing, express regulation, and supervision by competent authorities in Colombia.
- 15.** BBI Colombia does not tolerate its counterparties obtaining commercial, financial, or other results by violating the law or the principles described in this policy.
- 16.** BBI Colombia strictly prohibits Collaborators, Shareholders, Governance Body Members, Business Partners, Suppliers, Clients, Allies, and other related Third Parties from making or accepting facilitation payments. These are understood as payments made or received to secure or expedite the course of routine action or actions necessary for the counterparty to obtain legal or other right.
- 17.** Counterparties must strictly comply with policies on gifts, invitations, and hospitality, ensuring that in no case may these elements be interpreted as attempts to influence business decisions or generate conflicts of interest.
- 18.** BBI Colombia's counterparties are obliged to report, through the channels arranged for this purpose, any situation that may constitute an act of corruption or transnational bribery. The Organization shall process these reports in accordance with its internal policies, guaranteeing confidentiality and due process.
- 19.** BBI Colombia prioritizes prevention, without neglecting the detection and correction of potential irregularities.
- 20.** The Organization maintains control, communication, and reporting mechanisms to prevent, detect, and respond in a timely manner to potential acts of corruption or transnational bribery.



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- 21.** BBI Colombia has arranged confidential and anonymous mechanisms for receiving reports on possible misconduct. These channels are designed to guarantee the protection of the whistleblower and preserve the integrity of the reported information. The data and access to these channels are published on the website <https://nosotros.tostao.com/> - (Ethics Line).
- 22.** BBI Colombia addresses any indication or report related to corruption or transnational bribery with total seriousness. All reported situations will be handled in a timely and rigorous manner under the principles of confidentiality, integrity, transparency, objectivity, and respect. Reports will be assessed regardless of their amount or the role of the individuals involved, as part of the duty to act responsibly, protect The Organization's credibility, and strengthen the compliance culture.
- 23.** Every indication of irregularity will be evaluated with confidentiality, transparency, and objectivity, respecting the rights of those who report or participate in the processes.
- 24.** No one will be subject to retaliation for rejecting or reporting an improper practice. BBI Colombia values ethical leadership.
- 25.** BBI Colombia will not make donations or contributions for democratic purposes to political parties or movements, significant groups of citizens, and other organizations with similar purposes.
- 26.** BBI Colombia will not make sponsorships of any kind.
- 27.** BBI Colombia does not conduct, promote, or finance lobbying activities, and prohibits its collaborators, executives, and third parties from managing undue influences before authorities. Any interaction with public entities must be limited to what is strictly necessary for the development of business activity, conducted with transparency, legality, and traceability, and subject to established internal procedures and controls.
- 28.** All information derived from the application of this policy is subject to strict confidentiality. BBI Colombia commits to its counterparties to maintain absolute confidentiality regarding information prepared and distributed in relation to the PTEE especially that which has been reported internally or made available to competent authorities, except upon request by said authorities.

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29. All counterparties of BBI Colombia have the obligation to safeguard information derived from the application of this policy and limit its use to the purposes strictly established by Law, including attending to information requests from the Attorney General's Office (Fiscalía General de la Nación), competent authorities, or control entities.

30. BBI Colombia has a disciplinary regime established in its Internal Work Regulations, which contemplates clear sanctions regarding the violation of contractual or regulatory obligations, including non-compliance with the provisions of the PTEE. Consequences shall be applied according to the severity of the offense.

31. BBI Colombia may report acts of corruption or transnational bribery identified during investigations or preliminary verification tasks to the competent authorities.

7. VERSION AND UPDATE

Updates to the Anti-Corruption and Anti-Bribery Policy and the PTEE shall be approved by the Board of Directors whenever changes occur in BBI Colombia S.A.S.'s operations that alter or may alter the degree of C/TB risk (Corruption/Transnational Bribery), or at least every two (2) years.

Considering that this policy has a special impact on third parties, once approved by the Board of Directors, it will be published on the website. Any modification made to it must have the same level of dissemination.

Approval Date	Version	Description of Adjustments
11/19/2025	3.0	Update of anti-corruption and anti-bribery policy, restructuring of the program through the creation of the Procedures Manual and annexes.
12/12/2024	2.0	The chapter on definitions, guidelines, warning signals, procedures and responsibilities, risk factor administration, and contact was included, and annexes for the implementation of the policy are included.
07/21/2022	1.0	First original version – initial [ES – EN]