

**TRANSPARENCY AND BUSINESS ETHICS
PROGRAM**

PTEE



Compliance Management



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TRANSPARENCY AND BUSINESS ETHICS PROGRAM

1. GENERAL.

1.1. Introduction to the Transparency and Corporate Ethics Program (PTEE)

The Transparency and Corporate Ethics Program (hereinafter referred to as "PTEE") is aimed at gathering the best business practices, in order to ensure that our values and ethical principles always prevail in all behaviors of our employees and other stakeholders. For these purposes, this PTEE is addressed to all counterparts such as workers and internal collaborators, suppliers, customers and other stakeholders linked to the company. In full compliance with all the provisions



set forth in Laws 1474 of 2011 and 1778 of 2016, External Circular 100-000011 of 2021 issued by the Superintendencia de Sociedades (entity in charge of regulating and supervising the activities of companies in Colombia), Law 2195 of 2022, Decree 1736 of 2020 and the regulations that modify or complement them, as well as in 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 (hereinafter the "Anti-Corruption Provisions").

At Alpina, relations with employees, suppliers, customers and other stakeholders are based on the premise that mutual actions must be distinguished by trust and transparency. These fundamental premises of conduct are established and conceptually consolidated in this Transparency and Business Ethics Program, which includes the corporate values and principles, based on which Alpina intends to ensure that it has high ethical and self-regulation standards.

1.2. Objective.

The purpose of this PTEE Manual (the "Manual") is to establish the guidelines and rules that all managers, partners, collaborators, suppliers, allies and other persons subject to the program must comply with in their relations with the different counterparties (as defined below) of Alpina, in order to prevent, identify and mitigate acts of corruption and transnational bribery, and to define the stages, elements and methodologies necessary to control and manage the risk of corruption and transnational bribery in the development of its corporate purpose.

1.3. Scope.

This Manual is applicable to all administrators, partners, collaborators, suppliers, allies, and any person who directly or indirectly acts on behalf of or in representation of Alpina.

The policies, methodologies, definitions and procedures included in this Manual are mandatory, and any violation of its provisions may result in penalties for violation of the employment contract or termination of contracts, as well as legal actions of a criminal or administrative nature, according to the seriousness of such violations.

2. Regulations

2.1. International norms and standards.

As part of Colombia's significant efforts to combat corruption, an international legal framework has been adopted, including the following conventions and agreements:

- The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- The Inter-American Convention against Corruption of the Organization of American States - OAS;



- The United Nations Convention against Corruption (UNCAC).

Some of the above instruments expressly promote the adoption of compliance programs and codes of conduct by companies.

Thus, for example, the OECD recommendation to combat foreign bribery, adopted in 2009, urges member countries to encourage companies to develop and adopt adequate internal controls, ethics and compliance programs or measures to prevent and detect bribery of foreign public officials.

2.2. National standards.

a. Article 23 of Law 1778 of 2016, establishes the duty of the Superintendencia de Sociedades to promote in the companies subject to its oversight, the adoption of transparency and Corporate ethics programs, internal anti-corruption mechanisms, internal audit mechanisms and standards, promotion of transparency and mechanisms for the prevention of Transnational Bribery conducts.

b. Article 86, paragraph 3 of Law 222 of 1995 states that the Superintendencia de sociedades is empowered to impose sanctions or fines, successive or otherwise, up to two hundred (200) SMMLV, on those who fail to comply with its orders, the law or the bylaws.

c. Article 7, paragraph 28 of Decree 1736 of 2020, it is the responsibility of the Superintendencia de Sociedades to "instruct, in the manner it determines, entities subject to its supervision on the measures they must adopt to promote transparency and business ethics in their business practices in order to have internal mechanisms to prevent acts of corruption (...)", so as to have more companies, more employment, and competitive, productive and sustainable companies.

d. Circular 100-00011 09-Aug-2021 Superintendencia de sociedades .

e. Administrative Liability Regime for Legal Entities - Law 2195 of 2022 - Transparency, prevention and fight against corruption.

f. Law 2155 of 2021 Article 631-5. Definition of Beneficial Owner.

2.3. Design and Approval.

The Company designed and approved the PTEE by adopting the following specific actions:

- The PTEE is approved by the minutes of the company's highest corporate body.
- For the design of the PTEE, we proceeded to identify the risks of Transnational Bribery to which the Company is exposed considering its size, industry or economic sector, geographic areas, third party intermediaries, among others.
- The PTEE was structured in such a way as to identify, detect, prevent and mitigate the risks of Transnational Bribery, creating adequate procedures and controls and assigning specific functions to the Company's internal collaborators.
- By means of this act of the highest corporate body, it was established that the PTEE and the guidelines contained therein shall be of mandatory application and compliance by the Company, its internal employees and other stakeholders.



2.4. Duties of the Company:

- All payments or disbursements of Alpina's resources to its Contractors or collaborators, whether domestic or foreign, must be made through banking channels, where it is possible to trace all movements and payments.
- All payments for services abroad must comply with the Colombian exchange regime and be channeled through authorized banking entities or through clearing accounts duly registered with Banco de la República.
- All payments made to Contractors or collaborators must be supported by the amounts stipulated in the Contract, and may be audited by specialized firms to confirm the legality of the payments, the non-diversion of resources, and the non-concealment of payments to third parties through the contractor, or payments to contractors without contractual justification.

2.5. Prohibitions of the Company:

The Company may not instruct its employees to make payments in violation of the procedures described above.

3. COMPLIANCE POLICIES.

All Alpina's partners, managers, employees and suppliers shall take into account the following policies to prevent and mitigate the risk of corruption and transnational bribery:

- a. Alpina rejects dishonest practices and corruption in all its forms, including extortion and bribery.
- b. All operations, businesses and contracts carried out by Alpina shall comply with the policies and procedures set forth in this Manual, and with other internal rules that regulate Alpina.
- c. Alpina refrains from doing business and/or entering into transactions with persons and/or entities of questionable ethical or commercial behavior.

We reject any offer or delivery made directly or through third party intermediaries, such as agents, consultants, contractors, or similar, of payments in money or in kind or even favors such as work contracts or consultancies that may unduly influence the decision of a government official or a private individual who must make a decision related to a procedure or business of interest to Alpina.

If an employee receives a request for a bribe, fraud or suspicious payment from a person or entity, this request must be reported immediately through the established channels.

