



Dear Supplier and Contractor,

Sustainability is at the core of Colombina's strategy. We firmly believe that by managing businesses through transparent, ethical, and responsible practices, we can drive the growth of our country. We recognize that a fundamental part of our commitment to sustainable development lies in the active involvement of our partners, as together, we can achieve our goal of fostering a business fabric in harmony with the environment and generating social, economic, and environmental value.

Therefore, we are sharing with you the relevant sections of our Responsible Conduct Code that impact the relationships with Suppliers and Contractors.

1. RELATIONSHIP WITH SUPPLIERS, CONTRACTORS, THIRD PARTIES, AND GOVERNMENT ENTITIES (RESPONSIBLE CODE OF CONDUCT CHAPTER 9)

At Colombina, we work with suppliers who share our corporate values and contribute to our sustainability management throughout the value chain. We base our relationships on trust and mutual respect, creating long-term partnerships while promoting compliance with the fundamental principles of the Global Compact in its five pillars: Human Rights, Labor Standards, Environment, Anti-Corruption, and Business Ethics.

These principles will be promoted and validated throughout the supply chain through the following guidelines:

Human Rights and Labor Standards:

• **Prohibition of Forced Labor**

We strictly forbid any form of forced labor and physical mistreatment of employees.

• **Prohibition of Child Labor**

We adhere to minimum age provisions, laws, and relevant regulations to ensure the elimination of child labor.

• **Working Hours and Remuneration**

We fully comply with the legislation related to wages, working hours, and benefits, providing employees with opportunities to develop their skills and capabilities.



- **Health and Safety at Work**

We ensure a safe and healthy working environment, minimizing the risk of accidents, injuries, and any other health hazards.

- **Elimination of Discrimination and Harassment**

Our workplaces are kept free from discrimination. The sole basis for hiring, promotion, or training should be performance, skills, and experience.

- **Freedom of Association and Collective Bargaining**

We respect the rights of employees to form or join unions without any fear of reprisal.

- **Communication**

Colombina will promote the replicability of the supplier policy and associated practices within the supply chain, encouraging suppliers to extend these practices to their own network of providers.

- **Development of Suppliers**

We strive for the comprehensive development of our suppliers, aiming for them to meet quality and competitiveness standards. To achieve this, programs such as "Big Brother" and Supplier Certification have been implemented.

- **Extended Sustainability**

We support our suppliers in their commitment to sustainability and encourage them to extend this commitment to their own supply networks.

- **Environmental Care**

Colombina fosters sustainable practices within its value chain, ensuring that suppliers comply with current environmental regulations, promote the efficient use of natural resources, and work towards continuous improvement for global environmental sustainability. Additionally, we encourage suppliers to work on climate change strategies contributing to sustainable development goals.

This includes defining and monitoring carbon footprint indicators, seeking energy efficiency alternatives, and working on pollution prevention through efficient solid waste management aimed at reduction, reuse, and recycling under the circular economy model.

Furthermore, suppliers are encouraged to adopt practices that promote biodiversity conservation, no deforestation, and the preservation of land, consolidating their



commitment to the conservation and balance of ecosystems as a vital foundation for planet conservation.

To ensure coherence and compliance with these initiatives, we have established strong corporate policies that allow us to oversee their implementation and extend the commitment throughout the value chain.

You can find more information about our corporate policies at the following link: https://colombina.com/co_en/sustainability/value-chain

2. BUSINESS ETHICS - ETHICS POLICY (CHAPTER 5 OF RESPONSIBLE CODE OF CONDUCT)

The Business Group expressly declares its unwavering commitment to strictly comply with the legal regulations governing the activities related to its business operations, conducting them in an ethical, transparent, and honest manner.

All employees are obligated to comply with the laws, regulations, and provisions issued by the authorities, as well as the policies and procedures established by the Business Group.

It is the policy of the Business Group to fully cooperate with all authorities. Particularly, all employees must observe transparency and ethical principles in their relationships with customers, contractors, investors, market knowledge, reporting of suspicious operations, preservation of documents, and timely response to the requirements of authorities contained in the regulations on bribery prevention, prevention and control of money laundering, issued respectively by the Superintendence of Companies and Financial Institutions, the National Tax and Customs Directorate (DIAN), and other competent bodies.

• Commercial Integrity

Operate with integrity, respect relevant laws, avoid bribes and fraudulent practices, comply with tax requirements, adhere to legislation against money laundering and other assets, and respect and promote intellectual property.

