TRANSPARENCY AND BUSINESS ETHICS PROGRAM

PTEE

Compliance Management

Table of Contents

1. GENERAL

1.1. Introduction

The Transparency and Business Ethics Programme (hereinafter, the "PTEE") is aimed at collecting the best business practices, with the purpose of ensuring that our ethical values and principles prevail in all the behaviours of our workers and other Stakeholders. For these purposes, this PTEE is addressed to all of Alpina's counterparties, including internal workers and collaborators, suppliers, customers and other stakeholders linked to the Company.

The PTEE is adopted in full compliance with the provisions contemplated in Law 1474 of 2011, Law 1778 of 2016, External Circular 100-000011 of 2021 issued by the Superintendence of Companies, Law 2195 of 2022, as well as the regulations that modify or complement them, and the instructions given by the Superintendence of Transportation for companies in the transport sector, especially Resolution No. 14673 of 2025 and other provisions that add or replace it. As well as all the international conventions signed by Colombia, including the Inter-American Convention against Corruption of the Organization of American States (1997), the United Nations Convention against Corruption – UNCAC (2005) and the Convention of the Organization for Economic Cooperation and Development (OECD) to Combat Bribery of Foreign Public Officials in International Business Transactions (hereinafter, the "Anti-Corruption Provisions").

At Alpina, relationships with employees, suppliers, customers and other stakeholders are based on respect, responsibility and integrity as fundamental corporate principles, from which relationships based on trust and transparency are built. These principles guide the Company's conduct and are consolidated in this Transparency and Business Ethics Program, which includes the corporate values and establishes the necessary guidelines to guarantee high ethical standards and self-regulation.

1.2. Objective

The objective of this PTEE Manual (the "Manual") is to establish the guidelines and rules that all administrators, partners, collaborators, suppliers, allies and other persons subject to the Program, must comply with in their relationship with the different Alpina counterparts, as defined below.

Likewise, the purpose of the Manual is to prevent, identify and mitigate the risks of corruption and transnational bribery, as well as to define the stages, elements and methodologies necessary for their adequate control and management, in the development of the Company's corporate purpose.

1.3. Scope

This Manual is applicable to all shareholders, directors, partners, collaborators, suppliers, customers, allies and any person who, directly or indirectly, acts on behalf of or on behalf of Alpina, or maintains a relationship with the Company.

The policies, methodologies, definitions and procedures contained in this Manual are mandatory for the subjects to which it is applicable. Failure to comply with the provisions herein may give rise to the labor or contractual sanctions that may be applicable, including the termination of contracts, as well as legal actions of a criminal or administrative nature, in accordance with the seriousness of the conduct and the regulations in force.

2. REGULATIONS

2.1. National standards

a. Article 23 of Law 1778 of 2016 establishes the duty of the Superintendence of Companies to promote, in the companies subject to its supervision, the adoption of Transparency and Business Ethics Programs, as well as internal anti-corruption mechanisms, internal auditing standards, promotion of transparency and mechanisms for the prevention of Transnational Bribery conduct.

b. Numeral 3 of Article 86 of Law 222 of 1995 states that the Superintendence of Companies is empowered to impose sanctions or fines, successive or not, up to two hundred (200) SMMLV, on those who fail to comply with its orders, the law or the bylaws.

c. Numeral 28 of article 7 of Decree 1736 of 2020 assigns to the Superintendence of Companies the function of "instructing, in the manner that it determines, entities subject to its supervision on the measures they must adopt to promote transparency and business ethics in their business practices to have internal mechanisms for the prevention of acts of corruption (...)", so that there is more enterprise, more employment, and competitive, productive and lasting enterprises.

d. External Circular 100-00011 of 2021, issued by the Superintendence of Corporations.

e. Law 2195 of 2022, through which measures are adopted in terms of transparency, prevention and fight against corruption.

f. Law 2155 of 2021, Article 16, which establishes the definition of Final Beneficiary.

g. Resolution No. 14673 of 2025 of the Superintendence of Transportation, which adds Chapter 10 of Title V of the Single Circular on Infrastructure and Transportation and establishes obligations regarding Transparency and Business Ethics Programs for the supervised subjects of the transportation sector.

2.2. International norms and standards

As part of Colombia's efforts to combat corruption, an international legal framework has been adopted that includes, inter alia, the following conventions:

- 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. For example, the OECD Recommendation on Combating Foreign Bribery, adopted in 2009, urges Member States to encourage companies to develop and adopt appropriate internal controls, as well as ethics and compliance programmes or measures, in order to prevent and detect bribery of foreign public officials.

3. COMPLIANCE POLICIES

All Alpina's partners, administrators, collaborators, suppliers and other counterparties must take into account the following policies, aimed at preventing and mitigating the risks of corruption and transnational bribery:

a. General principles

Alpina rejects dishonest practices and corruption in all its forms, including extortion and bribery.

All operations, businesses and contracts carried out by Alpina must comply with the policies and procedures established in this Manual, as well as with the other internal rules that are applicable.

Alpina refrains from doing business or carrying out transactions with natural or legal persons whose ethical, reputational or commercial behavior is doubtful or incompatible with corporate principles.

b. Prohibition of improper payments and bribery

It is prohibited to offer, promise, deliver, solicit or accept, directly or indirectly, through intermediaries such as agents, consultants, contractors or similar third parties, payments in money or in kind, benefits, favors, employment contracts, advice or other advantages that may unduly influence the decision of a public official or an individual with respect to a procedure, business or action of interest to Alpina.

Any request for bribery, fraud or suspicious payment that is received by an employee must be reported immediately through the channels established by the Company.

The selection processes of contractors, consultants and independent professionals must be preceded by the corresponding due diligence procedures, in order to guarantee adequate knowledge of the third party and informed decision-making.

Senior managers fully support all employees and representatives who refrain from making improper payments, even if it means losing business opportunities.

c. Prohibition of Corporate Political Contributions

Alpina adopts a policy of prohibiting the financing of political campaigns, by virtue of which the Company does not make contributions, donations or contributions, direct or indirect, to political parties, political movements or candidates for elected office.

No donation, contribution or contribution made by the Company shall be intended to influence political decisions, obtain undue benefits or generate particular favors.

d. Relationship with public officials

The relationship with public officials and Government Entities requires special care and, therefore, the following are considered high-risk situations:

- Entering into a contract with a Government Entity.
- Carrying out any contact with public officials on behalf of Alpina.
- Alpina's support or participation in transactions with Government Entities.
- Obtaining government licenses, permits, or registrations in Alpina's name.

General guidelines:

In the framework of interaction with the public sector and state procurement, Alpina shall observe the principles of legality, transparency, integrity, free competition and objectivity, and shall adopt the necessary measures to prevent conduct such as collusion, unfair competition, falsification of public or private documents and non-compliance with contractual requirements.

The risks associated with public procurement and the relationship with public officials are identified within the general risk matrix of the PTEE, along with the controls defined for their prevention, detection and mitigation.