Employees must carry out due diligence processes for the adequate knowledge of the third party and make the corresponding decisions during the selection of contractors, consultants and/or independent professionals.

Senior management fully supports all employees and representatives who refrain from making improper payments, even if a business opportunity is lost as a result.



d. The relationship with public officials deserves special care and therefore the following situations should be considered as high risk:

- Entering into a contract with a Governmental Entity.
- Making any contact with a public official on behalf of Alpina.
- Alpina's support in participating in a transaction with a Government Entity.
- Obtaining a license, permit or government registration in Alpina's name.

The following activities are considered acts of corruption:

- Diverting money for the purpose of committing an act of corruption.
- Unlawfully altering a contractual procedure in a public, private or special solicitation process.
- Promise, offer or grant, directly or indirectly, to a third party an undue advantage for oneself, another person or the company (includes facilitation payments) .
- Favoring, in the exercise of their functions, their own interests or those of a third party over the interests of the company.
- Soliciting payments (whether in cash or in kind) from third parties to obtain a personal benefit other than the rights contracted with the Company.

Policy on financial and accounting management.

Alpina's managers, employees, suppliers and partners shall at all times ensure the integrity, accuracy and reliability of the accounting and financial information, which shall fairly and accurately reflect all transactions in reasonable detail, in accordance with applicable accounting and tax regulations. It is strictly prohibited to engage in conduct that tends to hide, change, omit or misrepresent accounting records to conceal improper activities or that does not correctly indicate the true nature of a recorded transaction.

3.1. Counterparts

- a. Alpina shall carry out the due diligence processes contemplated in this Manual and in the SAGRILAF Manual, in order to adequately know potential suppliers, especially if such suppliers have PEP's as final beneficiaries. Likewise, Alpina shall perform due diligence processes on partners, managers and collaborators in order to reasonably know their reputational and sanctioning background (administrative, criminal and disciplinary) and their legal and accounting (financial) suitability.
- b. Alpina will monitor its counterparties to identify warning signs.
- c. Alpina will leave evidence in documents and supports of all transactions or business with counterparties, whether through a contract, purchase order or service order.
- d. In the event of a breach by an employee of any of PTEE's policies and procedures, an investigation process will be initiated, which may result in the termination of the employee's employment contract.

Conflicts of interest between the different parties related to PTEE, in which personal interests are opposed to those of the company and may generate a personal, economic or commercial



benefit for one of the parties to the detriment of the other, or affect the transparency, fairness and responsibility of the decision-making process within the company, will be resolved based on the guidelines of the code of conduct and in compliance with the applicable regulations.

4. POLITICAL AND PHILANTHROPIC DONATIONS; PROCEDURE FOR POLITICAL DONATIONS AND POLITICAL ACTIVITIES

4.1. Donations Procedure:

4.1.1. Purpose of donations:

The purpose of all of the Organization's donations must be framed within the strategic focuses for Sustainability and Relevant Issues described in the Sustainability procedure.

Any donation made outside the relevant matters described above must respond to the result of an analysis that justifies the pertinence, relevance and impact of the donation for the beneficiary entity and for Alpina, and must be approved by the Executive Management.

4.2. Verification and Audit:

The Sustainability Directorate will have the authority to verify and intervene in the pertinent processes to ensure compliance with these guidelines.

All guidelines, processes, formats and other elements associated with this policy shall be subject to verification by Alpina's internal and external audit, in accordance with the procedures defined for such purpose.

Any action that is not within the framework of this policy or information reported that is not truthful will be considered serious misconduct and will give rise to the sanctions provided for in the Internal Work Regulations.

4.3. Philanthropic Donations:

Philanthropic donations correspond to donations, for example: (money, goods, use of Company facilities, sponsorships, resources or time of Employees) given to charitable or non-profit organizations, for the benefit of the community or for philanthropic purposes.

With regard to philanthropic donations, Employees should be aware of the risk that they may be used as a front for corruption and other improper purposes. A philanthropic donation will be permitted, provided that it complies with the following guidelines:

- It is known who is the recipient of the donation and for whose benefit it is being made.
- The donation is made for philanthropic purposes, for and on behalf of a registered or recognized charitable or non-profit organization, and not for a natural person.
- The donation is made in accordance with all legal requirements.



- The donation is duly documented
- The donation is not a requirement for the course of action by any natural person or organization, or it should be made without conditions or expectation of receiving anything in return.
- The donation is not made to secure business or to obtain undue advantage.

Prior to donations, the following must be ensured:

- Know the recipient of the donation and for whose benefit the donation is being made.
- The Sustainability area is responsible for reviewing and approving requests for philanthropic donations.
- Prior to authorizing any donation, the Approver must ensure the due diligence of the recipient including its reputation and document it.
- In case red flags are identified: Conduct enhanced due diligence, compliance information of the receiving entity, among others.
- Take the necessary measures to ensure that the funds are transferred to a bank account in the name of the receiving entity and in the country concerned (for example ensure that they are not paid to a Third Party).
- *No political donations, under any circumstances, or political contributions will be made.*

4.4.Receiving gifts and hospitality

Giving and receiving small personal gifts is often part of our local culture and is dictated by tradition. In general, a gift is allowed, as long as it is not expensive or frequent.

*Alpina offers promotional gifts and hospitality to strengthen ties with third parties, in accordance with commonly accepted standards, as long as they are: **timely, moderate, infrequent, not excessive and do not compromise the objectivity and good judgment of its employees.***

Gifts, Entertainment and Hospitality that may normally be accepted are those that do not exceed USD 100 and whose importance does not generate preferences or commitments towards the giver or the entities he/she represents.

Offers of business travel to events shall always be approved by the Steering Committee, according to the established guidelines.

Gifts will not be acceptable in:

- *Cash or gift certificates*
- *Stocks or stock options*
- *Any gift that could compromise the reputation and good judgment of Alpina Group employees.*
- *Loans*
- *Consultancies*



- *That violate any law, local regulation or rule of the recipient's organization."*

In addition to the above:

- Alpina employees must refrain from accepting gifts, gratuities, hospitality or preferential treatment that may be inappropriately intended to influence the performance of their duties and compromise their professional independence and responsibility to Alpina. Only gifts that, in accordance with customs and customs, and their economic value not exceeding USD 100, are simple hospitality or promotional material are acceptable.

How to behave?

If you are given a gift or offered hospitality or entertainment, or if you offer a gift, hospitality or entertainment to someone, you must assess whether you could receive or make such gifts in accordance with the requirements of ALPINA's policies and procedures taking into consideration the following:

4.4.1. Gifts and hospitality allowed

Giving and receiving small personal gifts is often part of our local culture and is dictated by tradition. In general, a gift is allowed, as long as it is not expensive or frequent. In relation to receiving gifts and hospitality, Alpina defines:

*Alpina offers promotional gifts and hospitality to strengthen ties with third parties, in accordance with commonly accepted standards, as long as they are: **timely, moderate, infrequent, not excessive and do not compromise the objectivity and good judgment of its employees.***

Gifts, Entertainment and Hospitality that may normally be accepted are those that do not exceed USD 100 and whose importance does not generate preferences or commitments to the giver or the entities he/she represents.

Offers of business travel to events shall always be approved by the Steering Committee, according to the established guidelines.

Gifts will not be acceptable in:

- *Cash or gift certificates*
- *Stocks or stock options*
- *Any gift that could compromise the reputation and good judgment of Alpina's employees.*
- *Loans*
- *Consultancies*
- *That violate any law, local regulation or rule of the recipient's organization."*

In addition to the above:

- Alpina employees must refrain from accepting gifts, gratuities, hospitality or preferential treatment that may be inappropriately intended to influence the performance of their



duties and compromise their professional independence and responsibility to Alpina. Only gifts that, in accordance with customs and customs, and their economic value not exceeding USD 100, are simple hospitality or promotional material are acceptable.

5. PROCEDURES FOR MERGERS AND ACQUISITIONS.

When Alpina participates as an acquirer in the context of merger operations, purchase of assets, shares, quotas or parts of interest, before starting the transaction it will perform due diligence on the business and the parties involved, which will include at least the review in Restricted Lists of natural persons, legal entities and their representatives and associates that have the category of beneficial owners. Likewise, the Company shall take measures to ensure that there are no acts of corruption or bribery, transnational bribery during the operation, through contractual clauses and the review of accounts and the supports of such transaction shall be kept.

6. Remuneration and commission payments to employees and counterparties.

Alpina will remunerate the work performed by the collaborators in accordance with the terms of their respective employment contracts and labor legislation. Alpina will not deliver commissions or additional remuneration of any kind to its counterparties, other than the payment due for the provision of its services or the supply of goods, as agreed in the respective contracts. All payments made by Alpina to employees or counterparties shall be made through the appropriate banking channels, where it is possible to determine the traceability of all movements.

All payments made to counterparties must be supported by the values stipulated in the contracts and/or purchase orders and may be audited by Alpina or a specialized third party to confirm the legality of the payments, the non-diversion of resources, and the non-concealment of payments to third parties through the counterparty, or payments to counterparties without contractual justification. No Alpina employee may make payments that violate the PTEE or Alpina's internal policies.

6.1. Whistleblower protection policy

In the event that complaints or reports of possible acts of corruption or transnational bribery are filed within Alpina or with respect to its employees, suppliers, partners or managers, the identity of the person filing the complaint or report will be kept confidential, and the information contained in the complaint or report will be treated as confidential information.

Under no circumstances may Alpina's managers, partners or employees retaliate against a whistleblower or reporter of a possible situation of corruption or transnational bribery. The Compliance Officer will ensure that there is no retaliation.

7. PROCEDURES

This chapter describes the procedures, understood as the steps, actions or actions carried out by Alpina to comply with the policies of this Manual.



7.1. Due diligence .

This due diligence procedure includes reputational, legal, accounting (financial), third party relationship, sanctions (criminal, disciplinary, penal) to mitigate risks related to suppliers, customers, employees, business partners and third party intermediaries. This policy consists of the following steps:

- a) **Initiation of the due diligence process:** For new relationships with suppliers, customers, collaborators, business partners and third parties, the due diligence process must be initiated by the person in charge of the relationship, by requesting documentation and filling out the knowledge forms.
- b) **Study the information and supporting documentation:** The person in charge of the relationship will study the information and documentation provided by the third party. He/she must ensure that the information provided is truthful and corresponds to reality. In the case of suppliers, the area in charge has the obligation to verify that the work to be performed by the supplier in favor of Alpina corresponds to the social activity registered by the third party.
- c) **Complete reports of external detection and due diligence:** The Master Data area must perform the query in restrictive and control lists prior to the linkage and the support of the query generated by the tool in force must be left.
- d) **Evaluate the file for linkage approval:** In the event that the query yields any coincidence in restrictive and control lists or any warning sign, the support must be sent to the Transparency and Compliance area to proceed to perform the respective Intensified Due Diligence and will depend on the analysis and approval of the Compliance Officer.

7.2. Due diligence intensified

The process through which the Company adopts additional and more intense measures for the knowledge of the Counterparty, its business, operations, products and volume of transactions. It implies an advanced knowledge of the Counterparty and the origin of the assets received, in order to prevent the Company from being used as a means for the execution of illicit activities that may lead to incurring in any legal, operational, contagion or reputational risk. For this purpose, the defined internal procedures shall be used.

The enhanced due diligence process shall contain at a minimum:

- Consultation in the tool provided, additional, individual consultation in restrictive lists, control lists, search in public sources and press releases.
- Depending on the criticality of the case, a more detailed report of the counterparty's information will be generated in the tool provided (financial, accounting, economic activity, commercial relations, international operations).
- A report must be generated with all the information gathered, which will depend on the approval of the compliance officer.

In addition to the measures applied within the due diligence process, the following procedures, among others, must be applied for these counterparties:



- Approval of the Compliance Officer to bind or to continue the contractual relationship.
- Request for additional information to determine the origin of the funds, as defined by the Compliance Officer for such purpose.
- Constant monitoring of the operations carried out with the third party and in general of the contractual relationship.

7.2.1. Economic sector:

Suppliers related to the following economic sectors considered susceptible to transnational bribery¹:

- Mining and energy
- Utilities
- Infrastructure
- Pharmacist
- Health

7.3. PEP counterpart liaison

Alpina's areas in charge of the counterparty selection and engagement processes shall take into account the characteristics and criteria for classifying third parties as PEPs, according to the definitions established in this manual and the applicable regulations.

The following activities must be carried out by the areas of Alpina in charge of the counterparty engagement processes:

- Once the area in charge of linking the counterparty identifies the PEP status, it must ensure that the supply of information and supports required by Alpina to know the PEP status are complete.
- The query must be made in restrictive and control lists, leaving support of the query.
- The internal report must be made to the Transparency and Compliance area, which will proceed to perform enhanced due diligence of the counterparty, making sure to identify and verify the identity of the PEP and related persons,
- The due diligence report must be sent to the Compliance Officer for analysis and respective approval.

7.3.1. Criteria defined by Alpina's highest corporate body (PEP, family nucleus, close associates)

¹ Superintendencia de Sociedades; "International bribery, money laundering and financing of terrorism: compilation of current regulations". Available at: https://www.supersociedades.gov.co/delegatura_aec/normatividad/estudios_economicos_financieros/doc_soborno/SOBORNO%20INTERNACIONAL%20PDF%20FINAL.pdf



- No matches on restrictive and watch lists (related to C/TB offenses), analysis of past and current investigations, convictions for corruption, bribery and other related offenses.
- Enhanced Due Diligence (Evaluate the perception of legal background, media reputations, and individual inquiries)
- Determine whether the counterparty's sources of income are legitimate
- Evaluate the level of the PEP position and its duration. Example: (Minister, Mayor, Councilor) since a higher level position may generate a higher level of risk.
- Approval by the Compliance Officer.

7.4. System audit

The annual audit plan shall include the verification of compliance with the PTEE, in order to serve as a basis for the Compliance Officer and the management of the Obligated Company to determine the existence of deficiencies in the PTEE and their possible solutions. In this sense, the result of such internal audits must be communicated to the legal representative, the Compliance Officer and the board of directors or the highest corporate body.

7.5. Contractual controls with suppliers

To ensure compliance with the PTEE, Alpina will include the following in the contracts entered into with its suppliers:

- a. Confirmation that the supplier has been informed by Alpina regarding its obligation to comply with the rules related to the prevention of corruption and transnational bribery.
- b. Statement of the possibility of unilaterally terminating the contract or agreement when the supplier incurs in conduct related to corruption, transnational bribery or non-compliance with this Manual.
- c. The authorization to Alpina to advance with respect to the supplier, its managers and partners, due diligence procedures aimed at determining their history of bribery and corruption.
- d. The prohibition of submitting false information.
- e. The prohibition of incurring or making the payment of gifts, bribes or illicit payments of any kind, in accordance with Alpina's policies.
- f. Information confidentiality agreements, indicating the legal and contractual consequences of their violation, and the violation of information systems.
- g. The understanding and acceptance of the Company's policies regarding the receipt and delivery of gifts, presents, gratuities, per diems or courtesies that are not permitted.

8. WARNING SIGNS

Warning signs are situations that Alpina takes into account and that must be known by partners, managers and collaborators in order to consider that there may be atypical situations that require further analysis to determine whether bribery and/or corruption situations have occurred or will occur. Any warning signs must be reported to the Compliance Officer immediately or within a reasonably short period of time from the moment they become known.

The following warning signs, among others, shall be taken into account:



In the analysis of accounting records, operations or financial statements:

1. Invoices that appear to be false or do not reflect the reality of a transaction or are inflated and contain excess discounts or rebates.
2. Foreign operations whose contractual terms are highly sophisticated.
3. Transfer of funds to countries considered as tax havens.
4. Operations that have no logical, economic or practical explanation.
5. Transactions outside the ordinary course of business.
6. Transactions in which the identity of the parties or the origin of the funds is unclear.
7. Assets or rights included in the financial statements that have no real value or do not exist.

In the corporate structure or corporate purpose:

1. Complex or international legal structures with no apparent commercial, legal or tax benefits or owning and controlling a legal entity with no business purpose, particularly if it is located abroad.
2. Legal entities with structures in which there are national trusts or foreign trusts, or non-profit foundations.
3. Legal entities with "off shore entities" or "off shore bank accounts" structures.
4. Non-operating companies under the terms of Law 1955 of 2019 or that due to the conduct of business may be considered as "paper" entities, i.e., that reasonably do not fulfill any commercial purpose.
5. Companies declared as fictitious suppliers by the DIAN.
6. Legal entities in which the beneficial owner is not identified

In the analysis of transactions or contracts:

1. Frequent recourse to consulting contracts, intermediation and the use of *joint ventures*².
2. Contracts with suppliers or state entities that give the appearance of legality and do not reflect precise contractual duties and obligations.
3. Contracts with suppliers that provide services to a single customer.
4. Unusual losses or gains on contracts with suppliers or government entities or significant changes without business justification.
5. Contracts containing variable remunerations that are not reasonable or that contain payments in cash, in Virtual Assets³ or in kind.
6. Payments to PEPs or persons close to PEPs.
7. Payments to related parties (associates, collaborators, subordinate companies, branches, among others) without apparent justification.

² A joint venture is an agreement by virtue of which two or more firms join together, combine their resources, and integrate part of their operations, in order to achieve certain commercial goals. The most common types of joint ventures in the business world are: research and development, production, marketing and sales, purchasing and networking. (*Resolution No. 553 of 2013 Superintendence of Industry and Commerce*).

³Number 2 of External Circular 100-000016 of 2020 defines virtual asset as "*the digital representation of value that can be traded or transferred digitally and can be used for payments or investments. Virtual assets do not include digital representations of fiat currency, securities and other financial assets that are already covered elsewhere in the FATF Recommendations.*"



8.1. Segmentation model.

A methodology was established to perform the segmentation of the different factors of Corruption and Transnational Bribery (C/TB) risks, in order to determine those segments that, according to their level of risk, require more frequent and more detailed monitoring, see annex "Alpina segmentation procedure" and "Alpina segmentation matrix".

Once the risk factors are evaluated, the tabulation weighting assigns a rating to the counterparties identifying the level of risk:

- Low with a rating of 1
- Moderate with a rating of 2
- Intermediate with a score of 3
- High with a rating of 4
- Critical with a rating of 5.

The score will place the counterparty in a rating cell, depending on the risk of the development of its activity and its nature, in order to monitor its transactions with the periodicity recommended by the risk category.

Monitoring Table

AL/FT/FPWMD Risk Profile -C/TB	Rating	Monitoring
1 - Low Risk	0, < 2	Annual
2 - Moderate Risk	>2 < 4	
3 - Intermediate Risk	>4.1 < 5	
4 - High Risk	> 5.1 < 6	Semiannual
5 - Critical Risk	>8 < 10	

The segmentation matrix will be reviewed on an annual basis of the variables to examine whether it effectively provides knowledge about the third party.

The compliance area may also include other factors in addition to materiality that allow for more knowledge of the third party, its environment and economic activity.

9. RISK MANAGEMENT .

Enterprise Risk Management is the process of identifying risks within an organization in order to understand the significance and relevance of those risks to the processes in order to address them through a coordinated plan, implementation of controls and assignment of responsibilities.

Alpina will take as a reference the methodology contained in numerals 6.4.3 and 6.4.4 of the Colombian Technical Standard ISO 31000 on risk management (Version of August 6, 2018).



Information related to risk management, such as the identification of events and risk factors, risk measurement, risk control and monitoring can be found in the annex "PTEE - Alpina risk identification matrix".

10. Risk identification.

Alpina recognizes that, within the execution of the Company's social activity, it may be associated with the risks listed below, through allied companies such as customers or suppliers, its internal collaborators, shareholders, and in general all Stakeholders, which are:

- **Legal Risk:** This refers to the risk that arises due to violations and non-compliance with laws and other regulations issued both nationally and internationally, which may result in the Competent Authorities initiating proceedings and investigations against the Company, any Internal Collaborator or any third party involved. The legal risk may also give rise to the opening of disciplinary proceedings within the Company.

This risk includes the risk of incurring in any type of sanction, whether economic or of any other nature, imposed by an administrative or judicial authority, national or foreign, on the Company or any Internal Collaborator or Stakeholder Group involved with the Company. This risk also refers to the sanctions that may be imposed within the Company in relation to persons who incur in the conducts prohibited in this PTEE or in any conduct that constitutes a fault against the Company's anti-corruption and anti-bribery policy.

- **Reputational Risk:** Refers to the possibility that a negative, unfavorable and counterproductive public opinion may be formed with respect to the Company, its subsidiaries, its Internal Collaborators or any third party linked to our organization, which may result in loss of Clients, decrease in revenues or judicial and/or administrative proceedings.
- **Contagion Risk:** This refers to the risk that the improper actions of the Company may spread and compromise its subordinates, if any, its shareholders, internal collaborators, suppliers and any third party related to the organization. In the same sense, there is a risk of contagion when the actions of any Internal Collaborator, Supplier and any third party that has a relationship with the organization, has a negative impact on our Company.
- **Financial Risk:** Refers to the risk of economic loss of the Company due to poor financial management by its employees.

10.1. Identification of C/TB risk factors

Transparency International, *Transparencia por Colombia*⁴ and the *OECD*⁵ were used as sources to determine the risk factors.

⁴ National Transparency Index - Results 2015 - 2016.

⁵ OECD Foreign Bribery Report - An Analysis of the Crime of Bribery of Foreign Public Officials 2014.



10.2. Risk Factors

Corruption and Transnational Bribery Risks are recognized at this stage. In particular, risks related to the hiring, admission or contracting of collaborators, senior managers, associates and contractors and those related to the handling of payments in the company are identified.

For the recognition of Corruption and Transnational Bribery Risks, the risk factors should be classified taking into account the following aspects:

10.2.1. Country risk

For Transnational Bribery Risks, it refers to nations with high corruption perception indexes, which are characterized, among other circumstances, by the following:

- The absence of an independent and efficient administration of justice,
- A high number of public officials questioned for corrupt practices,
- The lack of effective rules to combat corruption and the absence of
- Lack of transparent public procurement and international investment policies

The persons responsible for establishing international Businesses or Transactions with third parties located in the countries that meet the aforementioned characteristics have the function of reviewing and updating these counterparties annually in accordance with the due diligence procedure provided for such purpose.

Additionally, the persons in charge of linking counterparties shall have as a fundamental guideline for this risk factor the Transparency International corruption perception indexes and the list of countries, jurisdictions, domains, associated states or territories as non-cooperative and low or no taxation ("tax havens") of Article 1.2.2.2.5.1. of Decree 1625 of 2016 and any regulation that adds, modifies or replaces it. These updates do not constitute a substantial modification of this PTEE.

Persons responsible for establishing International Business or Transactions with third parties located in countries with a medium-high CPI must act in consideration of this situation and strictly observe the provisions of this PTEE Manual.

10.2.2. Economic Sector Risk

According to the report prepared by the OECD for the year 2014, there are economic sectors with a higher risk of corruption. In this sense, the risk should be determined depending on the economic sector to which the Company belongs and the suppliers and contractors with which or through which the legal business is being executed.

Additionally, the degree of risk increases in countries with high corruption perception indexes and, under certain circumstances, when there is frequent interaction between the Legal Entity, its Collaborators, Senior Management or its Contractors with Foreign Public Officials. When local regulations demand a large number of permits, licenses and other regulatory requirements for the development of any economic activity, corrupt practices are also facilitated in order to expedite a particular procedure.



Warning signs:

- Failure to properly investigate complaints received through the channels provided for this purpose by the Company.
- Offering perks, hospitality, donations or gifts in order to favor the Company or an employee in the name and on behalf of ALPINA.
- Carrying out operations, business or contracts in economic sectors that have a high corruption and bribery index.
- Due to the size and geographic scope of the Company, it is exposed to the possibility that its collaborators and contractors may be involved in conflicts of interest.
- Offering any advantage that favors the Company in import or export processes, participation in public or private bids, administrative, judicial or criminal proceedings, and in general any offer that in light of the policies and manuals implemented by the Company may be considered as an unethical or criminal activity.
- Establish or maintain links with assets (financial, movable and immovable property) to which precautionary measures have been ordered as a result of criminal or forfeiture proceedings for crimes related to corruption and transnational bribery.

10.2.3. Third party risk:

This criterion implies the need for the participation of third parties, such as contractors or subordinate companies, in the conclusion and/or execution of legal transactions. The risk increases in countries that require intermediaries for the execution of an international business or transaction, in accordance with local customs and regulations.

The participation of a Legal Entity in collaboration or risk-sharing contracts with Contractors or that the latter are closely related to high-level government officials of a particular country, in the context of an international transaction, is considered high risk.

PEPs

Warning signs:

- Benefit a third party (communities, municipalities, etc.) for the development of social or philanthropic investment projects that the Company intends to implement.
- Linking or creating clients that are related to conduct related to corruption or transnational bribery or that are referenced in restrictive lists.
- Selection and linking of suppliers that are related to corruption and transnational bribery offenses or that are referenced in restrictive lists; or that once their update has been performed, any criminal notice is evidenced.
- Linking of talent that has any kind of relationship with Corruption and Transnational Bribery, is reported in any restrictive list or has a judicial or criminal record, or that once it has been updated, there is evidence of any criminal news.
- Linking PEPs directly and indirectly in reliance on their status and not requesting knowledge information and that they are engaged in activities associated with C/TB.



- Establish and maintain commercial ties with natural and/or legal persons that purchase the company's products abroad and that are related to or investigated for activities related to corruption and transnational bribery.
- The supervisor or whoever acts in his stead, fails to enforce the clauses or policies of a contract entered into with a supplier or contractor.
- That any of its collaborators or customers act as an unauthorized distributor, making use of the discount of the products as a collaborator for the sale of products to a third party.
- Disclosing privileged information to a third party regarding activities related to the transportation and commercialization of products marketed by the Company.
- Linking or maintaining a relationship with natural or legal persons related to the operation of Ruedas that are linked to corruption and transnational bribery activities.
- Entering into factoring or confirming transactions with persons involved in transnational corruption and bribery
- Detour of personal resources, improper payments to third parties and unsupported expenses
- Failure to record purchase, sale and payment transactions that give rise to tax liability.
- Intentional act by one or more individuals of management, employees, or third parties, resulting in a misstatement of the financial statements involving falsification or alteration of records or documents, misappropriation of assets, suppression or omission of the effects of transactions in records or documents, recording of transactions without substance, and misapplication of accounting policies.
- Concealment of information in investigation processes before state or governmental entities.
- Absence of permanent monitoring of cash paid and received.
- Inappropriate use of petty cash funds
- Intentional use of the company's assets for non-permitted activities, for its own benefit or for the benefit of third parties.
- Intentionally authorizing payments for activities performed or goods received without due support or without complying with the technical and quality requirements in order to obtain a benefit for oneself or for a third party.
- To favor the hiring of personnel without complying with the established procedures in order to obtain an undue advantage.
- Alteration, distortion, deletion of payroll records
- To constitute rights in rem with owners, possessors, holders and occupants that may affect the Company's reputation.
- Financing of political campaigns for personal gain on behalf of the Company.

10.3. Measuring the risk of corruption and transnational bribery:

Once the risks are identified through the management methodology, a mechanism has been defined to measure the level of severity of the risk by determining the probability of occurrence and the impact in case of materialization, which allows establishing the level of risk in the development of the Company's activities, which can be seen in the annexes *"Risk Identification Matrix and Transnational Bribery"* and *"Alpina's Segmentation Procedure"*.



10.4. CONTROL AND MONITORING OF COMPLIANCE POLICIES AND PTEE.

Due to the complexity and changing nature of the legal relationships with state entities or international or national businesses or transactions carried out by Alpina, the risks of corruption and transnational bribery to which it may be exposed will also change. Therefore, the Company, through the Compliance Officer, shall evaluate and implement the techniques deemed most appropriate to periodically verify and evaluate the effectiveness of its procedures to prevent any act of Corruption, as well as update its compliance policies when necessary, and at least once every two (2) years.

In the same vein, Alpina shall take into account legislative and regulatory changes that occur in the different jurisdictions where it operates, as well as any other changes that may have consequences with respect to its Compliance Policies and its PTEE. The company may implement one or more of the following procedures to control and supervise the Compliance Policies and the PTEE:

- a. Supervision by the Compliance Officer with respect to the management of the risk of corruption and transnational bribery in legal relations with administrative entities or in international or national businesses or transactions in which Alpina participates. To this end, managers must put in place mechanisms that allow them to verify the effectiveness of procedures aimed at preventing any act of Corruption.
- b. Conducting periodic Compliance Audits and Due Diligence procedures, as required by the Compliance Officer.
 - Within the monitoring routines of the program, commissions within the commercial area will be taken into account for sales results, which will be analyzed by channels and, depending on whether the variation generates a warning signal, a more detailed analysis will be performed on a semi-annual basis.
 - Donations will be monitored by third party and depending on whether the behavior is out of the average, on a quarterly basis.
 - For food, lodging, travel, gifts and benefits to third parties, a semi-annual analysis of the behavior will be made with the basis provided by the accounting area and depending on the behavior if it is above average, a more detailed analysis of each case will be made.
 - For the correct application of accounting policies, the accounting records and controls defined in the annex "*Corruption and transnational bribery risk identification matrix*" will be taken into account.
 - Alpina's payments abroad will be monitored by means of sampling on a semi-annual basis.

11. ROLES AND RESPONSIBILITIES

11.1. Corporate Ethics and Transparency Program Management Bodies



In order to carry out the efficient and effective development of the controls established herein, the following are certain functions of the management bodies. These functions may be modified according to Alpina's business reality and are not understood as mandatory, as they are merely guidelines for the development of the Program.

11.2. Functions of Alpina's highest corporate body

- a. To issue and define the Compliance Policy.
- b. Define the profile of the Compliance Officer according to the Compliance Policy, without prejudice to the provisions of this Chapter.
- c. Designate the Compliance Officer.
- d. Approve the document that contemplates the PTEE.
- e. Assume a commitment aimed at the prevention of C/TB Risks, in such a way that the Regulated Entity can conduct its business in an ethical, transparent and honest manner.
- f. Ensure the provision of the economic, human and technological resources required by the Compliance Officer to perform his or her duties
- g. To order the pertinent actions against the Associates, who have the functions of management and administration in the Obligated Entity, Employees, and administrators, when any of the foregoing infringes the provisions of the PTEE.
- h. Lead an appropriate communication and pedagogical strategy to guarantee the effective dissemination and knowledge of the Compliance Policy and the PTEE to Employees, Associates, Contractors (in accordance with the Risk Factors and Risk Matrix) and other identified stakeholders.
- i. Establish the criteria for linking the PEP's counterparts.

11.3. Legal Representative:

11.3.1. Functions of the Legal Representative:

The functions of the Legal Representative with respect to this Chapter are as follows:

- a. Submit with the Compliance Officer, for approval of the board of directors or the highest corporate body, the proposal of the PTEE.
- b. Ensure that the PTEE is articulated with the Compliance Policies adopted by the board of directors or the highest corporate body.
- c. Providing effective, efficient and timely support to the Compliance Officer in the design, management, supervision and monitoring of the PTEE.



d. In those cases where there is no board of directors, the legal representative shall propose the person who will occupy the function of Compliance Officer, for the designation by the highest corporate body.

e. To certify to the Superintendencia de sociedades the compliance with the provisions of the in this Chapter, when required by this Superintendency.

f. Ensure that the activities resulting from the development of the PTEE are duly documented, so as to allow the information to be responsive to criteria of integrity, reliability, availability and compliance, effectiveness, efficiency and confidentiality. The documentary supports shall be kept in accordance with the provisions of Article 28 of Law 962 of 2005, or the rule that modifies or replaces it.

11.3.2. Inabilities and incompatibilities of the Legal Representative

Due to the difference in the functions that correspond to the legal representative and the Compliance Officer, the legal representative should not be appointed as Compliance Officer.

11.4. Compliance Officer

11.4.1. Functions

a. Submit with the legal representative, for approval of the board of directors or the the highest corporate body, the proposal of the PTEE.

b. Submit, at least once a year, reports to the board of directors or, if necessary, to the board of directors, and, at least once a year, to the board of directors default, to the highest corporate body. As a minimum, the reports shall contain an evaluation and analysis of the efficiency and effectiveness of the PTEE and, if necessary, of the If necessary, propose the respective improvements. Likewise, demonstrate the results of the management of the Compliance Officer and the management of the Obligated Entity, in general, in compliance with the PTEE.

c. Ensure that the PTEE is articulated with the Compliance Policies adopted by the board of directors or the highest corporate body.

d. Ensure effective, efficient and timely compliance with the PTEE.

e. Implement a Risk Matrix and update it according to the needs of the company of the Obligated Entity, its Risk Factors, the materiality of the Risk C/TB and in accordance with the Compliance Policy;

e. Defining, adopting and monitoring actions and tools for risk detection C/TB, in accordance with the Compliance Policy for preventing C/TB Risk and the Risk Matrix;

f. Ensure the implementation of appropriate channels to allow any person to report, confidentially and securely about breaches of the PTEE and possible suspicious activities related to Corruption;



- g. Verify the due application of the whistleblower protection policy that the Obligated Entity has established and, with respect to employees, the policy of prevention of workplace harassment in accordance with the law;
- h. Establish internal investigation procedures in the Regulated Entity to detect non-compliance with the PTEE and acts of corruption.
- i. Coordinate the development of internal training programs;
- i. Verify compliance with the Due Diligence procedures applicable to the Obligated Entity;
- k. Ensure the proper archiving of documentary supports and other information on C/TB risk management and prevention.
- l. Design the methodologies for classification, identification, measurement and control of the Risk C/TB that will be part of the PTEE; and
- m. Conduct the evaluation of compliance with the PTEE and the C/TB Risk to which it applies. the Obligated Entity is exposed.

11.4.2. Requirements

- a. Enjoy the ability to make decisions to manage C/TB Risk and have direct communication with, and report directly to, the Shareholders' Meeting.
- b. Have sufficient knowledge of C/TB risk management and understand the ordinary course of business of the Obligated Entity.
- c. To have the support of a human and technical work team, in accordance with the C/TB Risk and the size of the Obligated Entity.
- d. Not to belong to the administration, to the corporate bodies or to belong to the statutory audit body (to act as statutory auditor or to be linked to the statutory audit firm that performs this function, if applicable) or whoever performs similar functions.
- e. When the Compliance Officer is not employed by the Obligated Entity, this natural person may or may not be linked to a legal entity.
- f. Not to serve as Compliance Officer, principal or alternate, in more than ten (10) Companies. To serve as Compliance Officer of more than one Obligated Company, (i) the Compliance Officer must certify; and (ii) the body that appoints the Compliance Officer must verify that the Compliance Officer does not act as such in companies that compete with each other.
- g. When there is a corporate group or a declared situation of control, the Compliance Officer of the parent or controlling company may be the same person for all the companies that make up the group or conglomerate, regardless of the number of companies that make up the group or conglomerate.
- h. Be domiciled in Colombia.

11.4.3. Inabilities and incompatibilities of the compliance officer

- Belonging to the corporate bodies, the statutory auditors, internal audit or being a legal representative. This prohibition does not extend to those who support the work of the internal audit bodies.



- Act as Compliance Officer in more than ten (10) obligated companies, when they do not belong to the same corporate group.

11.5. Statutory Auditor:

The statutory auditor must report to the competent authorities any act of corruption that he/she becomes aware of in the course of his/her duties. In fact, Article 32 of Law 1778 of 2016, which adds paragraph 5 of Article 26 of Law 43 of 1990, imposes on statutory auditors the express obligation to report to the criminal, disciplinary and administrative authorities, for the alleged commission of crimes, which they detect in the exercise of their duties, even in spite of the professional secrecy.

11.5.1. Inabilities and incompatibilities of the Statutory Auditor

Due to the difference in the functions that correspond to the statutory auditor and the Compliance Officer, the statutory auditor should not be appointed as Compliance Officer.

11.6. Contributors:

It is the duty of all employees within the company to know, abide by and respect the guidelines contained in the Transparency and Corporate Ethics Program.

Conflicts of interest between the different parties related to PTEE, in which personal interests are opposed to those of the company and may generate a personal, economic or commercial benefit for one of the parties to the detriment of the other, or affect the transparency, fairness and responsibility of the decision-making process within the company, will be resolved based on the guidelines of the code of conduct and in compliance with the applicable regulations.

12. OUTREACH AND TRAINING

12.1. Communication

In order to effectively prevent bribery, transnational bribery and corruption, the Compliance Officer or his or her designee shall take the following actions to disseminate the Compliance Policies and the PTEE:

- a. By means of a communication by mail, corporate website or the one it determines convenient, at least once a year addressed to employees and associates, indicating the obligation of managers to prevent corruption, bribery and transnational bribery. Communications will also be made on: financial controls policy, gifts and donations, whistleblower channels, sanctions for non-compliance with the PTEE.
- b. Publish the Manual in a place accessible to the counterparts.



- c. In the formalization of contractual relationships with managers, partners, collaborators and new suppliers, it shall make known the anti-corruption commitment and invite compliance with it.

7.1. Training

To ensure that the PTEE is adequately understood by the employees obliged to comply with it, the Compliance Officer shall coordinate training plans on an annual basis that provide the necessary tools to comply with the PTEE according to the risk level of the counterparties (relationship with government contracts, relationship with countries with a high risk of transnational bribery).

Training and disclosure shall remind managers of their obligation to prevent corruption. The annual disclosure of information shall contain as a minimum:

- The financial controls policy,
 - the delivery of gifts and donations,
 - the whistleblower channel and sanctions for employees and managers.
- a. Raise awareness of the C/TB Risks to which the Obligated Entity is exposed.
- b. To be updated when circumstances so require, in response to the changing dynamics of the specific risks of Corruption faced by Employees, managers and Associates.

Therefore, greater attention should be given to individuals or businesses that are more exposed to such risks, such as Employees or Associates involved in government contracting activities or distribution businesses in countries or geographic areas with a high risk of Transnational Bribery. Likewise, anti-corruption training must be extended to those Contractors identified by the Compliance Officer, as established in the Risk Matrix and the Compliance Policy.

13. WHISTLEBLOWER PROCEDURE

13.1. Complaints channel.

Alpina provides Compliance Subjects with a mechanism through which they can contact the Compliance Officer in order to resolve any concerns regarding the scope and interpretation of Alpina's PTEE.

The Company has an ethics line that allows its shareholders, directors, employees and dependents in good faith, confidentially and without fear of reprisals, to report irregular conduct in the following matters to the organization:

- Conflict of Interest with Third Parties
- Non-compliance with PTEE Policies and Procedures

Employees, Suppliers, Contractors or Senior Management shall send their communications in matters related to the PTEE, confidentially, in good faith and without fear of reprisals to the Compliance Department through the following channels:



01-8000 188899
(1) 5 71 86 23 en C/marca



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In any case, the Directorate shall maintain the confidentiality of the complainant, the facts investigated, and the person or persons against whom the complaint has been filed.

Compliance Subjects must bear in mind that it shall be a violation of the PTEE when they fail to denounce or report actions of which they are aware that have been carried out by any other Compliance Subject, or when they refuse to cooperate in investigations arising from a complaint. Alpina will not retaliate against any Compliance Officer who, in good faith, reports through viable alternatives any behavior that in his or her judgment may constitute a violation of the Company's Business Ethics Program. The Compliance Officer shall adopt the pertinent measures to protect the whistleblower and shall verify that no harassing conduct is undertaken against whistleblowers.

13.2. Transnational Bribery Report to the Superintendencia de sociedades

The Company shall inform its Employees of the following channels available for reporting situations that may constitute Transnational Bribery:

https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-de-Denuncias-Soborno-Internacional.aspx

The Superintendencia de sociedades has made available the following channels of denunciation in the event that acts of Corruption and Transnational Bribery committed by Colombian legal entities or branches in Colombia of foreign legal entities are identified.

- Report of allegations of Transnational Bribery to the Superintendencia de sociedades .

Transnational Bribery Reporting Channel available at the following link:

https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-de-Denuncias-Soborno-Internacional.aspx

- Report of complaints of Acts of Corruption to the Secretaria de Transparencia.

Channel for reporting acts of Corruption available at the following link:

<http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/porta-anticorrupcion>

- Requests for information from authorities.



Responses to requests for information on the PTEE made to the Company by the different competent authorities will be coordinated and dealt with through the Compliance Officer.

The Compliance Officer shall evaluate the response and the documents to be sent to the control entities. In the case of control entities such as the Superintendencia de sociedades and the Secretaria de Transparencia, the Compliance Officer may deliver, according to his criteria, all the necessary information for the corresponding review and verification.

14. SANCTIONING REGIME OF THE PTEE

14.1. Penalties and Procedure Applicable for their Imposition

In the event of non-compliance with any of the components of the PTEE, Alpina may impose labor sanctions on the Subjects of Compliance as a result of the investigation conducted by the Compliance Officer. The foregoing is without prejudice to the administrative or criminal sanctions imposed by the corresponding authorities.

For the purposes of the PTEE, the procedures and the staggering of faults will be taken into account in accordance with the provisions of the Internal Work Regulations implemented by Alpina.

15. CONSERVATION OF RECORDS AND/OR EVIDENCE

The supporting documentation of the program is located in a SharePoint provided by the company, where you can find documentation and information related to: counterpart linkage, training, disclosures and enhanced due diligence.

Regarding the procedures for archiving and conservation of documents related to International Business or Transactions, there is a repository in the foreign trade area, which is shared with the Customs agency, which will be kept for a period of 10 years.

16. Update and Dissemination of the PTEE

This program must be reviewed, updated and approved at least every two (2) years by the highest corporate body and/or when new legal or internal regulations must be considered.

Any changes will be communicated to all employees, as well as to the stakeholders to whom they apply.

17. Political Activities

Alpina observes strict political, religious and philosophical neutrality. Therefore, it is the Company's policy not to make financial contributions to political candidates, elected representatives, political parties or religious institutions.

Alpina also respects the personal political, religious and philosophical affiliations of its employees. However, these affiliations must not affect Alpina's activities or image, nor may they affect the company's neutrality in these matters.



18. ANTI-CORRUPTION CLAUSES IN ALPINA'S CONTRACTS

Alpina undertakes to ensure that in the execution of the contracts it enters into, the risk of Acts of Corruption or of the Contractors performing Acts of Corruption is limited as much as possible. To this end, all contracts entered into by Alpina with contractors or any third party or intermediary shall include clauses that protect Alpina and offer it legal remedies when its counterparty engages in Acts of Corruption.

Related Documents

Annex 1 PTEE DEFINITIONS	PTEE Definitions
Annex II	Transnational Bribery and Corruption Risk Identification Matrix
Annex III	Alpina segmentation procedure
Annex IV	Alpine Segmentation Matrix
Annex V	Code of Conduct Manual
Annex VI	Clarifying Annex to the Code of Conduct (Anti-Corruption, Anti-Bribery and Anti-Fraud)

Change Control

Note: It is the responsibility of the person responsible for the policy to ensure that the information contained in this document is constantly updated.

Change Control								
Version	Detail	Prepared by		Reviewed		Approved		Validity
		Name	Cargo	Name	Cargo	Name	Cargo	
1	Implementation	Crowe horwath		Gilberth Sanabria		N/A		16/12/2022 28/09/2023
2	Update	Gilberth Sanabria		Gilberth Sanabria		Maximum Corporate Body		28/09/2023 26/06/2024
3	Update	Gilberth Sanabria		Ana Maria Silva		Maximum Corporate Body		26/06/2024 To date