

**1. OBJECTIVE:**

Present the Transparency and Business Ethics Program defined by the Board of Directors related to transparency and integrity and good conduct in the Company, in order to avoid the risks of corruption and transnational bribery (C/ST).

**SPECIFIC**

- Provide an instrument that includes the values, principles and ethical standards within the organization in order to minimize the probability of occurrence or impact of risk events related to Corruption and Transnational Bribery contrary to current regulations and that must be attended by all employees and collaborators of the company.
- Frame the commitment of Navitrans and its senior managers to act ethically, transparently and correctly by virtue of their ideology of zero tolerance against acts of corruption, national and transnational bribery.
- Define parameters for the offering and receiving of gifts to third parties, expenses related to entertainment, food, lodging and travel, political contributions of any nature and donations.

**2. SCOPE:**

The Transparency and Business Ethics Program designed by Comercial Internacional de Equipos y Maquinaria S.A.S, hereinafter Navitrans, will be mandatory for all employees linked to the organization. Likewise, it includes all those employees and/or natural or legal persons, who act duly authorized on behalf of the company, and/or all natural or legal persons with whom directly or indirectly any commercial, contractual or cooperation relationship is established to establish a relationship with counterparties.

**3. RESPONSIBLE:**

Directorate-General  
Administrative and Financial Management  
Administrative and Financial Management  
Human Resources Management Area  
Risk Management Area

**4. DEFINITIONS:**

- **Whistleblowing Channel:** This is the online reporting system for complaints about acts of Transnational Bribery and corruption.

- **Compliance Officer:** This is the natural person appointed by the Directors to lead and administer the Transnational Bribery Risk Management System.
- **External Circular 100-000011 Superintendence of Companies:** Guide established for the execution of transparency and business ethics programs for the prevention of the conducts provided for in Article 2 of Law 1778 of 2016. Circular issued by the Superintendence of Corporations.
- **Contractor:** Refers, in the context of a business or transaction, to any third party that provides services to a company or has a contractual legal relationship with it of any nature. Contractors may include, but are not limited to, suppliers, intermediaries, agents, distributors, advisors, consultants, and persons who are parties to partnership, joint ventures or consortiums, or joint ventures with the company.
- **Due diligence:** It is the validation established in the internal management of the organization's critical risk where assurance is sought in contractual relations with its counterparties, in terms of prevention of risks associated with money laundering, financing of terrorism and the proliferation of weapons of mass destruction, where companies are exposed to reputational risks. legal, operational, bribery and corruption risks that may affect the Company, its subordinates and contractors.
- **Executives:** These are the Directors and the main executives of the Company, i.e., General Management, Directors, Managers and Members of the Board of Directors, whether or not they are related to the Company.
- **Risk Factor:** These are the possible elements or causes that generate C/ST Risk for any entity supervised by the Superintendence of Companies.
- **Risk management:** Processes, measures, structures and methodologies aimed at the prevention and control of the risk of bribery and corruption.
- **Anti-Corruption and Anti-Bribery Rules:** These are the FCPA Act, the UK Bribery Act, the Organisation for Economic Co-operation and Development (OECD) Convention against Transnational Bribery, the National Anti-Corruption Rules, and any other applicable anti-corruption and bribery laws.
- **National anti-corruption regulations:** This is Law 1474 of 2011 (Anti-Corruption Statute), which establishes rules aimed at strengthening the mechanisms for the prevention, investigation and punishment of acts of corruption or bribery and the effectiveness of the control of public management, as well as its regulatory decrees and the rules that modify, replace or complement it. In the same way, Law 1778 of 2016 and 2195 of 2022 is considered relevant, through which rules on the liability of legal entities for acts of transnational corruption were issued and provisions on the fight against corruption were also issued.
- **Facilitation Payments:** Payments made to government officials for the purpose of securing, promoting, or expediting legal and routine procedures for the benefit of the Company or its employees.