Rules of interaction with public officials:

In the processes of negotiation, processing, contractual management or definition of decisions with public sector entities:

- Efforts must be made to ensure that meetings or gatherings are held with the participation of more than one Alpina representative, leaving documentary evidence of their purpose, attendees and conclusions.

- No gifts, undue benefits, facilitation payments or any other incentive that may influence the actions of a public official may be offered, promised or delivered, directly or indirectly.

- All interactions must be aligned with the Code of Conduct and the PTEE, as well as with the applicable regulations.

Prohibited acts:

The following are considered acts of corruption, among others:

- Diverting resources for the purpose of committing acts of corruption.

- Unlawfully altering a contractual procedure in a public, private or special application process.

- Promising, offering or granting, directly or indirectly, undue benefits to third parties, including facilitation payments.

- Favouring, 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) or benefits from third parties in order to obtain personal advantages other than those derived from the contractual relationship with the Company.

e. Policy on the Prevention of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (LA/FT/FPADM)

Alpina expresses its express commitment to the prevention, detection and management of risks associated with money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction (AML/FT/FPADM), as an integral part of its culture of integrity and its Compliance Policies.

The Company has AML/FT/FPADM risk management systems implemented in compliance with the applicable regulations according to the corresponding supervisory regime, including the AML/FT/FPADM Self-Control and Comprehensive Risk Management System (SAGRILAFT), and the Money Laundering, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction (SARLAFT) Risk Management System in the transport sector. when required.

The policies, procedures and controls provided for in these systems are articulated with the Transparency and Business Ethics Program (PTEE) with regard to the prevention of corruption, transnational bribery and due diligence of counterparts.

All Compliance Subjects must strictly comply with the guidelines set forth in the applicable LA/FT/FPADM systems and in this PTEE Manual, report in a timely manner any unusual or suspicious operation through the channels provided by the Company and refrain from participating in transactions that may directly or indirectly facilitate this type of risk.

f. Lobbying policy

For the purposes of this Transparency and Business Ethics Program (PTEE), lobbying is understood to be any activity carried out by collaborators, administrators, third parties, advisors or guilds on behalf of Alpina, aimed at directly or indirectly influencing public or regulatory decisions that may affect the interests of the Company.

These activities may include, among others, participation in guilds, forums, congresses, talks or meetings with public or private actors, provided that they are carried out with transparency, respect for legality, integrity and in coherence with corporate values.

The pursuit of undue advantages, inappropriate influence on public decisions, the offering of hidden benefits, the use of privileged information or acting in situations of undeclared conflict of interest is expressly prohibited.

Persons who participate in lobbying or lobbying activities must fill out, before they are carried out, the declaration of conflict of interest form, in which they will report any personal, economic or employment relationship that may affect their objectivity vis-à-vis the public actors involved. Failure to make the declaration shall constitute a serious infringement of the PTEE.

3.1. Duties of the Company

- Any payment or disbursement of Alpina's resources to its contractors or collaborators, national or foreign, must be made through banking channels, where it is possible to track all movements and payments.

- Payments for services rendered abroad must comply with the Colombian exchange regime and be channeled through authorized banking entities or clearing accounts duly registered with the Bank of the Republic.

- All payments made to contractors or collaborators must be duly supported in the respective contracts and may be subject to audit by specialized firms, in order to verify their legality and avoid the diversion of resources or the concealment of improper payments.

3.2. Company Prohibitions

The Company may not order or authorize its employees to make payments that do not comply with the procedures described above.

3.3. Counterparty Engagement

a. Alpina will carry out the due diligence processes contemplated in this Manual and in the SAGRILAFT Manual to properly know its counterparties, in order to reasonably know their reputational, sanctioning (administrative, criminal and disciplinary) background, as well as their legal and accounting (financial) suitability, paying special attention to those counterparties whose final or related beneficiaries are Politically Exposed Persons (PEP).

b. Alpina will monitor its counterparts to identify warning signs.

c. All operations and business with counterparties must have sufficient documentary support, such as contracts, purchase orders or service orders.

d. Failure to comply with the PTEE policies and procedures by an employee will lead to the corresponding investigations and may result in the termination of the employment contract or the applicable sanctions.

3.4. Financial Management and Accounting Policy

Alpina's administrators, partners, collaborators and suppliers must guarantee at all times the integrity, accuracy and reliability of the accounting and financial information, which must reflect in a fair and reasonable manner all the operations carried out, in accordance with the applicable accounting and tax regulations.

It is strictly forbidden to engage in conduct aimed at hiding, changing, omitting or distorting accounting records in order to cover up improper activities or distort the true nature of a recorded transaction.

4. CODE OF CONDUCT

Alpina adopts the Alpina Group's Code of Conduct as the ethical framework that guides the actions of its employees, administrators, contractors and related third parties in the development of all its activities and business relationships. This Code is an integral part of this Transparency and Business Ethics Program (PTEE) and is mandatory for all Compliance Subjects.

The Code establishes the corporate values that govern the organizational culture, the guidelines for action against unethical conduct, the mechanisms for the management of ethical dilemmas and the reporting channels, and includes provisions related to the prevention of corruption, bribery, fraud and other compliance risks.

The Code of Conduct is mandatory for its recipients to know, comply with and apply, who must ensure that their actions are always framed within the rules set forth therein.

In line with the above, Alpina will develop awareness and training programs on ethics, compliance, transparency and anti-corruption within the framework of the Transparency and Business Ethics Program (PTEE), whose participation will be mandatory for employees, according to their role and level of exposure to risk.

5. ROLES AND RESPONSIBILITIES

The different persons responsible for the activities associated with the Transparency and Business Ethics Program (PTEE) will be in charge of the functions and responsibilities indicated below, in order to ensure their proper design, implementation, compliance and effectiveness, in accordance with Alpina's organizational structure and applicable regulations.

5.1. Functions of Alpina's Highest Corporate Body

a. Issue and define the Compliance Policy.

b. Define the profile of the Compliance Officer in accordance with the Compliance Policy.

c. Designate the Compliance Officer.

d. To approve the document contemplated by the PTEE.

e. Assume a commitment aimed at the prevention of C/ST Risks, so that the Company can conduct its business in an ethical, transparent and honest manner.

f. Ensure the supply of the economic, human and technological resources required by the Compliance Officer for the fulfillment of his work.

g. To order the pertinent actions against the Associates, who have management and administrative functions in the Company, the Employees, and administrators, when any of the above violates the provisions of the PTEE.

h. Lead an appropriate communication and pedagogy strategy to ensure the effective dissemination and knowledge of the Compliance Policies and the PTEE to Employees, Associates, Contractors (according to the Risk Factors and Risk Matrix) and other identified stakeholders.

i. Establish the criteria for the engagement of counterparts who have the status of Politically Exposed Persons (PEP).

5.2. Functions of the Legal Representative

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

a. Submit to the Compliance Officer, for approval by the highest corporate body, the proposal of the PTEE.

b. Ensure that the PTEE is articulated with the Compliance Policies adopted by the highest corporate body.

c. Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the PTEE.