• Relationship with Third Parties

No transactions for the purchase or sale of products or services shall be conducted with legal entities or individuals engaged in illicit activities, with pending matters with the justice system, or suspected of being involved in illegal activities in any way. No resources of the Business Group shall be used to pay, directly or indirectly, representatives of public, private, or mixed entities to obtain special favors or business. No employee shall give bribes,



payments, or gifts to third parties, regardless of the intent to influence them. In their roles, employees must treat third parties fairly, impartially, and on equal terms.

- **Anti-Competitiveness**

Suppliers must ensure, preserve, and promote fair and equitable competition in all markets and productive sectors, benefiting socio-commercial relationships.

- **Zero Tolerance for Fraud**

Any natural person committing fraud against any of the companies in the Business Group will be reported criminally. Any employee involved in fraud against the Business Group will be dismissed with just cause, without severance payment. A simple warning is not acceptable. In case of fraud, disciplinary decisions, such as temporary or permanent separation from the position, will no longer be the responsibility of the respective Vice President but will fall under the responsibility of the VP of Human Resources.

- **Prevention of Corruption, Money Laundering, and Bribes**

The Business Group will refrain from conducting operations with third parties whose resources come from illegal activities, for which they will adopt due diligence procedures to know their counterparts, following the applicable regulations on prevention, control, and management of money laundering, terrorism financing, and bribery.

The Business Group recommends its companies to carry out at least the following activities:

A. Declaration: Request third parties with whom the Business Group maintains business relationships to sign a declaration stating that:

- They are not subject to sanctions for corruption, money laundering, national or transnational bribery, or any other intentional crime.
- Their resources, including those committed in the corresponding legal relationship, come from lawful activities.
- They have not engaged in transactions or operations related to illegal activities, nor will they contract or have connections with third parties engaged in illegal activities.
- The resources committed in the contract or corresponding legal relationship do not come from any illegal activity.
- They comply with the provisions regarding corruption prevention, money laundering, and terrorism financing applicable to them.



B. Due Diligence: Conduct the necessary due diligence to obtain the full identity of third parties and verify information in public databases or lists, particularly binding lists for Colombia (United Nations Security Council list) and OFAC lists.

C. Early Termination: In case the Business Group verifies that the declarations made by third parties in this chapter are false or inaccurate, the Business Group will seek to terminate the corresponding business relationship, to the extent legally possible, including clauses in contracts or agreements that allow for immediate termination due to such circumstances, without generating recognition or payment of damages. This is subject to the acceptance of the stipulation by the counterpart in the contract or agreement.

Gifts from Third Parties:

The Business Group maintains a relationship of mutual respect with its suppliers and contractors, seeking continuous and stable supply in terms of quality and timeliness, within a balanced negotiation. The following guidelines must be observed regarding the relationship with suppliers:

- Employees are prohibited from requesting or receiving, for themselves, their family members, or third parties, any kind of gratuities, commissions, gifts, invitations, attentions, loans, or favors from suppliers or contractors.
- Employees are prohibited from obtaining benefits for themselves, their families, or third parties derived from this commercial relationship, including gifts or invitations that compromise their independence.
- Employees are prohibited from giving, offering, or promising to pay a public or private national or foreign servant, suppliers, and/or contractors directly or indirectly any sum of money, any object of monetary value, or any other benefit or utility in exchange for the public or private national or foreign servant, suppliers, and/or contractors performing, omitting, or delaying any act related to the exercise of their duties and in relation to a national and/or international business or transaction.

The following are exceptions to gift receipt:

- a) Symbolic gifts, with a maximum value equivalent to US\$30, such as calendars, promotional pens, etc.
- b) Invitations and attentions that do not exceed reasonable amounts, with prior approval from the respective Vice President.



c) Discounts and special rates offered to all employees, such as corporate rates for hotels, airlines, and car rental companies.

The Corporate Supply and Foreign Trade Areas will inform suppliers of goods and services, including contractors, financial entities, consultants, and advisors of any kind, of this prohibition.

If, despite the above, a gift is received that does not comply with the indicated guidelines, it must be handed over to Human Resources, who will use it for internal activities or charitable purposes.

Commercial, technical, and specification information provided by or received from suppliers or contractors must be used exclusively for business purposes and is prohibited from being provided to third parties.

Remuneration to Contractors:

Employees should not contract with third parties if they have reason to suspect that these third parties will pay bribes on behalf of the Business Group. Employees must ensure that no contractor will make, offer, request, or receive inappropriate payments on behalf of the Business Group. All fees and expenses paid to contractors must represent appropriate and justifiable remuneration for legitimate services to be provided and must be paid directly to them. Accurate financial records of all payments are required.