- **Principles:** These are the principles that aim to implement risk management systems for bribery and other acts and conduct that are considered illegal because they lack legitimacy and transparency.
- **Transparency and Business Ethics Program:** These are the procedures in charge of the Senior Management, the Administrative and Financial Management, the Human Resources and the Risk Management area, aimed at putting into operation the policies and procedures, in order to identify, detect, prevent, manage and mitigate the risks of bribery, as well as others that may be related to any act of corruption that may affect the Company or the companies. commercial relations of the latter.
- **PEP's:** Abbreviation for "Politically Exposed Persons". They are national or foreign persons who, due to their profile or the functions they perform, may expose the company to a greater degree to the risk of corruption and bribery, as well as to ML/FT/FPADM issues, such as: individuals who, by reason of their position, manage public resources or hold some degree of public power.
- **Foreign Public Servant:** It is defined in the First Paragraph of the second article of Law 1778. "Any person holding legislative, administrative, or judicial office in a State, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of whether the individual has been appointed or elected. A foreign public servant is also considered to be any person who performs a public function for a State, its political subdivisions or local authorities, or in a foreign jurisdiction, whether within a public body, or a State enterprise or an entity whose decision-making power is subject to the will of the State, its political subdivisions or local authorities. or from a foreign jurisdiction. Any official or agent of a public international organization shall also be deemed to hold the above-mentioned capacity."
- **Gift:** Any payment, gratuity, gift, courtesy or benefit, pecuniary or non-pecuniary, offered, promised, given or received directly or indirectly by an employee or collaborator without any material or immaterial compensation, is considered a gift.
- **Risk of Contagion:** It is the possibility of loss that an organization may suffer, directly or indirectly, due to an action or omission of a counterparty in relation to a crime.
- **Legal Risk:** It is the possibility of loss incurred by an entity when it is sanctioned, fined or obliged to compensate damages as a result of non-compliance with rules, regulations and/or contractual obligations. The foregoing as a result of failures in contracts, transactions derived from malicious actions, negligence or involuntary acts that affect the formalization or execution of contracts or transactions.
- **Operational Risk:** It is the possibility of incurring economic losses due to deficiencies, failures or inadequacies in human resources, implementation of techniques, infrastructure, technology or the occurrence of external events.
- **Reputational Risk:** It is the possibility that the name and corporate image of the entity will be undermined, due to negative publicity, which causes loss of customers, bad image, decrease in income and expenses in legal processes.

- **Risk of Corruption:** It is the possibility that, by action or omission, the purposes of the public administration are diverted or the public patrimony is affected towards a private good.
- **Red flags:** Relevant facts, situations, events, amounts or financial indicators from which the existence of a suspicious transaction can be inferred.
- **Corruption:** activity carried out by an employee, contractor, supplier, agent contrary to the interests of the company in which his/her position of trust is abused to achieve some personal gain or advantage for him/herself or for another person in the company in order to secure an inappropriate direct or indirect advantage for the company.
- **Bribery:** It is the act of giving, offering, promising, soliciting or receiving any gift or thing of value in exchange for a benefit or any other consideration, or in exchange for performing or omitting an act inherent to a public or private function, regardless of whether the offer, promise, or request is for oneself or for a third party. or on behalf of that person or on behalf of a third party.
- **Transnational Bribery:** It is the act by virtue of which, the Company, through its employees, senior managers, associates, contractors or subordinate companies, gives, offers or promises to a foreign public servant, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value or (iii) any benefit or utility in exchange for such public servant performing, omits or delays any act related to its functions and in connection with an international business or transaction. (In the case of this document, we'll call it bribery.)

## 5. EXECUTIVE AND EMPLOYEE ENGAGEMENT:

Navitrans is committed to conducting its activities in an ethical and transparent manner before all stakeholders, and to conduct its business in a committed and responsible manner; Therefore, our philosophy is zero tolerance for those acts that contravene the ethical principles described in this Policy and any other that governs the ethical conduct of our employees and collaborators.

Therefore, all employees, collaborators, members of executive and managerial positions, legal representatives and intermediary agents are prohibited from giving, offering, promising or authorizing, directly or indirectly through third parties, any financial or other benefit, or especially to a public official, private or any other natural or legal person. with the intent to exert undue influence, to secure undue favor, or to unduly reward conduct.