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

e. To certify, when required by the Superintendence of Corporations, compliance with the provisions contained in this Manual.

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

5.2.1. Incapacities and incompatibilities of the Legal Representative

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

5.3. Compliance Officer

5.3.1. Features

a. To present with the legal representative, for approval by the highest corporate body, the proposal of the PTEE.

b. To submit, at least once a year, reports to the highest corporate body. At a minimum, the reports must contain an evaluation and analysis of the efficiency and effectiveness of the PTEE and, if applicable, propose the respective improvements. Likewise, demonstrate the results of the Compliance Officer's management and the Company's administration, in general, in compliance with the PTEE.

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

d. To ensure effective, efficient and timely compliance with the PTEE.

e. Implement a Risk Matrix and update it according to the Company's own needs, its Risk Factors, the materiality of the C/ST Risk and in accordance with the Compliance Policy.

f. Define, adopt and monitor actions and tools for the detection of C/ST Risk, in accordance with the Compliance Policy to prevent C/ST Risk and the Risk Matrix.

g. Ensure the implementation of appropriate channels to allow anyone to report, confidentially and securely, about breaches of the PTEE and possible suspicious activities related to Corruption.

h. Verify the proper application of the whistleblower protection policy that the Company has established and, with respect to employees, the workplace harassment prevention policy in accordance with the law.

i. Establish internal investigation procedures in the Company to detect breaches of the PTEE and acts of Corruption.

j. Coordinate the development of internal training programs.

k. Verify compliance with the Due Diligence procedures applicable to the Company.

l. Ensure the proper filing of documentary supports and other information related to the management and prevention of C/ST Risk.

m. Design the methodologies for classification, identification, measurement and control of C/ST Risk that will be part of the PTEE.

n. To carry out the evaluation of compliance with the PTEE and the C/ST Risk to which the Company is exposed.

ñ. To make the Report of Suspicious Transactions (ROS) to the Financial Information and Analysis Unit (UIAF).

or. Report to the Secretariat of Transparency of the Presidency of the Republic those cases that may be associated with corruption and transnational bribery.

5.3.2. Compliance Officer Requirements

a. Have sufficient knowledge of C/ST Risk management and understand the day-to-day course of the Company's activities.

b. Have the support of a human and technical work team, according to the C/ST Risk and the size of the Company.

c. Not belong to the administration, corporate bodies or belong to the tax audit body (act as a tax auditor or be linked to the tax audit company that performs this function, if applicable) or who performs similar functions.

d. When the Compliance Officer is not linked to the Company, this natural person may or may not be linked to a legal entity.

e. Not serve as a Compliance Officer, principal or alternate, in more than ten (10) Companies. To serve as the Compliance Officer of more than one Obligated Business, (i) the Compliance Officer must certify; and (ii) the body that designates the Compliance Officer must verify that the Compliance Officer does not act as such in companies that compete with each other.

f. When there is a business group or a declared control situation, 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 it up.

g. Be domiciled in Colombia.

h. Have the ability to make decisions to manage C/ST Risk and have direct communication with, and depend directly on, the highest corporate body in the event that there is no board of directors.

5.3.3. Compliance Officer Disqualifications and Incompatibilities

A person who is incapable or incompatible to do so may not exercise the position of Compliance Officer. For this reason, the following will be grounds for the Compliance Officer to be unable to take office, or having done so, he must cease to exercise the position:

- Belong to the administration or corporate bodies, or to audit or internal or external control (tax auditor or linked to the tax audit company that performs this function, if applicable) or whoever performs similar functions or takes their place in the Company. This prohibition does not extend to those who support the work of the internal audit bodies.

- To serve as a Compliance Officer for more than one Obligated Business, (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.

5.4. Functions of the Tax Auditor's Office

The tax auditor must report to the competent authorities any act of corruption that he or she becomes aware of in the performance of his or her duties. In fact, Article 32 of Law 1778 of 2016, which adds numeral 5 of Article 26 of Law 43 of 1990, imposes on tax 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 position. Still, despite professional secrecy.

5.4.1. Inabilities and incompatibilities of the Statutory Auditor

Due to the difference in the roles of the Statutory Auditor and the Compliance Officer, the Statutory Auditor shall not be appointed as a Compliance Officer.

5.5. Roles of all Contributors

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

Conflicts of interest that may arise between the different parties related to the PTEE, in which personal interests are opposed to the interests of the Company and that may generate a personal, economic or commercial benefit for one of the parties to the detriment of the other, or affect transparency, equity and responsibility in the decision-making process, they must be declared and managed in accordance with the guidelines established in the Code of Conduct and with the applicable regulations.

6. ELEMENTS OF THE PTEE

6.1. PTEE Design and Approval

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

- The approval of the PTEE is carried out by means of minutes of the Company's Highest Corporate Body.
- For the design of the PTEE, the risks of Transnational Bribery to which the Company is exposed were identified, considering its size, industry or economic sector, geographical 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 appropriate procedures and controls and assigning specific functions to the Company's internal collaborators.
- By means of said minutes of the Highest Corporate Body, it was established that the PTEE and the guidelines contained therein will be mandatory application and compliance by the Company, its Internal Collaborators and other Stakeholders.

6.2. Disclosure

In order to effectively prevent bribery, transnational bribery and corruption, the Compliance Officer or his designee, will carry out the following actions to disseminate the Compliance Policies and the PTEE:

a. Through a communication by email, corporate website or whatever it deems appropriate, at least once a year addressed to employees and associates, indicating the obligation of administrators to prevent corruption, bribery and transnational bribery. Communications will also be made on: financial controls policy, delivery of gifts and donations, complaint channels, sanctions for non-compliance with the PTEE.

b. It will publish the Handbook in a place accessible to counterparts.

c. In the formalization of contractual relations with administrators, partners, collaborators and new suppliers, it will publicize the anti-corruption commitment and invite its compliance.

6.3. Training

In order to ensure that the Transparency and Business Ethics Program (PTEE) is properly understood by the employees obliged to comply with it, the Compliance Officer will coordinate, on an annual basis, training plans aimed at providing the necessary tools for compliance, according to the level of risk to which the different counterparties and activities of the Company are exposed. such as the relationship with state contracting or interaction with countries with a high risk of transnational bribery.

Within the framework of such training and dissemination activities, the obligation of administrators and collaborators to prevent acts of corruption will be recalled. The annual disclosure of information must contain, at least:

- The financial controls policy,
- The delivery of gifts and donations,
- The whistleblowing channel and the sanctions applicable to employees and administrators.

The main objectives of the training on transparency and the fight against corruption will be:

a. To raise awareness of the risks of corruption and transnational bribery to which the Company is exposed.

b. Update employees, administrators, and other counterparties when circumstances require it, in response to the changing nature of the specific risks of corruption.

Therefore, greater attention should be given to individuals or businesses that are most exposed to such risks, such as those that participate in state contracting processes or in distribution businesses in countries or geographical areas with a high risk of transnational bribery. Likewise, the training may be extended to contractors identified by the Compliance Officer, as established by the Risk Matrix and the Compliance Policy.

