

Annex I DEFINITIONS

1.1. Definitions:

For the purposes of this PTEE, the following definitions shall be taken into account, whether they are used in capital letters, bold or plural.

Acts of Corruption: It is any improper use of power, whether private or public, to divert the management of the public or collective towards personal benefit. This concept includes bribery in all its forms, private corruption, contracts without compliance with legal requirements, influence peddling, transnational bribery and any other act related to crimes against public administration, as well as corruption within private companies.

Transnational bribery should be understood as the act by virtue of which a natural person or legal entity, through its collaborators, Directors, shareholders, Contractors or subordinate companies, gives, offers or promises to a foreign public servant, directly or indirectly: sums of money, objects of pecuniary value or any benefit or utility in exchange for said Public Official performing, omitting or delaying any act related to his functions and in connection with an international business or transaction.

Agent: It is a third party authorized to act, directly or indirectly on behalf of the organization before third parties; such as, for example: Customs brokerage companies, investment banks, lawyers, processors, lobbyists or any type of intermediary.

Close Associates: Close associates shall be understood as legal entities that have as administrators, shareholders, controllers or managers any of the PEPs listed in article 2.1.4.2.2.3, or that have constituted autonomous estates or trusts for their benefit, or with whom commercial relations are maintained, to whom due diligence shall be applied in accordance with the regulations in force".

Collaborator: Employees, trainees and apprentices of the organization.

Senior Management: These are the natural or legal persons appointed in accordance with the Company's bylaws and Colombian law, as the case may be, to manage and direct Alpina. Senior Management naturally includes the members of the Shareholders' Meeting.

Associates: Those individuals or legal entities that have made a contribution in money, work or other assets that can be valued in money to a company in exchange for quotas, interest parts, shares or any other form of participation contemplated by Colombian law.

Compliance Audit: This is the systematic, critical and periodic review of the proper execution of Alpina's Business Ethics and Transparency Program.

Whistleblower Channels: These are the mechanisms described in section 7.7.1 of this Program, through which the Company may be informed of any improper conduct that may constitute an Act of Corruption of its employees, associates, suppliers or Contractors.

Customers and Business Allies: These are the natural or legal persons who buy or lease or take in concession the real estate units resulting from the projects developed by Alpina

within the framework of its corporate purpose. The term Clients also includes potential Clients.

Contractor: Refers, in the context of a national or international business or transaction, to any third party providing services to Alpina or having a contractual legal relationship of any nature with Alpina. Contractors may include, but are not limited to, suppliers, intermediaries, agents, distributors, advisors, consultants and persons who are party to collaboration or risk-sharing contracts with the Legal Entity.

Conflicts of Interest: A conflict of interest arises when a compliance officer is faced with a situation in which he must choose between the duties and obligations of his position and his own private interests.

Conservation: Method that ensures the physical durability of documents.

Corruption: It is understood as the intentional breach of the law and/or Alpina's principles, rules and values, with the purpose of extracting unjustified benefits or personal gains from this type of conduct, either directly or by unfairly favoring third parties against the Company's interests. Likewise, any conduct aimed at benefiting Alpina, or 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.

Custody: Legal responsibility for the conservation and administration of information assets.

Due Diligence: Refers to the periodic review of legal, accounting and financial aspects related to the Company's business, both domestic and international, whose purpose is to identify and assess bribery risks that may affect the Company and its suppliers. It also refers to the process of constant and periodic review and evaluation that Alpina must carry out according to the Transnational Bribery Risks to which it is exposed. In no case shall the term Due Diligence defined in this document refer to the due diligence procedures used in other risk management systems (e.g., money laundering and financing of terrorism and financing the proliferation of weapons of mass destruction), which are governed by different rules.

Anti-Corruption Provisions: These are Laws 1474 of 2011 and 1778 of 2016, and those that modify or complement them, Resolution 100-006261 of 2020 and External Circular 100-000003 of 2016 issued by the Superintendencia de Sociedades, and those that modify or complement them, as well as to all international conventions signed by Colombia, including 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 Organization for Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 2012.

