

Gabrica's Anti-corruption and Anti-bribery Policy

Objective

The Board of Directors, along with GABRICA SAS' High Management, hereinafter, The Company, is committed to comply with the highest quality standards, and fulfill all laws and regulations that rule its operations.

The purpose of this Anti-Corruption and Anti-Bribery Policy is to educate The Company' staff -or those working in its representation-, regarding applicable Anti-Corruption and Anti-Bribery law, as well as disclosing its statement as a Company, guidelines, and fines defined for the breaching of its compliance policies.

Scope

This policy is a comprehensive part of the Transparency and Business Ethics Program developed by The Company, which applies to Directors, Staff employed through work contract, and other related third parties, including proxies, and representatives, etc.

Definitions

End Beneficiary: In accordance to Article 631 - 5 Law 2155 from September, 2021, it refers to a natural person(s) which, in the end, has or controls, either directly or indirectly, a client and/or a natural person in whose behalf a transaction is made. It also includes such natural person(s) performing effective and/or final control, either directly or indirectly, upon a legal person or another sort of structure without legal identity.

Client: The natural or legal persons the Company keeps a legal or contractual bond with, for the supply of the portfolio's products and/or services.

Company: Gabrica SAS

Counterparty: Any natural or legal person The Company may have any sort of commercial, business, contractual, or legal bond with. Among others, the partners, employees, clients, contractors, and products and services providers of The Company are regarded as counterparties.

Contractor: It regards any such third-party providing services to The Company or having with it a legal contractual relationship of any nature. Contractors may include, among others, providers, middlemen, agents, distributors, advisors, consultants, and individuals that are part of collaboration or shared risk contracts with The Company.

Conflict of Interest: A conflict of interest is when:

- There are conflicting interests between a staff member and the Company, which may lead the first one to adopt decisions or execute actions intended for his/her own behalf, or those of third parties, and at the expense of the Company's interests.
- When there is any circumstance that may undermine performance independence, equality, or objectivity to any of the Company's employees, which may be at the expense of the Company's interests.

Corruption: Every act, intend, omission and/or abuse of capacities derivative from a relationship of authority or trust, to obtain improper advantage, either in the public or the private sectors.

C/ST: Corruption and Transnational Bribery (by its acronym in Spanish*).

Due Diligence: The process by which The Company adopts measures for counterparties' knowledge, about its business, operations, products, and transaction volumes.

Enhanced Due Diligence (DDA*-by its acronym in Spanish*): Is the process by which the Company adopts additional and more intensive measures for counterparties' knowledge, about its business, operations, products, and transaction volumes.

Grant: It regards a person or institution that freely transfers goods or services from its patrimony to another party that accepts them.

Ethics Line: A communication channel established for employees, partners, contractors, clients, providers, and further audiences, to report in a confidential and anonymous manner, any such demeanor of corruption, irregularities, or any anti-ethical act that may oppose the good conduct and policy compliance with the Company' transparency program.

Compliance Officer: The natural person appointed by the Board to fulfill tasks and obligations established on Circular Note No. 100-000011 from August 9, 2021, in regards to the Implementation and performance of the Company's Transparency and Business Ethics Program.

Facilitation Payments: A form of bribery intended to expedite or enable the action of a public official into a routine governmental task. These Facilitation Payments tend to be demanded by Employees with weak ethical principles, to offer an exceptional level of service, and in that sense, it may be regarded as an act of Corruption.

PEP: Politically Exposed Person.



Politically Exposed Person: Politically Exposed Persona (PEP) are public officials from any sort of employment nomenclature and ranking system within domestic and territorial public administration, when appointed or delegated tasks of: standards or regulations issuance, general direction, formulation of institutional policies, and adoption of plans, programs, and projects, direct management of the Government's estate, funds, or securities, justice administration or administrative-punitive capacities, and individuals in charge of direction or management of funds within political movements or parties.

Said tasks may be performed through cost planning, public contracting, investment project management, payments, settlements, assets and property management. Decree 830 from 2021 defines the roles regarded as PEP.

Politically Exposed Persons (PEP) are also regarded as those performing preeminent tasks in another country, which are also known as Foreign Politically Exposed Persons and/or Foreign Public Officials.

Providers: Counterparties providing services and/or resources into the development of The Company' legal purpose.

PTEE*: Transparency and Business Ethics Program (By its acronym in Spanish*).

Transparency and Business Ethics Program: The document that gathers policies and procedures intended to identify, recognize, foresee, manage, and mitigate Corruption and Transnational Bribery risks that may affect The Company.

SAGRILAF*: Risk Management and Self Control System for Anti-Money Laundering and Counter Terrorism Financing, and the financing of Proliferation of Weapons of Mass Destruction (by its acronym in Spanish*). Bribery:

Foreign Public Official: Every person with a legislative, administrative or legal role in a government, its political subdivisions or local authorities, or a foreign jurisdiction, regardless on whether the individual has been appointed or elected. A Foreign Public Official also regards every person with a public role for a government, its political subdivisions or local authorities, or in a foreign jurisdiction, either within a public body, or a Governmental corporation or an entity which decision power is subject to Government control, its political subdivisions or local authorities, or to a foreign jurisdiction. Likewise, it will be understood as having the mentioned capacity, any official or agent from an international public organization.