6.4.System Audit

Within the annual audit plan, the verification of compliance with the PTEE will be carried out, in order to serve as a basis for both the Compliance Officer and the Company's management to determine the existence of deficiencies of 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 highest corporate body.

7. MRS AND ACQUISITIONS PROCEEDINGS

When Alpina participates as an acquirer in the context of mergers, purchase of assets, shares, quotas or parts of interest, before initiating the transaction, it will carry out the corresponding due diligence on the business and the parties involved. Such due diligence shall include, at a minimum, the verification on restrictive lists of the natural and legal persons involved, as well as their legal representatives, associates and final beneficiaries.

In addition, the Company will adopt the necessary measures to prevent the occurrence of acts of corruption or bribery, including transnational bribery, during the development of the operation, through the inclusion of contractual clauses, the review of financial information and the conservation of the supports and records associated with the transaction.

8. REMUNERATION AND PAYMENT OF COMMISSIONS TO COUNTERPARTIES

Alpina will remunerate the work performed by its collaborators in accordance with the provisions of the respective employment contracts and in compliance with the applicable labor legislation. Likewise, the Company will only recognize to its counterparties the remunerations, fees or commissions that are duly agreed in the contracts signed for the provision of services or the supply of goods, abstaining from making additional payments or payments that are not contractually justified.

All payments made by Alpina to collaborators or counterparties must be made through authorized banking channels, so that it is possible to guarantee the traceability of all movements.

All payments made to counterparties must be duly supported in the values stipulated in the corresponding contracts and/or purchase orders, and may be subject to review or audit by Alpina or specialized third parties, in order to verify the legality of the payments, the non-diversion of resources, and the non-existence of payments to unauthorized third parties or without contractual justification.

No Alpina employee may order, authorise or make payments that do not comply with the provisions of this PTEE Manual or other internal policies of the Company.

9. CONFLICTS OF INTEREST

For the purposes of this Transparency and Business Ethics Program (PTEE), a conflict of interest is understood to be any situation in which the direct or indirect personal interests of employees, administrators, associates or other parties related to Alpina may interfere with the objective and impartial exercise of their functions or with the interests of the Company.

All employees, administrators, associates and others linked to Alpina have the obligation to disclose in a timely manner any situation that may generate a conflict of interest, in accordance with the provisions of this Manual, the Code of Conduct and the applicable regulations.

The declaration of conflicts of interest must be made through the formats and through the channels defined by the Company. The management, analysis, mitigation and monitoring of the declared conflicts will be the responsibility of the Compliance Department, or whoever takes its place, in accordance with the established procedures, guaranteeing the transparency of the process and the adoption of the corresponding preventive or corrective measures.

The detailed development of the procedure for the declaration, analysis, management and registration of conflicts of interest, as well as the applicable typologies, and the consequences derived from their materialization, is established in the Alpina Group Code of Conduct.

9.1. Employment of former public officials

Alpina will adopt controls to prevent the hiring of former public officials when there are disqualifications, incompatibilities or legal restrictions after retirement from public service, in accordance with the applicable regulations.

In particular:

- As part of the linking processes, an express declaration will be required on recent ties with state entities, on whether the person has held public office during the last few years, indicating the entity, the position held, the functions performed and the date of retirement from public service.
- When it is identified that a candidate has been a public servant, the Compliance Directorate and the legal area will verify the existence of disqualifications, incompatibilities or legal restrictions in force for their employment, in accordance with the applicable regulations.
- In the event that any period of legal restriction is in force, Alpina will evaluate the measures to be adopted, including the possibility of refraining from formalizing the relationship until the term provided for in the law is fulfilled.

All verifications carried out and decisions adopted must be duly documented and archived as part of the due diligence and conflict of interest management process.

10. DONATION PROCEDURE

10.1. Philanthropic Giving

Philanthropic donations correspond to gifts in money or in kind, such as goods, sponsorships, use of the Company's facilities, resources or employee time, granted to non-profit or charitable organizations, for social, community or philanthropic purposes.

Contributors should be vigilant that philanthropic donations are not used as a mechanism to cover up acts of corruption, bribery, or other improper purposes. Consequently, a donation will only be allowed when it complies, at least, with the following guidelines:

- The identity of the recipient, its final beneficiary and the destination or specific purpose of the donation is fully known, including the program, project or beneficiary population to which it will be directed.
- The recipient is a legally constituted, registered or recognized non-profit organization.
- The donation is not made to natural persons.
- The donation complies with all legal requirements.
- The donation is properly documented
- The donation is not conditional on the performance or omission of an action by any third party.
- The donation is not intended to secure business, influence decisions, or gain undue advantage.

In no case will political donations or contributions of a political nature be made.

10.2. Approval and due diligence of donations

Prior to making any donation, you must ensure:

- Knowledge of the recipient and beneficiary of the donation.
- Prior evaluation and approval by the Sustainability area.
- Before authorizing any donation, the approver must ensure the due diligence of the recipient including their reputation and document it.
- If red flags are identified, intensified due diligence must be carried out and compliance information of the receiving entity, among others, must be verified.
- That the resources are transferred to bank accounts in the name of the receiving entity and in the corresponding country, avoiding payments to unauthorized third parties.

10.3. Purpose of Donations

The purpose of all donations must be framed in the strategic focuses for Sustainability and the relevant issues described in the Sustainability procedure.

Any donation made outside of the relevant matters described must have an analysis that justifies its pertinence, relevance and impact, and will require the express approval of the Executive Directorate.

10.4. Verification and Auditing of Donations

The Sustainability Directorate will have the power to verify and intervene in the processes related to donations, in order to guarantee compliance with these guidelines.

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

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

11. RECEIVING GIFTS, INVITATIONS, ENTERTAINMENT AND HOSPITALITY

The exchange of small gifts, invitations or personal attentions can be part of the usual cultural and commercial practices. In general, these practices are permitted as long as they conform to the limits, criteria and conditions set out in this Manual.

Alpina may offer promotional gifts and hospitality in order to strengthen relations with third parties, in accordance with the rules of common acceptance, provided that they are timely, moderate, infrequent, not excessive and do not compromise the objectivity or good judgment of its employees.

Under no circumstances may Alpina's employees offer, deliver, solicit or accept gifts, invitations, hospitality or hospitality, regardless of their value, when there is an intention to unduly or dishonestly influence a decision, obtain an inappropriate benefit, access confidential information or affect impartiality in the performance of their duties.

The gifts, entertainment, and hospitality that may normally be accepted are those whose economic value does not exceed USD 100, and whose nature does not generate preferences, undue commitments or expectations of preferential treatment vis-à-vis the giver or the entity he represents.

Offers of trips, events or similar activities for business reasons must have, in any case, the prior approval of the Vice Presidency of the corresponding area, the Compliance area and the Purchasing area, in accordance with the established guidelines.

Under no circumstances shall the following be acceptable:

- Money or gift vouchers.
- Stock or stock options.
- Any gift that may compromise the employee's reputation, good judgment or independence.
- Loans.
- Consultancies.
- Those that violate the law, local regulations or the rules of the recipient or Alpina.