## 6. GENERAL CONDITIONS:

All Navitrans employees will be governed by the principles and values established by the organization, therefore, compliance with these will be ensured, guaranteeing the correct action inside and outside the company, which accredits us as representatives of the company.



**Corporate Values:**

**PASSION TO SERVE:** Our vocation is service and that is why our desire and interest is to serve others. We are interested in the other, we take care of listening and treating the other as we want to be treated. We are impeccable with our promises because we understand that with them we transform reality. Client: This is the person who expects something from me.

**INSPIRED FOR THE EXTRAORDINARY:** We are determined to succeed and make things happen, which is why we choose to be eagles. We value feedback as it contributes to excellence, in our quest to be better every day.

**CONSISTENT IN OUR ACTIONS:** We understand that we are 100% responsible for what we do, say and feel.

- **Integrity:** We consciously live values, doing the right thing.
- **Trust:** We build trust when we get every team member to participate.
- **Solidarity:** We are supportive when we are willing to support, learn and grow as a team.
- **Respect:** We treat others as we want to be treated.
- **Care:** We value care as a generator of well-being and sustainability.

In accordance with the foregoing, any person linked to the Company by any means is jointly responsible for the adequate and correct application of the Transparency and Business Ethics Program and must act in accordance with the principles stated in this document.

Navitrans, embracing good practices, adopts the implementation of control and reporting systems, procedures, protocols, and mechanisms, through the Friendly Line, among others, in order to ensure the prevention, identification, and treatment of acts and behaviors that are considered criminal or corrupt, that go against the principles of the organization. Navitrans prohibits any type of bribery or act of corruption, and requires compliance with all anti-corruption and anti-bribery regulations, including External Circular 100-000011 and External Circular 100-000012 of the Superintendence of Companies. Our priority is to generate a culture aimed at applying and enforcing the policies that make up the code of good governance.

The people linked to Navitrans must know and comply with all the policies and procedures that make up the code of good governance, in addition, they must fully comply with the code of ethics, which is aimed at selection, verification and negotiation with suppliers.

## 7. DESCRIPTION:

In accordance with Navitrans' principles, the Business Transparency and Ethics Program is implemented, which aims to promote and ensure the application of corporate standards and values within the organization, and, at the same time, to comply with the Code of Good Governance and the Code of Ethics, guaranteeing lawful actions and in accordance with both internal and national legal standards. In addition, it regulates the mechanisms and procedures for the prevention of acts that contravene this program and establishes due process in order to identify and establish the responsibilities of persons involved in non-transparent acts. The program has the following elements:

- **Identify and prevent** actions that may be carried out in the context of fraud, transnational bribery and corruption.
- **Promote** corporate values and compliance with the code of good governance and code of ethics, ensuring an environment of transparency and legality, in accordance with internal regulations and national laws.
- **Implement** communication on an ongoing basis to favor and encourage the reporting of such issues within the organization.
- **Strengthen** the organizational culture based on the principle of legality and transparency and on the application of the principles of ethics and responsible behavior of Navitrans employees.
- **Identify and deal with** behaviors that do not conform to the Navitrans culture and national laws, encouraging the continuous improvement of the organization's employees.
- **Guarantee** the means of reporting and accompaniment, based on rights and respect for the dignity of the person, carrying out due investigations into possible acts of corruption, fraud or bribery, guaranteeing the confidentiality of information and executing corrective and preventive measures in the face of such action. Any whistleblower is protected from retaliation.
- **Promote** the good governance of the organization's personnel and their duty to report fraudulent or suspicious actions of which they are aware.