Transnational Bribery: Legal persons which through one or several: employees, contractors, directors, or partners, own or from any subordinate legal person give, offer, or promise to give a Foreign Public Official, either directly or indirectly: amounts of money, any pecuniary value object or any other benefit or profit, in exchange for the Foreign Public Official to carry out, ignore, or delay, any sort of action related to the performance of his/her tasks, and in regards with an international business or transaction.

Statement

Gabrica is bound to comply with the highest compliance standards and corporate ethics, and to fulfill all laws and regulations that rule its operations. The Company takes on its responsibility to build by the hand of its human team a better society and future for all.

The Company features a “Zero Tolerance” with any conduct that may be understood as bribery or that may, in any other form be regarded as corrupt.

In Gabrica it is strictly prohibited any conduct of corruption or bribery, either directly or indirectly through a third-party representing the Company. This prohibiting includes bribery to a Politically Exposed Person (PEP) and commercial bribery between private individuals.

It is strictly prohibited to The Company and its representatives to offer, pay, promise to pay, authorize payment, request, receive, or authorize to receive monies, or any item of value, either directly or indirectly, with the purpose to obtain, retain, or redirect businesses toward any person, or for any other kind of self-advantage. The term “any item of value”, includes money, gifts, entertainment, travels, services, and any other sort of considerations.

Handing over and promising gifts and benefits to third parties.

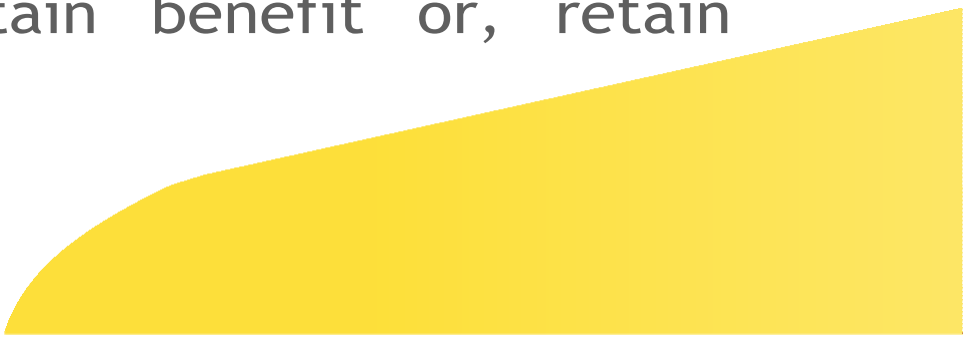
The Company's representatives and/or any of its employees, may not offer, pay, promise to pay, or authorize payment of monies or any item of value, either directly or indirectly, to any third party, with the purpose to obtain or retain businesses, or to attain any other improper advantage; therefore, prohibited gifts, considerations, and hospitalities, include but are not limited to travels, lodging, courtesies, discounts in fees, presents, dinners, entertainment, and charity contributions.

Such courtesies are only allowed, when reasonable under practice of the industry, and according to applicable legislation against corruption, and when not carried out with the purpose to retain a business or obtain any sort of improper advantage.

For the specific case of a representatives or employee that wishes to give a present or have a consideration with a PEP previous authorization for it must be provided from the General Management.

Acceptance of gifts, considerations, and hospitalities from contractors, providers, and clients

Employees may not receive gifts, considerations, or hospitalities for his/her own benefit, from contractors, providers, middlemen, consultants, or real or potential clients, should they:

1. Result into a conflict of interests, according to The Company's Manual for Conflict of Interests Management.
 2. Transgress The Company's values and/or applicable domestic or international law.
 3. Influence or seem to influence any of his/her decisions in the fulfilment of his/her tasks and/or responsibilities.
 4. Are intended for corrupt purposes.
 5. Regarding cash or its equivalent into other negotiable or exchangeable instruments.
 6. They are the means to expedite proceedings, obtain benefit or, retain businesses.
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7. They represent some kind of tip or reward for a task or proceeding performed.
8. They may negatively impact The Company's reputation.

All such situations outside guidelines described, must be given a previous approval from the General Management.

Compensations and payment of commissions to Employees.

The Company has defined a Compensation Policy that regards salary equality and competitiveness, in order to promote the organization's productivity and sustainability, attuned with the corporate strategy. This policy applies to all employees of Gabrica affiliates, regardless of the type of work contract they may have.

Costs related to entertainment, food, lodging, and travel activities.

Food, lodging, and travel expenses of employees must respond to the fulfillment of activities and tasks pertaining their roles. In that regard they will abide the guidelines established by The Company's Cost Policy.

Political contributions

A political contribution refers to any such economic assistance, even if it is not cash, in behalf of a candidate or a public office or party, and it considers special discounts or differential fees not otherwise offered to the general public.