When an employee receives or offers a gift, attention, hospitality or entertainment, they must evaluate whether such situation is consistent with this Manual, the Code of Conduct and Alpina's internal policies, considering the value, frequency, intention of the third party, the business relationship and the potential reputational impact.

In case of doubt, the employee must refrain from accepting or offering the benefit and consult the Compliance Department beforehand.

In any case, Alpina employees must refrain from accepting gifts, gratuities, attentions or preferential treatment that may have an inappropriate intention to influence the performance of their functions or compromise their professional independence and responsibility towards the Company. Only those gifts that, in accordance with the uses and customs, correspond to simple hospitality or promotional material and whose economic value does not exceed the established limit will be acceptable.

12. POLITICAL ACTIVITIES

Alpina observes a 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 respects the personal political, religious, and philosophical affiliations of its employees. However, such affiliations must be maintained in the personal sphere and must not affect the activities, decisions, image or neutrality of the Company.

13. DUE DILIGENCE PROCEDURES

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

13.1. Due Diligence

Due diligence refers to the initial and periodic review that must be made on the legal, accounting, or financial and reputational aspects related to a third party, business or transaction, in order to identify and evaluate the C/ST risks that may affect the Company. This process 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 carrying out the linkage, through the request for documentation and completion of the knowledge forms.

b) **Carry out the study of the information and supporting documentation:** The person in charge of the liaison will carry out the study of the information and documentation provided by the third party. It must be ensured 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 that the supplier will carry out in favor of Alpina corresponds to the social activity registered by the third party.

c) Complete external detection and due diligence reports: The Data Governance area must consult binding and control lists, through the tool provided by the Company, prior to the linking of the counterparty, leaving the respective support generated by the current tool.

d) Evaluate the file for the approval of linking: If at the time of verification there is any match with the binding or control lists, Data Governance must suspend the creation of the counterparty, generate the report of the identified matches and send it by email to the Transparency and Compliance area, for the corresponding analysis.

13.2. Intensified Due Diligence

Enhanced due diligence refers to the additional steps the Company takes to assess and mitigate the risks associated with certain business transactions or relationships that are considered to be high-risk. This level of diligence is necessary when the inherent risks are higher than normal due to factors such as the nature of the transaction, the counterparty's profile, or the jurisdiction involved

It is required when a commercial or customer relationship presents characteristics that increase the level of risk, usually (but not always) these are derived from the result of verification of binding and control lists, when relevant coincidences associated with natural or legal persons linked to crimes related to money laundering, financing of terrorism or financing of the proliferation of weapons of mass destruction are identified.

Characteristics of Enhanced Due Diligence:

- Deeper risk assessment: This involves a more detailed review of the counterparty's background, including obtaining additional information about their identity, the nature of their business activities, and the source of funds.
- Information validation: The information provided by the counterparty is more thoroughly verified, using independent sources, internal tools and search in public or press media when possible.
- Higher-level approval: The Company has a procedure formalized by means of minutes approved by the Compliance Officer, which establishes the criteria and guidelines for the review and approval of counterparties subject to intensified due diligence.

  This procedure defines the cases or alerts that must be escalated directly to the Compliance Officer, as well as the guidelines for the evaluation of the others, ensuring agile, coherent and traceable management in accordance with internal policies.

- Continuous monitoring: Requires more frequent and detailed monitoring, with analysis of operations, unusual behaviors, profile changes and other relevant variables.

- Detailed due diligence report: In cases that must be escalated to the Compliance Officer, a consolidated report will be prepared with all the information collected and the corresponding analysis, which will be evaluated before issuing the respective concept or authorization.

  The other intensified due diligence evaluations will be documented and kept in the DDI repository, in accordance with the established procedure and the criteria approved by the Compliance Officer.

- The enhanced due diligence applied to PEPs will extend to: (i) their spouses or permanent partners; (ii) their relatives up to the second degree of consanguinity, first degree of affinity and first civil degree; and (iii) its close associates.

13.3. PEP Counterpart Linking

Once it is identified that a counterparty, applicant or proponent holds the status of Politically Exposed Person (PEP), or that its final beneficiary has such status, the Intensified Due Diligence procedures must be applied. These procedures, in addition to consulting restrictive and control lists, incorporate additional controls aimed at ensuring greater knowledge of the counterparty and the establishment of stricter controls on its operations.

- Once the area in charge of linking the counterparty identifies the PEP status, it must guarantee that the provision of the information and support required by Alpina to know the PEP status is complete.
- The consultation should be carried out on restrictive and control lists, leaving support for the consultation.
- The internal report must be made to the Transparency and Compliance area, which will proceed to carry out the Intensified Due Diligence, making sure to identify and verify the identity of the PEP, as well as the related persons, when applicable.
- The result of the Intensified Due Diligence must be sent to the Compliance Officer for analysis and the corresponding authorization or not of the linkage, as the case may be.

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

- That it does not coincide in restrictive and control lists (related to C/ST crimes), analysis of past and current investigations, convictions for corruption, bribery and other related crimes.
- Intensified Due Diligence (Evaluate the perception of legal background, reputations in the media and in the consultations that are made individually).
- Determine if the counterparty's sources of income are legitimate
- Assess the level of the PYP position and its duration. Example: (Minister, Mayor, Mayor) since a higher-level position can generate a higher level of risk.

- Approval by the Compliance Officer.

13.4. Contractual controls with suppliers

In order to ensure compliance with the PTEE, Alpina will include the following provisions in the contracts it enters into with its suppliers, as appropriate:

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. Clause of unilateral termination of the contract or agreement, in case the supplier engages in conduct related to corruption, transnational bribery or non-compliance with this Manual.
c. Express authorization in favor of Alpina to carry out, with respect to the supplier, its administrators, partners and final beneficiaries, the due diligence procedures necessary to verify reputational, sanctioning and compliance records in matters of corruption and bribery,
d. No provision of false, incomplete or inaccurate information.
e. Express prohibition of incurring, offering, promising or making improper payments, gifts, bribes or any other illicit payments, in accordance with Alpina's policies and guidelines.
f. Confidentiality obligations, including the legal and contractual consequences arising from their non-compliance, as well as from the breach of Alpina's information systems.
g. Acknowledgment and acceptance by the supplier of the Company's policies related to the delivery and receipt of gifts, gifts, gifts, travel expenses, hospitality or courtesies not allowed.

14. RISK MANAGEMENT

Corporate risk management is the process by which an organization identifies, analyzes, and evaluates the risks to which it is exposed, in order to understand their impact and relevance on processes, and manage them appropriately through the implementation of controls, the assignment of responsibilities, and the execution of treatment plans.

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 for risk management (Version of August 6, 2018).

Information related to risk management, including the identification of events and risk factors, their measurement, defined controls and monitoring activities, can be viewed in the annex "PTEE – Alpina Risk Identification Matrix".