Element of Value: Includes cash or cash equivalents, gifts or gift certificates, discounts, travel or travel expenses such as per diem, scholarships, entertainment, dinners, sponsorships, donations, loans, political contributions, offers of employment, grants, commissions.

Anti-Corruption Statute: This refers to Law 1474 of 2011, which establishes rules aimed at strengthening the mechanisms for the prevention, investigation and punishment of acts of corruption or bribery and the effectiveness of public management control, as well as the regulatory decrees and other rules that modify, replace or complement it.

Permitted Events: Refers to the cases in which the Compliance Subjects are allowed to give, offer, receive, authorize, or promise gifts in accordance with the provisions of this PTEE.

Public Official: Any natural person who holds a position in Colombia in any of the branches of public power, autonomous bodies or control bodies, regardless of whether they are national, departmental or municipal; whether they are elected by popular vote, merit-based competition or free appointment and removal; their hierarchy; or whether they are called members of corporations, public collaborators or official workers in Colombian regulations. Likewise, members of the public force, private individuals who exercise public functions on a permanent or transitory basis, officials and workers of autonomous bodies such as the Bank of the Republic or collaborative bodies by decentralization or deconcentration such as the Notary Public Offices and the Registry Offices are considered to be public officials. These terms are broadly interpreted to include any person working for a government agency, any candidate of a political party, and any company owned or managed by a government official. Also, "government" includes all branches, levels and subdivisions of any government. Government officials include but are not limited to:

- Any elected or appointed government official or representative.
- A current or former employee, officer, official, contractor, consultant or representative of a government or of any state or state-controlled department, agency or enterprise.
- Any current or former employee, or person acting for or on behalf of an officer, agency or corporation performing a governmental function, such as a licensing officer or fiscal agent.
- Any political party, official, employee or person acting for or on behalf of a political party or candidate for public office.
- A person in the service of a government, including members of the military, police or civil service.
- Immediate family members and relatives of any of the above.

Governmental entity: is any national, state, regional, municipal or local government, public entity, public corporation (including a sovereign wealth fund) or state-owned or state-controlled entity.

Government: Any national, departmental or municipal authority with which Alpina, in the development of its corporate purpose, has a relationship, not limited to urban, planning or environmental authorities. Likewise, industrial and commercial companies owned or controlled by the State shall be understood as such.

Stakeholders: Refers to Investors, Internal Collaborators, Senior Management, Customers, Community, Government, Suppliers, Subordinate Companies, if any.

Hospitality: hospitality is considered to be any value related to the receipt of entertainment by a third party. Within this category we find invitations to eat and drink; tickets to theaters, musicals, sporting events; courses of any category; invitations to clubs. Ordinary business meals and food and beverages provided in our offices are not considered hospitality.

Archival instruments: Tools with specific purposes to support the development and implementation of document management.

Investors: Natural or legal persons that make joint investments with Alpina in the development of the projects.

Law 1778 or Anti-Bribery Law: Refers to Law 1778 of February 2016 its amendments and additions.

Transnational Bribery Risk Matrix: This is the tool that allows the Company to identify the Transnational Bribery Risks to which it may be exposed.

Operating Model: Refers to the activity of defining a business model as one of the main dimensions that business models should include. With information regarding costs, pricing methods and revenue structure.

International Business or Transactions: International business or transaction means business or transactions of any nature with foreign natural or juridical persons under public or private law.

Facilitation Payments: Payments made to Public Officials or National or Foreign Public Servants, for the purpose of securing or expediting routine governmental action or procedure, for the benefit of an employee or Alpina.

Politically Exposed Person or PEP: Corresponds to the definition established in Article 2.1.4.2.2.3. of Decree 1081 of 2015, as amended by Article 2° of Decree 830 of July 26, 2021.

PTEE: Refers to Alpina's Business Ethics and Transparency Program.

Suppliers: These are natural or legal persons who provide services to Alpina and who are bound by service contracts, purchase orders, commercial offers and any contract, regardless of its nature, through which goods and/or services required by Alpina are provided. The term Suppliers may include, among others, contractors, intermediaries, agents, distributors, advisors, consultants and persons who are party to collaboration or risk-sharing contracts with the Company.