## 8. MODALITIES THAT GO AGAINST TRANSPARENCY AND BUSINESS ETHICS:

For the purposes of the programme, bribery and corruption in general must be understood as the willingness to act dishonestly in exchange for money or personal benefits, causing harm by unfairly favouring a few who abuse their power or position. Not only does it create unfair competition, but it also limits the path to organizational efficiency and people's integrity. For ease of understanding, the following modalities are considered to be contrary to the Transparency and Business Ethics Program:

**8.1. CONFLICT OF INTEREST:** These are those situations in which the employee's judgment and the integrity of his or her evaluation may be unduly influenced by a secondary interest or benefit, generally of an economic or personal nature, that affects the application of the criteria with which the different transactions that take place within the organization must be evaluated. All employees must disclose their conflicts of interest or any situation that, due to their particularities, may be contrary to the convenience and interests of the Company. When it exists, it must be reported to Human Resources and Risk Management to evaluate the situation and take the necessary preventive and corrective measures.

It will be understood that there is a conflict of interest when the following cases occur, without these being limiting:

- When the employee has the capacity as a shareholder, director, officer, partner, agent or consultant of a supplier, customer or competitor.
- When, instead of complying with what is due, it could guide their decisions or act for their own benefit or that of a third party.
- When acting on behalf of the company in a negotiation or commercial relationship in which you may have a personal interest, direct or indirect, at the expense of the company.
- When there is influence for the purchase of inputs or services, on the occasion of personal investments in them.
- When there is a personal interest that may influence your performance at work.
- When there is some degree of consanguinity vis-à-vis suppliers, contractors and/or entities that supply any goods or services to Navitrans.

**8.2. BRIBE:** Bribery can be described as the giving or receiving by a person something of value (usually money, gifts, loans, rewards, favors, commissions, or entertainment), such as an inappropriate inducement or reward for business or any other benefit. Bribery can take place in the public sector (e.g., bribing a domestic or foreign public official or servant) or in the private sector (e.g., bribing an employee of a customer or supplier).

It is possible to be immersed in a situation of bribery, in the face of this, the employee must apply the provisions of the Code of Good Governance and the Code of Ethics of suppliers without expecting anything in return for the exercise of our responsibility, as a guarantee of a transparent and equal management of customers and suppliers" and reject the proposal in a forceful way, and to make this situation known through the provided channels such as the Friendly Line or directly inform the leader and the Compliance Officer and the risk management area.

**8.2.1. Transnational Bribery:** Navitrans will be able to partner with foreign people, in order to represent its brand in the country. It is important, then, to remember the relevance of complying with the established processes of knowledge, linkage, follow-up, control and monitoring in favor of Due Diligence in the negotiations carried out with foreign entities or persons.

Any kind of payment to a foreign official, whether direct or indirect, to influence the award of contracts, to avoid an action of control by the state or international jurisdiction, to obtain licenses or authorizations, to obtain confidential information about business opportunities or about competitive activities, to draft specifications for tender offers or to reduce government controls, is prohibited.

**8.2.2. Corruption:** It is any deliberate act, attempt or omission to obtain a benefit for oneself or for others to the detriment of organizational principles, regardless of the financial effects on companies. These are actions that are presented under one of two modalities: i) Internal: Acceptance of bribes from third parties to employees of the Company, so that their decisions, actions or omissions benefit that third party. ii) Corporate: acceptance of bribes from employees of the Company to government officials or third parties, directly or through agents; in order that the third party's decisions, actions or omissions benefit the Company, or an employee of the Company.

**8.2.3. Fraud:** It is understood as the act or omission intentional and designed to deceive others, carried out by one or more people in order to appropriate, take advantage of or take advantage of someone else's property (material or intangible) in an improper way, to the detriment of another and generally due to the lack of knowledge or malice of the affected person. Based on the above, it is especially considered that the following conducts go against transparency and corporate integrity: i) Intentional acts that seek their own benefit or that of third parties (material or immaterial) above the interests of the Company. ii) Alteration of the Company's information and documents in order to obtain a particular benefit. iii) Generation of reports based on false or inaccurate information. iv) Misuse of internal or confidential information (Intellectual Property, Inside Information, etc.). V) Deliberate conduct in contracting and bidding processes in order to obtain gifts (payments or gifts to third parties, receiving payments or gifts from third parties, etc.).