14.1. Risk Identification

Alpina recognizes that, in the development of its corporate purpose and its business activities, it may be exposed to various risks, which may materialize through its relationships with customers, suppliers, strategic allies, internal collaborators, shareholders and, in general, with all its Stakeholders.

The main risks identified for the purposes of the Transparency and Business Ethics Program (PTEE) are the following:

- Legal Risk: Refers to the risk that arises due to violations and non-compliance with laws and other regulations issued both nationally and internationally, which may lead to the Competent Authorities initiating processes and investigations against the Company, any Internal collaborator or any third party involved. Legal risk may also lead to disciplinary proceedings within the Company.

  This risk includes, among others, the possibility of incurring economic sanctions or any other type imposed by competent authorities, national or foreign, as well as the opening of internal investigations or disciplinary proceedings for the commission of conduct contrary to this PTEE, the Company's anti-corruption and anti-bribery policy or applicable regulations.

- Reputational Risk: This refers to the possibility of generating a negative, unfavorable or counterproductive perception of the Company, its subsidiaries, internal collaborators or related third parties, which may cause loss of customers, affect market confidence, decrease in income or the initiation of judicial and/or administrative processes.

- Risk of Contagion: This refers to the risk that the Company's improper actions may affect or extend to its subordinates (if any), shareholders, internal collaborators, suppliers or related third parties. Similarly, this risk is configured when the actions of an internal collaborator, supplier or third party have a negative impact on the Company.

- Financial Risk: Refers to the risk of economic loss to the Company as a result of inadequate, irregular or improper practices in financial management, including those carried out by internal employees.

14.2. Identification of Risk Factors for Corruption and Transnational Bribery (C/ST)

For the purposes of determining the risk factors, Transparency International, Transparency for Colombia[1] and the OECD[2] were taken as sources.

14.2.1. Risk factors

At this stage, the risks of Corruption and Transnational Bribery are recognized. In particular, the risks related to the recruitment, admission or hiring of employees, senior managers, associates and contractors and those related to the management of payments in the company are identified.

[1] National Transparency Index – Results 2015 – 2016.

[2] OECD Foreign Bribery Report – An Analysis of the Crime of Bribery of Foreign Public Officials 2014.

In order to recognize the risks of Corruption and Transnational Bribery, the risk factors must be classified taking into account the following aspects:

14.2.2. Country risk

For the purposes of Transnational Bribery, it refers to nations with high rates of perception of corruption, which are characterized, among other circumstances, by:

- 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.
- The lack of transparent policies on public procurement and international investment.

Persons responsible for establishing international business or transactions with third parties located in countries that have these characteristics must review and update, annually, the information of these counterparties, in accordance with the due diligence procedure provided for this purpose.

In addition, the persons in charge of linking counterparties must have as a fundamental guideline for this risk factor the corruption perception indices of Transparency International and the list of countries, jurisdictions, domains, associated states or territories as non-cooperative and with low or no taxation ("tax havens") provided for in Article 1.2.2.5.1. of Decree 1496 of 2024 and any regulation that adds, modifies or replaces it. These updates do not constitute a material 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 with special diligence and strictly observe the provisions of this PTEE Manual.

14.2.3. Economic sector risk

According to the reports prepared by the OECD, there are economic sectors that present a greater exposure to the risk of corruption. In this regard, Alpina must evaluate the level of risk taking into account the economic sector to which the Company belongs, as well as the sectors in which its suppliers, contractors and other counterparties operate through which legal transactions are executed.

Additionally, the level of risk increases in countries with high rates of perception of corruption and, under certain circumstances, when there is frequent interaction between the Legal Entity, its Employees, Senior Managers or its Contractors with Foreign Public Servants. Likewise, regulatory environments characterized by the requirement of multiple permits, licenses, and authorizations can facilitate the occurrence of corrupt practices aimed at streamlining procedures.

<u>Red flags</u>:

- Failure to conduct due investigation into complaints received through the channels provided for this purpose by the Company.
- Offering hospitality, donations or gifts in order to benefit the Company or a collaborator in the name or representation of ALPINA.
- Carrying out operations, businesses or contracts in economic sectors that have a high rate of corruption and bribery.
- Risk of conflicts of interest arising from the size, scope and geographical presence of the Company.
- Offering undue benefits to favor the Company in import, export, participation in public or private tenders, administrative procedures, judicial processes or any action that contravenes ethical principles and internal policies.
- Establishing or maintaining links with assets (financial, movable and immovable property) on which precautionary measures have been decreed in criminal proceedings or forfeiture of property related to crimes of corruption or transnational bribery.

14.2.4. 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 to carry out 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 that maintain close ties with officials of the high government of a given country, especially in the context of an international transaction, is considered high risk.

<u>Red flags:</u>

- To benefit third parties (communities, municipalities, etc.) for the development of social or philanthropic investment projects that the Company intends to implement.
- Link or create clients that are related to corruption or transnational bribery conduct, or that are referenced in restrictive lists.
- Selection and linking of suppliers that are related to crimes of corruption and transnational bribery, including those that appear on restrictive lists or for which, in the process of updating, relevant criminal news or alerts are identified.
- Linking human talent that has some type of relationship with corruption or transnational bribery, that is reported on restrictive lists or against which, in updating processes, relevant criminal news is identified.
- Directly and indirectly linking Politically Exposed Persons (PEPs) without applying the reinforced procedures of knowledge, due diligence or trusting in their condition or position.
- Establish or maintain commercial ties with natural or legal persons who purchase the company's products abroad and who are related, investigated or linked to transnational corruption or bribery activities.

- Omitting, by the supervisor or whoever takes his place, the application of contractual clauses, sanctions or policies provided for in contracts entered into with suppliers or contractors.
- 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.
- Disclose privileged information to a third party regarding activities related to the transportation and marketing of the Company's products.
- Linking or maintaining a relationship with natural or legal persons related to the operation of parades that are linked to transnational corruption or bribery activities.
- Carry out factoring or reverse factoring operations with persons related to corruption or transnational bribery.
- Diversion of resources in a personal capacity, inadequate payments to third parties and unjustified expenses.
- Omitting the registration of purchase, sale or payment operations that give rise to tax liability.
- Intentional act by one or more management individuals, employees, or third parties that results in the mispresentation of financial statements, including falsifying or altering records or documents, embezzlement of assets, deleting or omitting the effects of transactions in records or documents, recording transactions without substance, or misapplying accounting policies.
- Concealing, altering, or restricting information in investigative processes carried out by state or government entities.
- Absence of permanent monitoring of the movements of money paid or received in cash.
- Making inappropriate use of the money allocated to petty cash.
- Intentional use of the company's assets for activities that are not permitted, for one's own benefit or that of third parties.
- Intentionally authorizing payments for activities carried out or goods received without their due support or without complying with the technical and quality requirements demanded, in order to obtain their own benefit or that of a third party.
- Favoring the hiring of personnel without complying with the established procedures, in order to obtain an undue benefit.
- Alteration, distortion or deletion of the payroll register.
- To constitute real rights with owners, possessors, holders or occupants that may affect the reputation of the Company.
- Financing of political campaigns to achieve one's own benefit on behalf of the Company.

