

## **TRANSPARENCY AND BUSINESS ETHICS PROGRAM (PTEE) COLREPFIN LTDA**

### **1. OBJETIVE**

This document (hereinafter “the Program” or “the PTEE”) is prepared with the purpose of complying with the instructions and adopting the recommendations issued by the SUPERINTENDENCE OF COMPANIES in its Basic Legal Circular - Chapter XIII, numeral 5, in relation with the adoption of a TRANSPARENCY AND BUSINESS ETHICS PROGRAM (PTEE) for the legal vehicle of Colrepfin Ltda. (hereinafter entity / obligated entity).

The objective of this document is to compile the policies and procedures, listing in a non-exhaustive manner the set of actions, mechanisms, and internal procedures to promote integrity, ethical values, supervision, and control; aimed at identifying, detecting, preventing, managing and mitigating the Risks of Corruption and Transnational Bribery (C/ST).

### **2. DATE OF ENTRY INTO EFFECT**

Las disposiciones incluidas en este documento tienen aplicabilidad inmediata a partir de su fecha de emisión.

### **3. LEGAL VEHICLE DESCRIPTION**

COLREPFIN It is a limited company incorporated in Colombia (country of operation) that has no subordinate companies and is part of the CITIGROUP business group in Colombia.

### **4. CONTENT OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM (PTEE)**

In accordance with section 5 of the Basic Legal Circular - Chapter This program is based on corporate policies and internal procedures, according to a risk-based approach with the characteristics of the legal vehicle.

#### **4.1 POLICIES AND PROCEDURES FOR MANAGING THE RISK OF CORRUPTION AND TRANSNATIONAL BRIBERY**

##### **4.1.1 Code of Conduct**

The PTEE is based on the Code of Conduct, which summarizes the entity's internal policies, establishing guidelines for ethical behavior that must be followed, in relation to anti-bribery and anti-corruption practices. These policies aim to prevent any type of crime and/or situations that could appear as such, avoiding acts of bribery and corruption in all the actions of the entity; The content of this is about:

- Our responsibilities and decisions.
- Way of doing business fairly and honestly.
- Way of operating as an entity.
- Treatment of ethics issues

For more detail [Code of Conduct](#) published on the entity's website.

#### **4.1.2 Anti-bribery and corruption policy**

Reputation is the key to success, therefore, all members of the entity and related third parties are subject to compliance with the Anti-Bribery and Corruption Policy; as well as compliance with related laws, some of which may have extraterritorial effect such as the United States Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act (UK Bribery). Act for its acronym in English), and local laws such as Law 1778 of February 2, 2016.

#### **4.1.3 Gifts and entertainment activities**

Corporate guidelines establish a governance framework and pre-approval and record-keeping requirements for the giving or acceptance of gifts and entertainment. Allows the entity and its employees to avoid actual or apparent conflicts of interest when providing or accepting gifts and entertainment, and to comply with applicable laws and regulations, including the FCPA and the UKBA.

Employees of the entity and any person acting on behalf of the entity are strictly prohibited from promising, offering, providing, requesting, accepting or receiving to or from outsiders.

#### **4.1.4 Donations (charitable contributions and events)**

Contributions and charitable events financed by the entity must be aligned with corporate requirements, especially those established in the Anti-Bribery and Corruption, Third Party Management and Expense Management policies.

#### **4.1.5 Expense management**

The purpose of the Policy is to provide general control of expenses and prevent fraud, ensuring that the entity's financial data and the corresponding fiscal and regulatory documents properly consider expenses assignable to the appropriate accounting period. The policy covers the acquisition and payment of goods and services and reimbursements of expenses.

## **5 Communication Channels**

The Entity believes it is essential that you feel safe when raising a concern and we invite you to openly communicate your concerns. When concerns are raised about possible conduct inappropriate or unethical behavior, the entity carries out investigations in a thorough, fair, timely and discreet manner.

The Ethics Office and its investigations are treated with the maximum possible confidentiality, consistent with the need to investigate and address the problem, and in accordance with applicable laws and regulations. Concerns can be made anonymously.

Additionally, there are the following external reporting channels that you can also use:

- Channel for reporting Transnational Bribery to the Superintendence of Companies:  
[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)
- Channel for reporting acts of Corruption to the Transparency Secretariat:  
<http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion>

Furthermore, the entity prohibits retaliation in any form against anyone who raises concerns or questions about ethics issues; refuses to participate in improper acts; report possible violations of laws, regulations, policies, standards, procedures, Code of Conduct or violation of the PTEE, among others; or participate in further investigation of those issues.

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