Destruction or concealment of information, records, or assets. (i) To give the appearance of legality to the resources generated from illegal activities. (ii) Earmarking resources for the financing of terrorism. - Misuse of assets owned by the Company that are in its custody. - Computer fraud. - Any irregularity similar to or related to the facts described above.



**8.2.4. Internal Pressure:** Internal pressure shall be understood as all those acts in which the processes, procedures or verifications established in the company are suggested or omitted by a direct leader, managerial position, or employee of Navitrans, to favor some type of negotiation, link or commercial transaction with customers, suppliers, contractors and/or government entities without carrying out the due processes.

### **8.3. OFFERS AND OTHER HOSPITALITY TO THIRD PARTIES**

**8.3.1. Gifts, Travel & Entertainment:** Employees must not solicit, accept, offer or provide gifts, entertainment, hospitality, travel, or sponsorships for the purpose of inducing, supporting, or rewarding misconduct, in connection with obtaining any business involving the company. Gifts, entertainment expenses or other courtesies for the benefit of an official or public servant are not permitted. **Navitrans prohibits the acceptance of gifts from employees, suppliers, customers, contractors and/or entities.** If any courtesies are considered, they should not exceed US\$50 and should be approved by the immediate leader and the Compliance Officer.

Attentions, invitations to acts, events, etc., **must in no case influence the will or objectivity** of people outside the company in order to obtain from them any inappropriate benefit or commercial advantage. Within this aspect, only normal and customary attention may be accepted within sound business practices and these must be known to the direct leader, who will define whether or not it should be returned.

**8.3.2. Negotiation with agents, intermediaries and facilitation payments:** The Company must not use intermediaries or third parties to make inappropriate payments. Facilitation payments (payments given to an official or business person to expedite a procedure) are prohibited. Such payments should not be made to public officials, even if they are common practice in a given country.

**8.3.3. Contribution to political parties, political campaigns, their representatives or candidates:** Contributions to political parties, political campaigns, their representatives or candidates may only be made when permitted by applicable laws and regulations. When the objective of the contribution is compatible with the values and ethical principles set out by Navitrans, it will be traceable through the company's accounting records.

Employees may not offer contributions to political parties, political campaigns, their representatives or candidates, in cash or in kind on behalf of the organization in exchange for obtaining advantages in transactions of a commercial nature.

**8.3.4. Donations:** Charitable donations in cash or in kind will be allowed as long as they are intended to support projects proposed by private companies, or by non-profit organizations that have a lawful purpose, that are duly authorized and constituted. For all intents and purposes, donations must be transparent, traceable, verifiable, and adequately justified. Its traceability will be left through the company's accounting records.

#### **8.4. CONTRACTS OR AGREEMENTS WITH THIRD PARTIES**

All contracts or agreements entered into by Navitrans must contain clauses, representations or warranties regarding anti-bribery and anti-corruption conduct. The Legal Department must be responsible for including these clauses in all contracts. In addition to declaring and ensuring compliance with this program, applicable anti-corruption laws and regulations, the right to terminate the contract when a violation of this program or any applicable anti-corruption laws or regulations occurs must be included. In any case, the person responsible for the negotiation must ensure that the clauses are included before the signing of the contracts or agreements, if they are not observed, they must request them from the Legal Department.

#### **8.5. ACCOUNTING RECORDS**

The Company must keep and maintain records and accounts that accurately and accurately reflect all transactions made. Navitrans employees may not change, omit or misrepresent records to conceal improper activity or activity that does not correctly indicate the nature of a recorded transaction. The company has internal controls to prevent bribes or other improper payments from being concealed or concealed in transactions such as: commissions, fee payments, sponsorships, donations, representation expenses or any other item that serves to hide or conceal the improper nature of the payment.

#### **8.6. REPORTING CHANNELS INTERNAL MECHANISMS**

##### **FRIENDLY LINE:**

**[Lineaamiga@navitrans.com.co](mailto:Lineaamiga@navitrans.com.co)**

As part of its preventive approach, the Company has a Transparency Line to which all employees, regardless of their position, and other stakeholders can communicate doubts or advisory needs in relation to compliance with the Transparency and Business Ethics Program, as well as to report conduct that is in any of the modalities of bribery or corruption. The query is received in detail, guaranteeing the confidentiality of the information and of the person presenting it, protecting them against any type of retaliation.