14.3. Measuring the risk of corruption and transnational bribery

Once the risks are identified through the management methodology, a mechanism has been defined that allows the level of severity of the risk to be measured through the determination of the probability of occurrence and the impact in the event of materialization, this allows establishing the level of risk in the development of the Company's activities. which can be evidenced in the annexes *"Risk Identification Matrix and Transnational Bribery" and "Alpine Segmentation Procedure"*.

14.4. Control and monitoring of compliance and PTEE policies

Given the complexity and changing nature of the legal relationships with state entities or the international or national business or transactions carried out by Alpina, the risks of corruption and transnational bribery that Alpina may face will also change. Therefore, the Company, through the Compliance Officer, must evaluate and implement the techniques it deems most appropriate to verify and periodically 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 sense, Alpina must take into account the legislative and regulatory changes that occur in the different jurisdictions where it operates, as well as any other change 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. The supervision by the Compliance Officer regarding the management of the risk of corruption and transnational bribery in legal relations with administrative entities or in international or national business or transactions in which Alpina participates. To this end, the administrators must put in place mechanisms that allow them to verify the effectiveness of the procedures aimed at preventing any act of corruption.

b. The periodic performance of Compliance Audits and Due Diligence procedures, as provided by the Compliance Officer.

- Within the monitoring routines of the program, the commissions within the commercial area for the result of sales will be taken into account, which will be analyzed by channels and depending on whether the variation generates a warning signal, a more detailed analysis will be carried out on a semiannual basis.
- Donations will be monitored by a 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 behavior analysis will be carried out every six months with the basis provided by the accounting area and depending on the behavior if it is out of the average, a more detailed analysis of each case will be carried out.
- For the correct application of the accounting policies, the accounting records and controls defined in the annex *"Matrix for the identification of risks of corruption and transnational bribery" will be taken into account.*
- Payments will be monitored by means of sampling payments that Alpina makes abroad, on a semi-annual basis.

15. WARNING SIGNS

The warning signs correspond to situations, facts or behaviors that Alpina identifies and that must be known by partners, administrators and collaborators, as they may evidence atypical situations that require further analysis, in order to determine if situations of bribery and/or corruption have occurred or could occur. Any warning signs must be reported immediately to the Compliance Officer, or within a reasonably short period of time from the time they become known.

Without prejudice to others that may be identified in the course of the operation, the following warning signs are considered, among others:

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

1. Invoices that appear to be false, do not reflect the reality of a transaction, are inflated, or contain excess discounts or refunds.
2. Operations abroad whose contractual terms are highly sophisticated.
3. Transfers of funds to countries considered to be tax havens.
4. Operations that do not have a logical, economic or practical explanation.
5. Operations that are outside the ordinary course of business.
6. Transactions where 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 that do not exist.

In the corporate structure or corporate purpose:

1. Existence of complex legal structures, national or international, that do not present reasonable commercial, legal or tax benefits, or the holding of legal entities without a defined commercial objective, especially when they are located abroad.
2. Legal entities with structures where there are national trusts, 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 development of the business can be considered as "paper" entities, that is, that reasonably do not fulfill any commercial purpose.
5. Companies declared as fictitious suppliers by the DIAN.
6. Legal entities where their Final Beneficiary is not identified.

In the analysis of transactions or contracts:

1. Frequently resort to consultancy contracts, brokerage contracts and the use of *joint ventures*[3].
2. Contracts with suppliers or state entities that, despite their appearance of legality, do not reflect precise contractual duties and obligations.
3. Contracts with suppliers that provide services exclusively to a single client.
4. Unusual gains or losses in contracts with suppliers or state entities, or significant changes without commercial justification.

[3] A joint venture is an agreement by virtue of which two or more firms join, combine their resources, and integrate part of their operations, in order to achieve certain business goals. The most common types of joint ventures in the business world are: research and development, production, marketing and sales, purchasing and networking.

5. Contracts that contain variable remuneration that is unreasonable or that includes payments in cash, in kind or through virtual assets[4].
6. Payments made to Politically Exposed Persons (PEPs) or to people close to them, without a clear and documented justification.
7. Payments to related parties (associates, collaborators, subordinate companies, branches) without apparent justification.

16. SEGMENTATION MODEL

A methodology was established to carry out the segmentation of the different risk factors of Corruption and Transnational Bribery (C/ST), with the aim of determining those segments that, according to their level of risk, require greater frequency and greater detail in monitoring, see annex *"Alpine segmentation procedure" and "Alpine segmentation matrix"*.

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

- Low: rating 1.
- Moderate: rating 2.
- Intermediate: grade 3.
- High: Rating 4.
- Critical: Rating 5.

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

Monitoring Table

LA/FT/FPADM -C/ST Risk Profile	Rating	Monitoring
1 - Low Risk	0, < 2	
2 - Moderate Risk	>2 < 4	Annual
3 - Intermediate Risk	>4.1< 5	
4 - High Risk	> 5.1 < 6	Semi-annual
5 - Critical Risk	>8 < 10	

The segmentation matrix will be reviewed annually of the variables to examine whether it effectively offers knowledge about the third party.

[4] Numeral 2 of External Circular 100-000016 of 2020 defines a virtual asset as *"the digital representation of value that can be marketed 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."*

The compliance area may additionally include another factor to materiality that allows for more knowledge of the third party, its environment and economic activity.

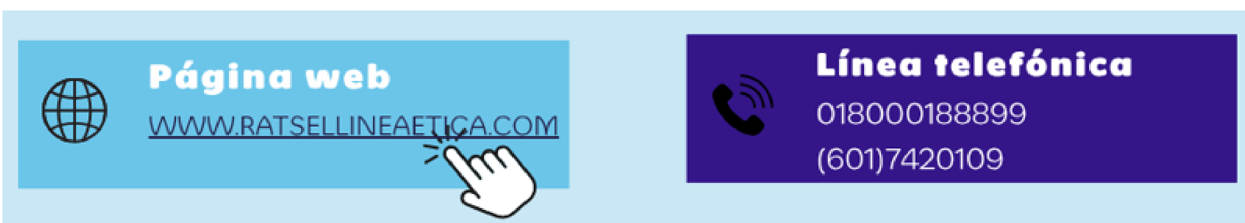
17. WHISTLEBLOWING PROCEDURE

17.1. Whistleblowing channel

Alpina makes available to Compliance Subjects the Ethics Hotline, as an official communication mechanism through which they can contact the Compliance Officer to resolve concerns related to the scope, application or interpretation of the PTEE, as well as to report, in good faith, confidentially and without fear of reprisals, any irregular conduct or possible non-compliance in the following matters:

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

Employees, Suppliers, Contractors and Senior Managers may send their communications related to the PTEE confidentially, in good faith and without fear of reprisals, to the Compliance Department, using the following channels:



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

Compliance Subjects must be aware that it will be a violation of the PTEE not to report or report actions that they know of and that have been carried out by any other compliance subject, or when they refuse to cooperate in the investigations that arise on the occasion of a complaint.