The Company, through its representatives, may not give contributions to political campaigns, either directly or indirectly, by means of payments, payment promises, or the offering of any item of value (whether or not in cash), to candidates of a public office, political parties, or political parties officials, or any other organization or person linked to a political office election. It is not allowed to perform events or political campaigns within The Company.

Grants

Every grant must have a verifiable purpose and be carried out in compliance with a process defined by the Company and the Anti-Corruption and Anti-Bribery Policy.

All grants made must be documented by a Grant Certificate, Certificate of Delivery or Corporate Agreements. Moreover, they must be registered in the accounts pertaining such caption.

It is prohibited to perform any kind of Grant to a Domestic or Foreign public official intended to influence any action or omission with corrupt purposes to obtain an improper advantage.

Facilitation Payments

No middlemen or third parties will be used by The Company for improper payments. Facilitation Payments are prohibited. Said payments will not be made to public officials, not even if it is a common practice in a certain country.

Regardless of whether such payments may be authorized by some countries' legislation.

Filing, document upkeep and control, and accounting record procedures pertaining International Businesses or Transactions

Gabrica, in adherence to best practices and regulations, must issue and keep books, records, and accounts that provide an exact and accurate account of transactions with reasonable detail. As well as to design and maintain an internal accounting control system, sufficient to provide reasonable assurance that transactions are being suitably authorized, executed, and registered. In order to allow the Company's statutory auditor, and evaluating agencies in the system, to assess accounting accuracy, and make sure that the transfer of monies and other goods, are not hiding direct or indirect payments pertaining bribery, handouts, commissions, or any other sort of corrupt conducts.

Hence, the forging of books and records is strictly prohibited by this Policy. The Company's representatives must never make false or malicious statements on any of The Company's records, or to anybody, including external or internal auditors, about The Company's financial activity or any other type of businesses.

Documents and records pertaining the fulfillment of standards for C/TB prevention, will be kept within The Company's file for 5 years, and after that, a historical archive is to be kept for at least five (5) years in a physical and/or digital format, for a total of 10 years. Each of the Company's areas will be responsible for the custody and keeping of every record linked to their own activities, as established in this manual, and will be subject to document management provisions regarded by the Company.

Agreements or contracts with third parties

All contracts or agreements signed by the Company must contain clauses, statements, or warranties about Anti-Bribery and Anti-Corruption conducts, including the statement about knowledge of this program, its fines, and applicable Anti-Corruption law and regulation. The legal department or the department that represents it, along with Compliance Officer, must be responsible to include such clauses in all contracts, or alternatively reviewing contracts brought by third parties, that contain such set of clauses. In any case, the responsible for the negotiation must ensure that clauses are included prior the signing of contracts or agreements, should they not appear, they must be requested to said departments.

Fines for violation of the Anti-Corruption and Anti-Bribery Policy

Employees found to be breaching PTEE's provisions will be subject to internal disciplinary actions, with the further decision to terminate work contracts by fair cause, according to current work legislation of the country where staff member has been hired, in addition to criminal penalties as per applicable law for each case.

Responsibility to report acts of Corruption and/or Transnational Bribery

The Company, its managing directors, partners, and employees, promote the internal and external reporting of C/TB acts and/or irregularities that threaten the good conduct, and compliance to the Company's transparency program policies. In that sense, a confidential and anonymous Ethics Line is made available to employees and third parties, through the national toll-free Number 01-800-519-1234, and the report form is available at the Company's web site. Both mechanisms are handled by an external organization that ensure the proper management, anonymity, and confidentiality of reports received, based on the personal data treatment, and informants' protection policies established by the Company. The Company will not tolerate retaliation against any person who reports such concerns in good faith. However, it is not acceptable and will be regarded a violation to such Policy, to submit a report or provide information if knowingly false or malicious.

Update and Release

This Compliance Policy and the PTEE, will be updated at least every two (2) years and/or every time normativity changes or those regarding the Company's activity arise, which may alter its degree of C/TB risk.

The Company, with the purpose to facilitate its Contractors, employees, and Stakeholders the access, learning, training on Compliance Policies and PTEE, has recorded and released these documents within corporate communication means, and its official website. Any modification will be notified to all Employees, and all relevant stakeholders.

In addition, The Company will translate the PTEE and the Anti-Corruption and Anti-Bribery Policy to the languages of each country where International Businesses and Transactions are carried out, or where activities are performed through its Subordinate Companies, branches, and other facilities, or even Contractors in other jurisdictions, when other than spanish speaking countries.

Related Documents

- Costs Policy
 - Compensation Policy
 - Informant Protection Policy
 - Gabrica's personal data treatment and protection policy
 - Manual of Transparency and Business Ethics Program
 - Good Corporate Governance Code
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VERSION	DATE	REASON FOR UPDATING
1	24/06/2021	Creation of document
2	19/05/2022	Updating according to Circular Note No.100 - 000011 from August 9, 2021 issued by the Superintendence of Corporations

ISSUED BY	REVISED BY	APPROVED BY
Andres Felipe Hernandez G Ethics Official	Auditing Committee Minute No. May 17, 2022	Board of Directors Minute No. 212 from May 19, 2022