**Other internal reporting channels:**

Direct Leader

Human resources management

Compliance Officer

Risk Management Area

**EXTERNAL MECHANISMS:**

1. For Transnational Bribery cases:

[https://www.supersociedades.gov.co/delegatura\\_aec/Paginas/Canal-de-Denuncias-soborno-Internacional.aspx](https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-de-Denuncias-soborno-Internacional.aspx)

2. For Corruption Cases:

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

In the event of an act of transnational corruption and/or bribery, in accordance with the established warning signs and the analysis in place, the Compliance Officer will make the report to the competent authority if he or she deems it necessary. If an authority requests the provision of information, it will be provided as long as the relevant legal provisions are complied with. The Compliance Officer or the Legal Representative, as the case may be, will be in charge of delivering the information required by the requesting entities.

**9. ROLES AND ACCOUNTABILITY IN TRANSNATIONAL CORRUPTION AND BRIBERY (C/ST)**

The Legal Representative of Navitrans is in charge of promoting the Transparency and Business Ethics Program through the provision of economic, technical, and technological resources and the assignment of the Compliance Officer.

The Legal Representative, with the support of the Compliance Officer, must design policies and regulatory mechanisms around the prevention of bribery and practices that may violate due process.

All the company's workers must ensure due process and transparency of activities.

Workers who have within their activities the realization of national or international purchases or transactions must perform due diligence to know the people or companies involved in the process.

### 9.1. DIRECTORATE-GENERAL/HIGHEST BODY

The main functions of this body are based on:

- Issue and define the Compliance Policy incorporated in the program.
- Define the profile of the Compliance Officer in accordance with the Compliance Policy.
- Designate the Compliance Officer.
- Approve the document contemplated by the PTEE.
- Assume a commitment aimed at the prevention of C/ST Risks, so that the Obligated Entity can carry out its business in an ethical, transparent and honest manner.
- Ensure the provision of the economic, human and technological resources required by the Compliance Officer to carry out his/her work.
- Order the pertinent actions against the Associates, who have management and administrative functions in Navitrans, the employees, and administrators, when any of the above violates the provisions of the PTEE.
- Lead an appropriate communication and pedagogy strategy to ensure effective dissemination and knowledge of the Compliance Policies and the PTEE to Employees, Associates, Contractors and other identified stakeholders.

### 9.2. LEGAL REPRESENTATIVE

The main functions of this body are based on:

- Submit the PTEE's proposal to the Compliance Officer for approval by the highest body.
- Ensure that the PTEE is articulated with the Compliance Policies adopted by the highest corporate body.
- Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the PTEE.
- Certify to the Superintendence of Companies compliance with the provisions of current regulations (when required by this superintendence).



- 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. Documentary media must be kept in accordance with the provisions of Article 28 of Law 962 of 2005, or the regulation that modifies or replaces it.

### 9.3. COMPLIANCE OFFICER

The Compliance Officer is the natural person designated by the highest body to lead and manage C/ST risk, therefore, he or she must have special characteristics that allow him or her to carry out his or her work correctly:

The person serving as a Compliance Officer must have, at a minimum:

- a. Be an accredited Professional with a University Degree.
- b. Endowed with autonomy.
- c. Not belong to the administration, to the corporate bodies or to belong to the tax audit body or whoever performs similar functions or takes their place in the company.
- d. Have direct access to Senior Managers.
- e. Have knowledge in risk management and the ordinary course of the company's operations.
- f. Have a good reputation and professional experience.
- g. Domiciled in Colombia.