Alpina will not adopt any type of retaliation against Compliance Subjects who, in good faith, report or denounce conduct that may constitute a violation of the PTEE or the Company's internal policies, through the channels provided for this purpose. The Compliance Officer will adopt the pertinent measures to protect the whistleblower and will verify that no workplace harassment behaviors are undertaken against the complainants.

17.2. External reporting channels

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

- Report of Transnational Bribery Complaints to the Superintendence of Companies

Transnational Bribery Complaints Channel available at the following link:

https://www.supersociedades.gov.co/es/web/asuntos-economicos-societarios/denuncias-soborno-transnacional

- Report of complaints of Acts of Corruption to the Secretariat of Transparency

Channel for Complaints of Acts of Corruption available at the following link:

https://portal.paco.gov.co/index.php?pagina=denuncie

17.3. Information requests from authorities

Responses to requests for information on the PTEE made to the Company by the different competent authorities will be coordinated and addressed 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 those control entities such as the Superintendence of Companies, the Superintendence of Transport and the Secretariat of Transparency, it may deliver according to its criteria all the information necessary for the corresponding review and verification.

17.4. Report 75 – SAGRILAFT AND PTEE

The Company must submit to the Superintendence of Companies Report 75 – SAGRILAFT and PTEE, in accordance with current regulations and within the deadlines established by said entity.

The completion and presentation of Report 75 will be the responsibility of the Transparency and Compliance area and the Compliance Officer, within the framework of their functions. The report must be submitted annually through the application provided by the Superintendence of Corporations, in accordance with the schedule defined according to the last two (2) digits of the NIT.

17.5. Report 58 – Compliance Officers

The Company shall file Report 58 – Compliance Officers with the Superintendence of Companies each time there is a new development related to the appointment, change, removal or resignation of the Compliance Officer.

The completion and presentation of this report will be the responsibility of the Transparency and Compliance area and the Compliance Officer, and must be carried out within the deadlines established in the regulations in force, in accordance with the nature of the news reported.

18. WHISTLEBLOWER PROTECTION POLICY

Alpina adopts a whistleblower protection policy aimed at guaranteeing a safe, reliable and retaliation-free environment for Compliance Subjects and, in general, any person to report, in good faith, facts related to corruption, transnational bribery or any conduct contrary to business ethics, the PTEE and applicable regulations.

Persons who file complaints or reports of possible acts of corruption or transnational bribery, within Alpina or with respect to its collaborators, suppliers, partners or administrators, through the channels provided by the Company, will have the following guarantees:

- Confidentiality: The identity of the complainant or reporter will be kept confidential, as well as the information contained in the complaint and the facts investigated, which will be confidential.

  Confidentiality shall be subject to the exceptions provided for by law or to cases in which, due to the nature of the matter, it is necessary to transfer the information to competent authorities or to internal areas empowered to carry out investigations or adopt decisions.

  Any person who, by reason of their functions, becomes aware of a complaint or investigation must guarantee the adequate protection, conservation, administration and use of the information, which may only be shared for the purposes expressly permitted within the legal framework and the internal procedures of the Company.

- Anonymity: Alpina will allow the submission of complaints anonymously, when the whistleblower so decides, through the Ethics Line.

- Protection against retaliation: Under no circumstances may Alpina, or its directors, partners, collaborators or counterparties, take retaliation, exercise acts of persecution, workplace harassment, unjustified disciplinary measures or any other action that affects anyone who, in good faith, reports or denounces possible breaches of the PTEE or the Company's internal policies.

  Any act of retaliation may be reported through the channels provided by Alpina and will be investigated in accordance with internal procedures. The adoption of retaliation will constitute a serious offense and will lead to the imposition of the corresponding disciplinary measures, which may include the termination of the employment contract or the contractual relationship, without prejudice to the legal actions that may be appropriate.

- Scope and Limits of Protection: This policy does not exempt or protect whistleblowers from the consequences of their own misconduct. The filing of a complaint does not prevent investigations or disciplinary action for acts other than or unrelated to the complaint filed. Similarly, when a person reports his or her own misconduct, he or she may be subject to the corresponding disciplinary actions in accordance with the applicable domestic and legal regulations.

- Temporary measures: During the development of an investigation, and when necessary to protect the integrity of the process, the people involved or the Company, Alpina may adopt temporary measures, such as the preventive suspension of the employment contract or contractual relationship, the limitation or revocation of access to facilities or information systems, or other similar measures, in accordance with the Internal Investigation Protocol.

The Compliance Officer, or whoever takes his place, will be responsible for adopting the necessary measures for the effective protection of the complainant, verifying that there are no retaliations or harassing behaviors derived from the report, and ensuring the proper treatment of the information, in accordance with the internal investigation procedures and applicable regulations.

19. PENALTIES FOR NON-COMPLIANCE WITH THE PTEE

19.1. Sanctions on counterparties

In the event of non-compliance with the guidelines set forth in this Manual by any counterparty; the Company will apply the disciplinary and sanctioning procedures established in the contracts, and the regulations applicable to the type of offense. This may involve the dismissal or dismissal of the worker or any counterpart of the company, and even the criminal complaint before the corresponding authorities.

If the breach occurs on the part of a contractor, the sanctioning clauses established in the contract will be applied, and the contractual relationship may be terminated unilaterally, without the right to compensation. The same shall apply to the violation of the employment contract and/or the Internal Regulations.

20. PTEE UPDATE

This Manual must be reviewed and updated at least every two years or before when new legal or internal provisions are issued that require it. Updates resulting from such review must be submitted to the highest body for approval before implementation

Any change will be communicated to all collaborators, as well as to the stakeholders to whom it takes place.

21. PRESERVATION OF RECORDS AND/OR EVIDENCE

The support documentation of the program is located in a SharePoint provided by the Company, where you can find documentation and information related to: manuals, matrices, procedures, counterparty linkage, training, disclosures and intensified due diligence.

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

Annexes-

Annex 1 PTEE DEFINITIONS	Definitions of the PTEE
Annex II	Transnational Bribery and Corruption Risk Identification Matrix
Annex III	Alpine segmentation procedure
Annex IV	Alpine Segmentation Matrix
Annex V	Alpina Group Code of Conduct

Validity & Change Control

Note: The person responsible for the system must ensure that the information contained in this document is permanently updated.

Change Control								
Version	**Detail**	**Prepared**		**Reviewed**		**Approved**		**Validity**	
		Name	**Position**	**Name**	**Position**	**Name**	**Position**		
1	Implementation	Crowe Horwath		Gilberth Sanabria		N/A		16/12/2022	28/09/2023
2	Update	Gilberth Sanabria		Gilberth Sanabria		Highest Corporate Body		28/09/2023	26/06/2024
3	Update	Gilberth Sanabria		Ana María Silva		Highest Corporate Body		26/06/2024	24/02/2026
4	Update	Juanita Salazar		Gilberth Sanabria		Highest Corporate Body		24/02/2026	To date