Economic extortion: Economic extortion is understood as any act of bending the will of an official accompanied by force and/or intimidation, in order to obtain a benefit from the company for himself or for a third party; in this sense the organization rejects any extortive act, which generates criminal sanctions regulated in law 599 of 2000 Colombian Penal Code.

Fraud: Dishonest activity, deceit or intentional or negligent omission designed to deceive others and generate a loss for the victim and/or a profit for the perpetrator. Fraud can be contextualized, depending on its sources, as internal, external or mixed fraud.

Financial Fraud: Refers to the alteration, modification or manipulation of a company's accounting or financial information for the purpose of reflecting an erroneous or misleading economic situation. The types of financial fraud are Financial Metrics, Cash Flows and Revenue Recognition.

Financial metrics are characterized by showing erroneous indicators that overstate performance and by distorting balance sheet indicators to avoid showing impairment.

Financial cash fraud specializes in replacing cash inflows to the operating section, shifting operating cash outflows to investments, inflating operating cash flow using acquisitions or disposals, and boosting operating cash flow using unsustainable operations.

Financial fraud by revenue recognition is characterized by recognizing revenue in advance, recording false revenue, boosting revenue using unsustainable activities, shifting current expenses and revenue to a later period, and using other techniques to hide expenses or losses.

Embezzlement of assets: It is defined as the intentional or culpable act of disposing of the entity's assets or those for which it is responsible, for its own benefit or that of third parties in such a way as to cause detriment or distortion of the financial statements.

They are classified as Cash and Inventories and other assets. Cash includes theft of money through receipts (fictitious sales, unrecorded sales, alteration of accounts receivable, alteration of receipts and receipts without reconciliation), theft of cash and fraudulent disbursements (paper company, unauthorized vendors, phantom employees, falsified salaries, commission schemes, false suppliers, false endorsements, alteration of beneficiary and false transactions). Inventory and other assets include misuse of company assets, and theft by repurchase or transfer of assets, false sales and shipments.

Facilitation payments: are generally minor, unofficial, non-transparent payments required by government officials in some countries to perform or expedite routine governmental acts to which the Company is entitled.

PQR: For this procedure, it corresponds to requests, complaints or claims, submitted by Alpina's internal users.

Gifts, hospitality, courtesies or entertainment: These are goods or benefits that are given to a third party without the third party paying anything in return. This includes: tangible or intangible goods such as: services, training, discounts, loans, advantageous conditions for obtaining a product or service, prizes, travel, transportation, tickets to concerts or entertainment events, shares, use of vacation facilities, favors or recreation.

In the event that the goods have a clear identification of the promotion of a service or the name of an organization, they are considered "promotional".

Transnational Bribery Risks or ST Risk: The possibility that a legal person directly or indirectly gives, offers or promises 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/her functions and in connection with an International Business or Transaction.

Bribery: the giving or receiving by a person of anything of value (usually money, a gift, loan, reward, favor, commission or entertainment), as an inducement or improper reward for the procurement of business or any other benefit

Transnational Bribery: The act by virtue of which a legal person, through its Collaborators, administrators, Associates, Contractors or Subordinate Companies, gives, offers or promises to a foreign public servant, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value or (iii) any benefit or utility in exchange for said public servant performing, omitting or delaying any act related to his functions and in connection with an international business or transaction.

Foreign Public Servant: Any person who holds a legislative, administrative or judicial position in a State, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of whether the individual has been appointed or elected. A foreign public servant is also considered to be any person who exercises a public function for a State, its political subdivisions or local authorities, or in a foreign jurisdiction, whether within a public agency, a State 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. It shall also be understood that any official or agent of a public international organization has the aforementioned capacity.

Subordinate Company: It has the scope set forth in Article 260 of the Code of Commerce.

Compliance Subjects: Refers to Internal Collaborators, Suppliers, Senior Management, Customers, Subsidiaries and Subordinate Companies and any other person who has business relations with Alpina.

Documentary Unit: It is an organized unit of documents, united for their current use, because they refer to the same subject, activity or matter.