The main functions are based on:

- Submit the PTEE's proposal to the Legal Representative for approval by the highest body.
- 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 management of the Compliance Officer and the administration of the Obligated Entity, in general, in compliance with the PTEE.
- Ensure that the PTEE is articulated with the Compliance Policies adopted by the highest corporate body.
- Ensure effective, efficient and timely compliance with the PTEE.
- Implement a Risk Matrix and update it according to Navitrans' own needs, its Risk Factors, the materiality of the C/ST Risk and in accordance with the Compliance Policy;
- 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;

- Ensure the implementation of appropriate channels to allow any person to report, confidentially and securely, breaches of the PTEE and possible suspicious activities related to Corruption and Bribery;
- Verify the proper application of the whistleblower protection policy that the Obligated Entity has established and, with respect to employees, the workplace harassment prevention policy in accordance with the law;
- Establish internal investigation procedures in the Obligated Entity to detect breaches of the PTEE and acts of Corruption and Bribery;
- Coordinate the development of internal training programs;
- Verify compliance with the Due Diligence procedures applicable to the Obligated Entity;
- Ensure the proper archiving of documentary supports and other information related to the management and prevention of C/ST Risk;
- Design the methodologies for classifying, identifying, measuring and controlling C/ST Risk that will be part of the PTEE;
- Carry out the assessment of compliance with the PTEE and the C/ST Risk to which Navitrans is exposed.
- And other complementary functions.

#### **9.4. ACCOUNTING MANAGEMENT**

The main functions are based on:

- Keep the physical supports, invoices, accounting records and other documentation that may be kept in the area, related to the relationship of the third party.
- Perform analysis of transactions made when they detect a red flag.
- Report to the Compliance Officer the situations detected by him or the personnel in his charge
- Provide support to the employees in their charge for the correct adoption of the Transparency and Business Ethics Program.
- Maintain the confidentiality of the information they acquire from the verification of counterparties.
- And other complementary functions of the area.

#### **9.5. TAX AUDITOR**

The main functions are based on:

- Tax auditors will have the obligation to report to the criminal authorities, report to the Compliance Officer any act of corruption, as well as the alleged commission of a crime against the public administration, a crime against the economic and social order, or a crime against

the economic assets of the company that they have detected in the exercise of their position. They must also bring these facts to the attention of the corporate bodies and the company's administration.

- In the exercise of his/her position, the Fiscal Auditor must promote the correct execution of the resources and the denunciation of fraudulent acts that may threaten the processes, procedures and legality of Navitrans. The corresponding complaints must be filed within 6 months from the time when the Fiscal Auditor became aware of the facts.
- For the purposes of applying the Standard, the Professional Secrecy Regime that protects Tax Auditors will not be applicable.
- It will be the responsibility of the Fiscal Auditor to monitor the PTEE, reporting to the Compliance Officer and senior management the findings evidenced and suggestions for improvement.

#### **9.6. AREA MANAGERS & DIRECTORS**

The main functions are based on:

- Report to the Compliance Officer the activities detected by him or his or her personnel regarding transnational corruption and bribery activities.
- Provide support to the employees in their charge for the correct adoption of the Transparency and Business Ethics Program.
- Maintain the confidentiality of the information that he/she knows from the ordinary course of his/her position.
- And other complementary functions.

#### **9.7. GENERAL COMPANY STAFF**

The main functions are based on:

- Report the situations detected to the manager/director of the area or to the Compliance Officer.
- Attend scheduled trainings.
- Attend to the requirements and requests made by the Compliance Officer.
- Inform the area manager/director in case of a conflict of interest associated with any situation of corruption or transnational bribery.
- Refrain from informing risk sources of the causes that gave rise to the control implemented, which has been the subject of internal analysis and/or reporting to the competent authority.
- Maintain confidentiality.

## **10. C/ST RISK MANAGEMENT**

In compliance with the following stages of PTEE risk management, the company's Risk Management methodology was used.

### **10.1. Identification of C/ST Risks and Risk Factors**

The main objective of this stage is to measure the inherent risk or risk caused by each of the risk factors that have been defined in the diagnosis.

This identification includes the following stages:

- Identify critical activities related to process development based on Navitrans' existing process characterization.
- Identify the risks associated with each activity.
- Describe each risk identified.
- Identify the agents that generate the risk.
- Define its potential causes and consequences.