The companies of the Business Group must adopt appropriate procedures to ensure that their contracts or agreements with contractors do not expose them to liability under any applicable anti-corruption law. Such procedures should help employees establish whether contractors represent a corruption risk and, if so, what steps should be taken to address those risks. This may include cases where the contractor is hired to act on behalf of any of the companies of the Business Group to:

- Solicit new business.
- Interact with public officials.
- In other high-risk situations.



Dear Group Empresarial Colombina,

On behalf of the company _____, I confirm that I have read and shared with individuals who have a relationship with the companies of the Group Empresarial Colombina, the following information: SUPPLIER POLICY and ETHICS POLICY, both documents contained in the RESPONSIBLE CODE OF CONDUCT OF COLOMBINA.

For record-keeping purposes, I sign this document in the city of _____ on the _____ () day of _____.

Signature: _____

Name: _____

ID: _____

(Please complete this form and return it scanned.)



Appendix: Suppliers Chapter of the Code of Conduct

Sustainable Supply Chain Approach

In line with Colombina Group's sustainability objectives, we have implemented a strategic and sustainable approach in our Procurement Model. Through this approach, we develop capabilities in our suppliers following the Strategic Supply Model with a Sustainable Focus, fostering transparent, trustworthy, and mutually beneficial relationships with all stakeholders. We also integrate social, environmental, and corporate governance factors into the supplier selection and negotiation process.

We recognize the importance of meeting the expectations of different stakeholders and understanding the social, environmental, and ethical practices of suppliers. In this regard, we work hand in hand with our strategic allies to implement development, measurement, training, and support programs, aiming for sustainable procurement in the purchasing process and managing potential risks. Our goal is to establish long-term and enduring relationships with our suppliers.

Colombina prefers to work with suppliers who manage their social, environmental, and corporate governance factors. Therefore, we continuously measure our value chain, with the sole purpose of strengthening the following impact areas in them: governance, community, workers, environment, and customers.

To strengthen our suppliers, we have implemented a program called "Measure What Matters+Colombina," which uses a measurement tool known as Impact Assessment B.

The impact areas measured in this scheme are as follows:

- **Governance:** Mission, commitment, and governance bodies, ethics, policies, and transparency, income, and accounting.
- **Workers:** Financial security (compensation), health, safety, and well-being, professional development, satisfaction, and commitment.
- **Community:** Diversity, equity, and inclusion, local impact, civic engagement, donations, supply chain/purchasing.



- **Environment:** Environmental management, air and climate, water, biodiversity, and waste.
- **Customers:** Customer relationship, impact of products or services.

The Measure What Matters Colombina program is developed in the following stages:

1. **Sensitize:** The first approach is made with the group of suppliers to be evaluated, aiming to make them aware of the importance of the triple impact, introduce them to the Impact Assessment B tool, and explain how to work with it, so companies can register and begin managing the self-assessment.
2. **Evaluate:** The measurement of social and environmental performance, risks, and improvement opportunities is carried out through the Impact Assessment B, with constant support from the team of System B Colombia Programs to suppliers. Additionally, we offer Office Hour sessions to clarify doubts and concerns.
3. **Compare and Improve:** At this stage, suppliers who have completed the evaluation are gathered to teach them how to interpret their results and visualize areas that require improvement plans. Additionally, they are provided with useful materials that allow them to further delve into best practices and the impact of their business model.
4. **Support and Train:** Based on the results obtained, we identify suppliers that need to be strengthened in each impact area. In Colombina, we have defined that suppliers with a total score below 50 points must receive support or training to strengthen their social and environmental practices. Similarly, suppliers with a compliance percentage below 40% in the result of each impact area should receive support.

We offer two modes of support to strengthen suppliers based on the results:

Support Modality: We provide a more personalized support process to a group of up to 8 companies.

Workshop Modality: We design workshops aimed at a larger number of suppliers, focusing on strengthening the impact areas that require more attention and improvement, according to partial and total results.



- 5. Reevaluate:** Companies can conduct a second review from their initial result. Those that scored below 50 points and received support or training from Colombina review their responses and update the information on implemented practices. This reevaluation helps improve results and minimize opportunities for improvement. Companies that obtained satisfactory scores but need to strengthen specific impact areas and participated in workshops or support from the company also take part in the reevaluation.

Finally, it is essential to mention that within the Procurement process for national suppliers of goods, services, promotional materials, and spare parts, there is a validation of social and environmental compliance. In situations where there are two suppliers with similar conditions in service, quality, payment terms, price, the evaluation of Social Responsibility will be one of the parameters considered in the purchasing decision.