### **10.2. Risk Assessment**

For the evaluation of these risk events and particularly the measurement of the Inherent Risk, the probability or possibility of occurrence of the inherent C/ST risk of each of the risk events must be calculated, as well as the impact if materialized by the associated risks.

Risk Assessment allows the level of exposure of Navitrans to be established for the purpose of determining whether the identified risks are Unacceptable, Unacceptable, Tolerable or Acceptable, and to establish the Treatment Measures for them.

### **10.3. Treatment of C/ST Risk**

Once the controls have been assessed, and the new risk location area has been determined, the management options are defined, these options must be defined by the leaders of each process in the company of the Compliance Officer, determining in turn the specific preventive actions, defining in turn those responsible for their execution:

- Avoid: Take steps to prevent it from materializing. It is always the first alternative to consider.
- Reduce: Take steps to reduce both likelihood and impact.



- Sharing or transferring risk: Transferring losses to other organizations, in order to distribute risks so that they are not concentrated in a single party.
- Assume: Accept residual risk and develop contingency plans to manage it.

#### **10.4. Follow-up and Monitoring**

Continuous verification, supervision, critical observation, or determination of status, in order to identify changes with respect to the level of performance required or expected.

The Compliance Officer must monitor and control the preventive actions proposed by the leaders of the different processes. In addition, it will carry out constant monitoring of the risk matrix and thus continue with the generation of mechanisms to minimize the risks to which its processes are constantly exposed.

#### **11. FORMATS, ARCHIVING AND PRESERVATION**

The procedure for filing and preserving documents related to national or international business or transactions must comply with the document management program and the withholding tables provided by the Company. In addition, the provisions of the code of good governance document must be complied with

#### **12. SANCTIONS**

Employees shall observe all applicable rules regarding the mitigation of risks of corruption and transnational bribery, including but not limited to know-your-customer, know-your-market, document retention, reporting of C/ST acts, and industry-defined red flags; Adhering to the good practices established by the company in this regard.

Committing violations by action or omission of the policies imposed in the Transparency and Business Ethics Program may be considered SERIOUS misconduct for employees, including dismissal for just cause, in accordance with the provisions of the Substantive Labor Code, without prejudice to the criminal, administrative or civil sanctions provided for by law. when they are found to be involved in corrupt practices or violations of the provisions set forth herein.

In the event that it is evidenced that the employee incurs in violation of sanctions in Criminal Matters, Transnational Bribery is typified as a crime in the Colombian Penal Code, in article 433, in terms of imprisonment, disqualifications and monetary sanctions that involve criminal investigations, the Company will not cover expenses associated with the defense of employees or their representatives.

**13. OUTREACH & TRAINING**

The disclosure of the Transparency and Business Ethics Program must be carried out through publication by virtual means, the intranet and the Company's website, guaranteeing access and knowledge to all stakeholders. Employee training in this area must be carried out through the mandatory business training plan on an annual basis.

**14. UPDATE**

This program will be updated after analyzing the regulatory modifications made and the procedures for the mitigation, prevention and control of risk, the context of the company and the operations carried out by it. If there are no changes that warrant modifications, the minimum term of updating will be every 2 years.

The Transparency and Business Ethics Program must be available in different languages, so that its respective publication and knowledge of suppliers, partners or associates located in other countries abroad, is adequate; It will also need to be updated.

**15. COMMISSIONS**

The employment and/or brokerage contracts of the commercial and service team contain clauses in which the conditions of the payments of these are specified.

**16. RISK MANAGEMENT COORDINATOR**

CONTROL DE CAMBIO CONTENIDO			
VERSIÓN	FECHA	MODIFICACIONES	APROBO EL CAMBIO
01	14/06/2022	Creación documento	COORDINADORA GESTIÓN DE RIESGOS

RISK MANAGEMENT ANALYST  
PREPARED BY:

GENERAL MANAGEMENT  
REVIEWED BY:

31/05/2022  
DATE: