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# CODE OF ETHICS AND CONDUCT: INTEGRITY, TRANSPARENCY AND ANTI-CORRUPTION

Strategic Management  
BIOFIX CONSULTORIA SAS BIC

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## STATEMENT OF THE SHAREHOLDER ASSEMBLY BIOFIX BIC


At BIOFIX BIC, we understand that integrity, transparency, and ethical commitment are essential to achieving our objectives and maintaining the trust of all stakeholders aligned with our institutional mission and vision.

This Code of Ethics, Conduct, Transparency and Anti-Corruption reflects the principles and values that guide our daily activities. This Code not only establishes the expectations for the behavior of each of our employees, executives, and partners, but also reinforces our commitment to business practices that promote sustainable and fair development, seeking to achieve a harmonious balance between social and economic development and environmental conservation by working collaboratively with all our counterparts.

The Shareholders' Assembly is fully committed to complying with this Code. We understand that acting with ethics and transparency is essential to preserve the integrity of our operations and ensure the long-term success of BIOFIX BIC. All members of our company have the responsibility to adhere to the highest ethical standards, act with integrity in all decisions, and avoid any form of corruption or improper behavior.

We are committed to providing the necessary resources to ensure that this Code is understood, implemented, and respected by all. Furthermore, we ensure that reporting mechanisms are confidential and effective, protecting those who report any infringement of the Ethical framework. The Shareholders' Assembly will actively promote a culture of transparency, where ethics and respect for the law are fundamental pillars of our activities.


This document is a guide to ensure that our actions are aligned with the values that underpin our operations. We invite all members of BIOFIX BIC, as well as our partners and collaborators, to commit to this ethics, the

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transparency, and responsibility. Together, we can continue to develop projects and solutions that are not only innovative but also respect and protect the natural environment and the clients we work with.

**Ana Milena Plata Fajardo**  
**Chairman of the Shareholders' Assembly**



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## 1. INTRODUCTION

### 1.1 Mission and Vision of the Company




### 1.2 Purpose of the Code

The Code of Ethics, Conduct, Transparency and Anti-Corruption is the binding navigation charter that establishes ethical and transparency standards that must govern the actions of all employees, partners, suppliers, clients, and collaborators with whom relationships are established, defined as counterparts <sup>1</sup> of BIOFIX BIC, whose commitment to ethical compliance is established in the exercise of any role and the execution of the functions assigned in the processes.

The main purpose is to ensure that all members of BIOFIX BIC understand the ethical expectations and take responsibility for meeting them, seeking among other things:

<sup>1</sup> By counterparts, we mean all individuals who, according to the scope defined by internal guidelines, have the authority to access the provision of certain services offered by BIOFIX BIC.

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- To promote integrity and responsible behavior in the management of nature-based solutions and other actions developed in compliance with the corporate purpose. - To provide a tool to prevent, identify, and report corrupt behaviors, improper practices, or conflicts of interest. - To ensure that the company's operations are carried out transparently, fostering trust with communities, partners, and other stakeholders.

### 1.3 Scope and Application of the Code


The ethical guidelines established in this code are of mandatory compliance. Non-compliance may result in employment consequences, disciplinary actions, or legal repercussions, among others.

It is essential that the company ensures that everyday conduct reflects the assumption of responsibilities beyond interactions in the work environment, complying with applicable national and international laws, as well as with behavior standards aligned with our mission, ethical framework, vision, values, and principles established by BIOFIX BIC. This code is applicable to all counterparts of the company:

- All employees, collaborators, partners, and executives. - Suppliers and contractors. - Passive clients and participants, such as community councils, indigenous reserves, and other local communities or third parties involved in the company's mission processes.

Ethical conduct must be applied to all activities of the company, from internal management to the execution of external projects, ensuring consistency at all levels of the organization. BIOFIX BIC <sup>2</sup>, adopts this ethical regulatory framework from the Shareholders' Assembly, guaranteeing its dissemination and application.

<sup>2</sup> BIOFIX BIC Annex Document Action Plan

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## 1.4 Definition of Nature-Based Solutions (NbS)

Nature-Based Solutions (NbS) are defined as interventions that protect, sustainably manage, or restore natural and modified ecosystems, effectively and adaptively addressing social and environmental challenges. These solutions utilize natural processes to solve problems such as climate change, biodiversity loss, and soil degradation, among others, also generating positive impacts on the quality of life of local communities and the preservation of ecosystem services.

As pillars of the execution of NbS projects, it is required to ensure:

- **Protection of Ecosystems:** Ensure the conservation of biodiversity and the protection of essential ecosystem services for human well-being and environmental balance, understanding the relationship between humans and nature.
- **Climate Mitigation and Adaptation:** Contribute to the reduction of carbon emissions and help local communities and territories adapt to the impacts of climate change.
- **Sustainable Development:** Promote the sustainable use of natural resources, always considering the social, economic, and cultural needs of local communities, and seeking economically viable and socially equitable outcomes.

The SbN are aligned with the Sustainable Development Goals (SDGs), particularly in areas such as climate action, life on land, and peace, justice, and strong institutions, reinforcing the company's ethical commitment. This framework is supported by project processes and safeguard policies.

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## 2. ETHICAL VALUES

All employees, partners, and interested counterparts are expected to understand and embody these ethical values that govern our activities, reflecting them in everyday behavior. The Ethical Culture of BIOFIX BIC is committed to the following ethical values:



**We are sustainable:** We develop practices that contribute to well-being environmental and social, seeking solutions that create value and permanence for future generations, conserving ecosystems, cultures, and territories.



**We are respectful:** We value and respect ecosystems, their biodiversity, the services derived from nature, communities, their knowledge, their traditional practices, their autonomy, as well as our clients and partners.



**We are equitable:** We promote equity in the development of our projects, ensuring that all parties, including communities, partners, clients, and nature, are treated fairly.



**We are Transparent:** We maintain open, honest, and direct communication with our clients, partners, communities, and society at large that interacts with us, generating and sharing relevant information, impacts, and processes that we develop.




**We are responsible:** We know that our actions generate impacts in society and nature, which is why we make our utmost effort to contribute positively.

## 3. ETHICAL PRINCIPLES

### 3.1 Integrity and Transparency

Integrity and transparency are the foundation of the trust that society seeks to build with employees, partners, customers, suppliers, communities, and other stakeholders.

- **Integrity:** It involves always acting with honesty, consistency, and responsibility, both in decision-making and in the execution of projects. All members of

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the company must comply with legal and ethical regulations, avoiding any type of fraud, corruption, or dishonest practice.

● **Transparency:** It implies clarity in processes and communication. The company is committed to providing accessible, clear, and truthful information about its operations, decisions, and results, both to its customers and to the communities and other stakeholders involved.

This value also entails openness to accountability and public access to information regarding the environmental and social impact of projects.

### 3.2 Commitment to Sustainability and Human Development

The commitment to sustainability translates into concrete actions to protect the environment, ensure the well-being of present and future generations, and promote human development.


● **Environmental Sustainability:** The company bases its decisions on practices that minimize negative impacts on ecosystems and promote natural regeneration. All projects must be evaluated not only for their economic benefits but also for their impact on the natural environment and communities.

● **Human Development:** The importance of ecosystems for the social and economic development of communities is recognized. The company promotes the creation of opportunities that respect human and environmental rights in all our operations, ensuring that no rights violations occur and fostering equitable and sustainable development in the territories where we operate.

This principle is aligned with the SDGs, especially those related to climate action, life on land ecosystems, decent work, and economic growth.

### 3.3 Respect for Ecosystems and Biodiversity

This principle establishes a deep respect for biodiversity and the integrity of the ecosystems that sustain life on the planet.

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● **Protection of Natural Ecosystems:** The company is committed to protecting, restoring, and sustainably managing the ecosystems and biodiversity it hosts, recognizing their intrinsic value and developing stocks that do not compromise their integrity.

● **No Degradation of Resources:** Projects must not cause irreversible damage to the environment. Innovative techniques and solutions that integrate practices for restoration, preservation, and sustainable use of biodiversity will be promoted.


● **Responsible Innovation:** In the development of nature-based solutions, technologies and methods that respect natural cycles and do not jeopardize biological diversity are adopted.

### 3.4 Inclusion and Gender Equality

This principle highlights the value of inclusion and respect for all counterparts, clients, local communities, and ethnic peoples with whom we work, regardless of their gender, aiming to ensure equal access to job opportunities, training, and participation in executed projects. BIOFIX BIC is committed to strengthening and promoting the active participation and leadership of women, especially in territories, given their fundamental role in the conservation of nature.

● **Promotion of Inclusion:** The company encourages the active participation of communities in projects, not just as beneficiaries, but as key actors in the formulation and execution of nature-based solutions.

● **Recognition of Territorial Rights:** The territorial and cultural rights of local, indigenous, and Afro-descendant communities are respected, along with their ancestral connection to the territories and ecosystems. Before starting any project, it is ensured that the communities have the opportunity to participate in decision-making, fully understanding the potential impacts of the interventions. No project should proceed without the free, prior and informed consent of the affected communities.

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This value reflects the company's commitment to climate justice and respect for local cultures, ensuring that their voices and traditional knowledge are considered and valued.

### 3.5 Social and Environmental Responsibility

This principle guides the company to act responsibly, maximizing social benefits and minimizing negative environmental impact.


● **Positive Social Impact:** The company takes responsibility for generating a positive social impact in the communities where it operates, contributing to local development and improving quality of life through sustainable projects that respect community values.

● **Minimization of Environmental Impact:** All projects must consider the efficient use of natural resources, the reduction of carbon footprint, and the prevention of pollution, adopting measures to mitigate any negative impact on ecosystems and populations.

● **Safeguards Policy:** The company is committed to continuously monitoring and evaluating its social and environmental impacts, informing all stakeholders and taking corrective measures when necessary.

## 4. CONDUCTS THAT PROTECT THE ETHICS OF BIOFIX BIC


BIOFIX BIC firmly reaffirms its position in which all behaviors that violate or disregard the current ethical or legal framework are categorically rejected. Such behaviors include those acts with intent that seek to cause harm, malicious behaviors that undermine human rights, and any situation that threatens transparency, such as acts of corruption.

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The importance of each individual's contribution within the company, in the territories where we operate, and with the communities and clients we work with is emphasized. In the planning and execution of our strategy, priority is given to respect for diversity, equity, inclusion, and belonging. Through this document and the relationship policies implemented in our internal processes, we ensure that the human rights of all individuals prevail, without distinction of gender identity, sexual orientation, ethnic belonging, disability, age, level of education, or any other sociocultural characteristic of our diversity as a collective.

The ethical and behavioral commitment of those who are part of BIOFIX BIC is manifested in the following ways:

- To know, understand, and internalize this Code and to live it with integrity, coherence, and conviction, promoting its practice in daily life.
- Demonstrate knowledge and commitment to our Code by declaring conflicts of interest or ethical issues and adhering to the established guidelines through the signing of documents, certifications, or declarations defined for this purpose.
- Understand and embrace the rules and regulations governing the activities carried out, particularly those related to the prevention of money laundering, financing of terrorism, fraud, bribery, corruption, and protection of free competition, among others.
- Cooperate in the development of internal or external investigations aimed at establishing possible violations of this Code.
- Assume responsibility for decisions and actions.
- Do not retaliate against those who report in good faith alleged violations of the Code.
- Be intolerant of behaviors that violate the established principles or that fail to comply with the regulations applicable to BIOFIX BIC, ensuring that all company operations comply with current laws.
- Allow and promote the formulation of inquiries, dilemmas, and complaints.

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- Disseminate and ensure the application of internal regulations regarding compliance risks, in accordance with the controls and documents formally adopted within BIOFIX BIC.

Below, we detail the behaviors aimed at fulfilling the firm purpose of preserving personal integrity and the integrity of BIOFIX BIC:

#### 4.1 We reject corruption

Corrupt behaviors are defined, including acts such as fraud, embezzlement, bribery, extortion, abuse of power, and any other behavior that compromises the integrity of the company.


- **Active and passive corruption:** Both the offering (active) and the receiving (passive) of bribes or improper favors are defined.
- **Misuse of resources:** This includes the manipulation or diversion of company funds or assets for personal benefit or that of third parties.
- **Facilitation payments:** Payments, whether direct or indirect, for lobbying services to influence political, legislative, or government officials' decisions are prohibited, as well as the diversion of funds towards political activities, among others. All relationships and connections in BIOFIX BIC must be based on integrity and

legality, prohibiting any act that may generate the perception of a lack of transparency, omission of internal processes, or required legal documentation, which could lead to possible acts of corruption.

#### 4.2 Prohibition of Bribes, Gifts, and Inappropriate Favors

It is strictly prohibited to offer, request, accept, or receive any type of bribe, gift, favor, or inappropriate advantage that may influence business decisions.

- **Clear limits for gifts:** Gifts or favors offered or received must be within reasonable limits and should never influence business decisions.
- **Reporting of bribes:** It includes the obligation to report any attempt of bribery or inappropriate favor.

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Transnational bribery, also known as international bribery, refers to the act of offering, promising, or delivering something of value, such as money or gifts, to a foreign public official in order to obtain or retain business or improper advantages, and is expressly prohibited under Law 1778 of 2016, amended by Law 2195 of 2022 and Law 1474 of 2011.

BIOFIX BIC is committed to adhering to the FCPA (Foreign Corrupt Practices Act) of the United States, which applies even to foreign companies that do not operate in the United States if they use any financial, technological, or data transmission system from that country.

The administrators, employees, and beneficiaries of BIOFIX BIC recognize the explicit prohibition against bribing any person, particularly foreign public officials, in order to gain any unfair advantage, retain business, or influence the actions or decisions of those receiving the bribe, and we declare our commitment to comply with this federal law, applicable to BIOFIX BIC and mandatory for all individuals who are part of it.


#### 4.3. Prevention of Fraud, Corruption

The company has implemented control mechanisms to prevent fraud and corruption, including:

- **Internal controls:** Internal and external auditing systems, and established procedures to identify and mitigate fraud risks.
- **Ethics culture:** Educational programs to raise employee awareness about anti-corruption practices and a business ethical transparency program.

#### 4.4 Prevention of money laundering, financing of terrorism, and proliferation of weapons of mass destruction!

At BIOFIX BIC, we maintain a zero-tolerance policy towards any actions aimed at concealing or disguising the illicit origin of funds obtained from illegal activities such as drug trafficking, corruption, fraud, kidnapping, extortion, and human trafficking. We adopt rigorous

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due diligence procedures to prevent money laundering and the financing of terrorism, and we do not tolerate support for groups or individuals linked to terrorist activities or the proliferation of weapons of mass destruction.

#### 4.7 Full knowledge of counterparts

The importance of conducting due diligence on all counterparts before establishing any formal relationship is recognized, ensuring that they comply with current legislation and the company's internal processes.


For BIOFIX BIC, protecting its reputation and integrity is a priority. Through an analysis of information before establishing any formal relationship, as defined in precontractual and contractual processes, it is ensured that all employees and collaborators are fully aware of the internal policies related to BIOFIX BIC's regulations on money laundering, financing of terrorism, financing of the proliferation of weapons of mass destruction, and due diligence in the Manual for the Self-Control and Comprehensive Risk Management System for Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction.

#### 4.8 Ethics Line – inquiries, dilemmas, reports, protection for whistleblowers

We have an accessible and reliable Ethics Line for reporting inappropriate behaviors, where all concerns are taken seriously, and an environment of integrity is promoted. When there are questions or concerns, or if information is known about a questionable situation or misconduct involving any recipient of this Code, a report can be submitted to the Ethics Line: [lineaetica@biofix.com.co](mailto:lineaetica@biofix.com.co)

#### 4.9 Focus on Prevention

The main focus of our Code of Ethics and Conduct is on the prevention of inappropriate behaviors rather than on punishment. It is trained and communicated periodically and


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effectively in the guidelines, procedures, and best practices. All members of the organization are responsible for knowing and acting in accordance with the ethical and compliance provisions, thus protecting the integrity of the company and respect for its internal policies.

This document establishes a clear and rigorous framework to ensure ethics in all operations of BIOFIX BIC, ensuring that the highest standards of integrity, accountability, and transparency are met.

Below are some of the behaviors we promote in line with our value of Integrity, which all members of BIOFIX BIC commit to upon joining the organization:

1. **Personal ethical culture:** We promote an ethical culture that transcends the professional environment, inviting family and close ones to act under the same principles.
2. **Objective and coherent decisions:** Decisions must always be objective and aligned with the Code of Ethics and Anti-Corruption.
3. **Accuracy and reliability:** We ensure the accuracy and reliability of all reports, figures, reports, and information generated, both internally and externally.
4. **Responsible use of economic resources:** The company's economic resources are used honestly, exclusively for established purposes and in compliance with internal guidelines.
5. **Ethical use of artificial intelligence:** We apply artificial intelligence in an ethical and responsible manner, respecting intellectual property and obtaining the necessary permissions for its implementation in process optimization.
6. **Protection of confidential information:** We do not disclose confidential information of employees, contractors, family members, or anyone associated with BIOFIX BIC.
7. **Efficient inventory management:** We ensure that goods and warehouse items are used rationally and in accordance with the needs of the process.
8. **Respect for diversity:** We promote an environment of respect for all individuals, regardless of their sexual orientation and gender identity, ensuring privacy and avoiding discrimination.
9. **Responsible management of benefits:** We manage benefits efficiently, responsibly, and in accordance with the law.

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10. **Emotionally safe space:** We foster an environment free from discrimination, violence, and harassment, ensuring the emotional well-being of everyone.

11. **Compliance with working hours:** We rigorously adhere to working hours and ensure diligence in all our activities. 12. **Risk management:** We identify hazards, assess risks, and implement controls and preventive actions. 13. **Confidentiality in hiring processes:** We ensure the confidentiality of information related to hiring processes and do not disclose information classified as confidential or reserved. 14. **Due diligence in business relationships:** Before establishing business or legal relationships with third parties, we conduct thorough due diligence to understand the counterpart fully and prevent potential risks.

15. **Rigorous internal controls:** We rigorously execute internal controls to prevent risks and protect our management.


#### **Responsibility in Upholding Ethical Principles**

Each member of BIOFIX BIC is responsible for performing their role with commitment, rigor, and attention to detail, as part of the first line of defense within the Control Architecture. This involves identifying, assessing, addressing, and communicating the risks we are exposed to, thereby contributing to effective management and the promotion of a control culture that we all uphold.


#### **4.9.1 Warning Signs**

The following are various warning signs that must be reported through the Ethics Line:

- **Unusual or suspicious financial transactions:** Excessive or unjustified payments, irregular billing, payments without corresponding approvals, transfers to suspicious bank accounts, or movements not supported by proper documentation.

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- **Results of high-risk due diligence:** Identification of sanctions or restrictions related to certain countries, individuals, or entities.
- **Suspicious relationships with suppliers or contractors:** Hiring without transparent processes, close relationships with companies or individuals with corrupt backgrounds or without clear justification.
- **Deficiencies in accounting records or internal controls:** Any errors in financial information, undetected deviations, or non-compliance with internal controls.
- **Excessive gifts or presents:** Acceptance of gifts, presents, or favors outside the established guidelines, especially when they attempt to influence business decisions.
- **Lack of transparency in operations:** Absence of reasonable justification or refusal to provide relevant information about business, financial operations, or agreements.
- **History of corruption or prior legal sanctions:** Relationships with individuals or companies that have been sanctioned for corruption or appear on restrictive lists.
- **Unreported conflicts of interest:** Situations involving conflicts of interest or ethical issues that have not been reported according to the established procedure.
- **High-risk jurisdictions:** Operations or business relationships in countries recognized for their high level of corruption or as tax havens.
- **Undocumented relationships with public officials:** Interactions with public officials without the necessary justification or documentation.
- **Anticompetitive business practices:** Any act that limits free competition or affects transparency in contractual processes.
- **Unjustified cash payments:** Financial transactions conducted in cash without the corresponding justification.
- **Transactions with politically exposed persons (PEP):** Business relationships with individuals who have a high political profile that require a detailed risk analysis.
- **Lack of compliance policies in counterparts:** Counterparts without solid compliance programs that could compromise the integrity and reputation of BIOFIX BIC.

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#### 4.10 Ensure Transparency

All projects and resources of the company must be managed with complete transparency, ensuring that decisions are documented and accessible for internal or external audits.

- **Transparent Financial Record:** A clear accounting system will be implemented to allow for proper tracking of the resources and funds used.

At BIOFIX BIC, we reject a lack of clarity, transparency, or adequate disclosure of information. Our commitment to transparency extends to all our relationships with clients, suppliers, and communities, ensuring that agreements are fair and equitable.


Transparency in relationships with clients, suppliers, and communities, ensuring that agreements are fair and equitable.

#### 4.11 Preserve economic competition

BIOFIX BIC is committed to competing fairly and transparently, avoiding practices that restrict free competition or affect the functioning of the market. We ensure that all contractual processes are transparent, with equal conditions and access to information for all suppliers and contractors.

#### 4.12 Manage conflicts of interest and ethical conflicts appropriately and timely

At BIOFIX BIC, we manage conflicts of interest in such a way that transparency in decisions, actions, or management is not compromised, nor is objectivity affected, thereby preventing personal interests from prevailing over and detracting from social well-being. To this end, it will be regulated internally through the family protocol and the Corporate Governance Manual. Additionally, externally, relationship documents are guaranteed to validate that all relationships and engagements manage and report conflicts of interest.

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#### 4.13 Protected environment against workplace or sexual harassment and sexual violence.

At BIOFIX BIC, we reject any form of workplace harassment and any act of aggression or non-consensual sexual behavior that causes physical or emotional harm. These behaviors, constituting forms of inappropriate conduct, impact human rights and affect the well-being, safety, dignity, and integrity of individuals.

The company has Internal Regulations that comprehensively address these situations, where the Society provides protection, confidentiality, and tools that prevent revictimization and encompasses all measures to promote a safe environment for victims according to Law 1010 of 2006.


#### 4.14 Zero Discrimination

The processes and procedures of any kind carried out at BIOFIX BIC must be characterized by non-discrimination and the rejection of any conduct that prevents, obstructs, or restricts the full exercise of individuals' rights based on their ethnic belonging, nationality, gender identity, sexual orientation, disability, age, or any other characteristic of their diversity. BIOFIX BIC strives for the development of practices that promote equal opportunities, the elimination of barriers, the promotion of inclusion in the workplace, respect for diversity, and in our relationships with our stakeholders.<sup>3</sup>

#### 4.15 Accident and occupational disease-free operations

The provisions regarding HSE (Health, Safety, and Environment), aimed at preventing and mitigating risks to health, safety, and protection in the environment, require that

<sup>3</sup> Diversity, Equity, Inclusion and Non-Discrimination Policy

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we adopt fair labor practices and protect human rights, including the prohibition of forced and child labor.


In this regard, BIOFIX BIC is committed to the United Nations Global Compact, an initiative that promotes the commitment of the private, public, and civil society sectors to align their strategies and operations with ten universally accepted principles in the areas of human rights, labor standards, environment, and anti-corruption. At BIOFIX BIC, we promote and ensure compliance with occupational health and safety guidelines, manage risks preventively, and suspend any activity when conditions change and situations are identified that increase the likelihood of an unsafe or substandard event. Furthermore, we report incidents openly and promptly, investigating them and incorporating improvements into our HSE management system.<sup>4</sup>

#### 4.16 Care for the environment

At BIOFIX BIC, we take on the responsibility of protecting the planet and acting consciously to safeguard it, aware of the direct impact of our activities on sustainability. We are committed to recognizing and managing environmental impacts, reiterating our stance to take concrete actions in the protection and comprehensive management of natural resources.

We are committed to the responsibility of managing our decisions and activities, both professional and personal, that affect the environment, the well-being of other species, and communities. Our goal is to mitigate and prevent harm to our planet by raising awareness in our surroundings about the importance of respecting nature and exercising due diligence to prevent and mitigate the potential impacts of our operations.

<sup>4</sup> Occupational Safety and Health Policy (OSH).

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#### 4.17 Ensure the integrity of financial information

We act with honesty, ensuring integrity, accuracy, and transparency in the recording and presentation of the financial information of BIOFIX BIC. We maintain accurate and complete records of all financial transactions, complying with national and international standards and adhering to the required accounting principles and reporting standards. Under no circumstances do we manipulate or distort financial information, and we ensure that shareholders, investors, and other stakeholders receive truthful information that reflects the financial reality of the company.


To ensure the integrity of financial information, we have an accounting system that ensures the company's assets are managed appropriately and accurately reflect the transactions and dispositions of those assets. Additionally, we strictly comply with internal processes, procedures, and policies, ensuring the accuracy of financial statements before auditors and government authorities both in Colombia and abroad.

All financial information that must be reported must follow the rules of approval and disclosure of information, being correct and ensuring its completeness and accuracy. Any error must be reported immediately.

#### 4.18 Appropriate Use of Assets

The company's resources must be used efficiently and effectively, exclusively for work purposes and not personal ones. The assigned technological elements (hardware and software) are the property of the company, and all information entered into them must be used for corporate purposes.

It is essential to manage assets responsibly, preserving their value and maximizing their use to generate income and benefits without transgressing ethics and reasonable use. It is imperative to comply with the policies regarding the use of licensed software and to refrain from downloading tools that have not been approved by the corresponding area.

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Assets must be protected against loss, damage, or misuse, and they should be used to achieve goals in accordance with the guidelines of BIOFIX BIC. It is essential to recognize that assets can be tangible (for example, computers or corporate phones) or intangible (brands, information, intellectual property) and that their use must be respectful, regardless of the location or type of asset. Inappropriate use of these resources can lead to tax liabilities.

#### **4.19 Ensure contractual processes from regulatory and ethical compliance.**


At BIOFIX BIC, all stages of a contract are fulfilled (relationship, precontractual, execution, and termination), as well as activities related to approvals, modifications, extensions, or early terminations, acting in an honest, transparent manner and in compliance with applicable laws, regulations, and internal procedures.

We act with sincerity, knowing and respecting the agreed clauses, terms, and procedures, and refraining from making decisions, interacting, or managing any situation that may affect our objectivity, impartiality, or independence. We treat all parties involved in the processes equitably, respectfully, and fairly, following the principles of good faith that establish mutual trust among the parties.

Under no circumstances should acts of bribery, interference with free competition, corruption, or improper behaviors that compromise the validity or equity of the contract be allowed, encouraged, or tolerated, directly or indirectly. Integrity in contractual processes involves maintaining high ethical standards in all related procedures.

#### **4.20 Protecting whistleblowers in good faith**

At BIOFIX BIC, we value the importance of having reliable mechanisms for submitting complaints and provide protective measures for whistleblowers in good faith. This ensures that the fear of retaliation does not prevent the reporting of facts or situations that may represent a deviation from the ethical or legal framework. We are committed to ensuring the

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confidentiality and anonymity of whistleblowers, if requested, and to creating an environment of peace and trust where speaking up does not lead to adverse consequences.

#### 4.21 Respecting human rights (HR)

Respect for human rights is fundamental and is directly linked to ethical behavior. Therefore, at BIOFIX BIC, we take on the responsibility of ensuring due diligence regarding human rights, identifying risks and, when necessary, mitigating and remedying the negative impacts of our operations on the individuals who hold these rights. Our goal is to continuously improve processes, avoiding adverse effects on our stakeholders.


Acting with integrity fosters prosperity, development, and social well-being, as actions contrary to ethics affect fundamental rights to life and dignified living conditions, such as health, education, housing, and work. These deviations can have adverse consequences for society as a whole, especially for the most vulnerable individuals.

The business practices of BIOFIX BIC are aligned with respect for human rights and contribute to the creation of a more stable, equitable, and inclusive global market, fostering more prosperous and developed societies.

#### 4.22 Ensuring personal data protection

Respect for privacy is a fundamental right that protects the privacy and personal data of information holders. Personal data includes any information linked to an identifiable person, such as their name, identity number, medical information, financial information, among others.

At BIOFIX BIC, we handle personal data in accordance with applicable regulations, such as Law 1581 of 2012, Law 1266 of 2008, and others that modify or regulate them. We are committed to treating sensitive data, such as medical history, with special care.

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sexual orientation, participation in unions, or any information related to minors, among others.

The processing of personal data is carried out with empathy and respect, following the principles of restricted access, safety, confidentiality, purpose, and freedom, among others. Each area is responsible for the information under its charge and must manage it appropriately, ensuring its protection against damage, theft, or unauthorized use.

#### **4.23 Prevent any impact on the confidentiality of the information**


The information of BIOFIX BIC must be protected against internal and external threats that may compromise its integrity, confidentiality, and availability. We recognize the strategic value of our information and adopt appropriate protection mechanisms at the levels of processes, technology, and people.

It is essential to ensure the confidentiality of information and to prevent its disclosure to unauthorized individuals. Each area is responsible for managing confidential information appropriately, ensuring its classification, risk analysis, and compliance with necessary security measures. Respect for confidentiality agreements is fundamental, and the measures taken must ensure the protection of information, even after relationships with the company have ended.

#### **4.24 Use artificial intelligence (AI) ethically and responsibly**

At BIOFIX BIC, we promote the timely and responsible implementation of solutions based on Artificial Intelligence (AI). AI offers various opportunities to address the needs of the company, which is why we encourage its adoption within the process of Science, Technology and Innovation.

We recognize the advantages of technological development and the necessity of incorporating them into our processes to stay at the forefront, always using technological tools responsibly, safely, and ethically, while respecting human rights that

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may be affected. This approach is supported by international best practices and Colombia's artificial intelligence roadmap.

All administrators and employees of BIOFIX BIC, as well as their beneficiaries, are required to refrain from engaging in **Insider Trading**,<sup>5</sup> as it creates asymmetries in information and undermines public trust and market transparency.

This illegal practice occurs when a person, based on internal information not available to the public, buys or sells stocks of BIOFIX BIC. Decisions to buy or sell based on privileged information involve gaining unfair and improper advantages, which affects shareholder trust and transparency in public markets. Employees of BIOFIX BIC are aware of the prohibition on trading stocks during the restriction periods established by the company.


#### 4.25 Promoting the common welfare

At BIOFIX BIC, we think as a team, in community, in society, and therefore, the common welfare is a central aspect of our Action Plan.

#### 4.26 Being responsible with territories and society

BIOFIX BIC is committed to generating social and environmental value by contributing to territorial development and sustainability throughout its value chain. This is achieved through the conscious management of natural resources, the establishment of trust-based relationships with stakeholders in the territories, and the execution of investments that generate common welfare.

<sup>5</sup> Insider Trading: The trading of stocks based on privileged information, or insider trading, is a criminal act that involves buying or selling stocks of a company based on non-public information that could affect an investor's decision.

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Our ethical culture drives us to treat all our stakeholders with respect, empathy, justice, and dignity. Therefore, we are guided by principles of honesty, clarity, and consistency, all within the framework of our safeguard policies.<sup>6</sup>

We recognize that these groups are an integral part of our mission, and through a collaborative approach, we work on the BIOFIX BIC strategy to build trust, respond to their needs, and contribute to social well-being.

#### **4.27 We promote the gender approach and diversity**

Respect for all individuals is an essential part of the ethical culture of BIOFIX BIC, regardless of their gender identity, sexual orientation, disability, ethnicity, nationality, or any other characteristic. We promote the use of inclusive language, avoiding terms that may be exclusive, discriminatory, or violent.


We promote equal opportunities and the creation of an inclusive environment that celebrates diversity, fosters equitable participation in decision-making, and strengthens the sense of belonging within the organization.

We also recognize that certain groups may face specific risks, and we adopt measures to ensure a comprehensive approach to justice that addresses their needs and ensures that all individuals can thrive at BIOFIX BIC.<sup>7</sup>

#### **4.28 Cooperation with authorities or internal investigations**

All administrators and employees of BIOFIX BIC actively and responsibly cooperate in the development of internal or external investigations aimed at establishing possible violations of this Code, the Constitution, and the law.

<sup>6</sup> Safeguards Policy<sup>7</sup> Diversity, Equity, Inclusion and Non-Discrimination Policy

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#### 4.29 Donations Related to Vulnerable Clients and risk factors

Our organization recognizes the importance of protecting and supporting clients and/or partners in vulnerable conditions, ensuring that all activities, including donations, are carried out ethically and with profound respect for their worldview, dignity, and well-being. In this way, clear guidelines are established to guide the donations made to these clients and/or partners, which undergo a review and approval process by the General Directorate and receive endorsement from the Projects Directorate and the Administrative and Financial Directorate.


This process will ensure that each donation complies with our policies and the following guidelines:

**Identification and Protection of Vulnerable Clients and/or Partners:** Before making any donation, it will be identified whether the beneficiaries belong to groups considered vulnerable associated with Biofix BIC, in this case, indigenous communities and NARP communities<sup>8</sup>.

**Informed Consent:** In cases where a donation is made directly to a vulnerable client, it is essential to obtain their informed consent, ensuring that they fully understand the purpose, terms, and conditions of the donation. Clear and accessible information will be provided, tailored to the specific needs of the vulnerable group.

**Avoidance of Coercion or Manipulation:** Under no circumstances shall a donation be used as a tool of coercion or manipulation to influence the decisions of a vulnerable client. The organization is committed to always acting in the best interest of the client, avoiding any actions that could take advantage of their situation.

<sup>8</sup> Afro-Colombian Communities (NARP): This refers to the group of families of Afro-Colombian descent who possess their own culture, share a history, and have their own traditions and customs within the rural-urban relationship, which reveal and preserve the consciousness and identity that distinguish them from other ethnic groups.

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**Social Impact Assessment:** All donations directed to participating clients will be evaluated not only in terms of legal compliance but also for their social impact. Periodic reviews will be conducted to ensure that donations are generating a positive benefit without creating dependencies or unintended negative effects.


**Transparency and Accountability:** The organization will maintain maximum transparency in all donations related to vulnerable clients, providing detailed reports that demonstrate how resources have been used and the generated impact. These reports will be available for public review, reinforcing our commitment to ethics and social responsibility.

Likewise, the following procedure for donations is established:

Biofix BIC will ensure that all donations made are allocated to non-profit activities with legally constituted entities, and where the corresponding tax certificates are issued. It will request the following documents from potential beneficiaries in order to carry out the evaluation and allocation of donations, as well as the required due diligence processes:

- Recognition as a legal entity and being subject to official oversight.
- Unique Tax Registry – RUT.
- Photocopy of the citizenship card or the readable valid identity document of the legal representative(s) and of the person authorized to manage the resources of the respective entity.
- Compliance with the income declaration obligation and assets or income declaration as applicable, for the year immediately preceding the donation.

The society will require the donating entity to generate certificates that allow for the tax benefit resulting from the donation, including the following documents:

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- Certification of the entity, which must be signed by the legal representative and the public accountant tax auditor, stating the form, amount, and destination of the donation.
- Certificate of existence and legal representation or document serving its purpose.
- Photocopy of the professional card of the public accountant tax auditor.
- Photocopy of the identification document of the legal representative.
- The Directorate leading the relationship, execution, and supervision of the donation consolidates the aforementioned supports, which must be reviewed by the Compliance Officer.


We recognize that certain donations may pose ethical conflicts or compromise our core values. Therefore, we establish the following guidelines to prevent and manage situations that may affect the ethics of our organization:

**Rejection of Donations with Conflicts of Interest:** Donations that may create a conflict of interest or improperly influence the organization's decisions will not be accepted. This includes donations from parties seeking to obtain preferential treatment, contracts, or other undue benefits.

**Impartiality in Decision-Making:** Every donation must be received or made without compromising the impartiality of the organization. No donation will be allowed to condition, directly or indirectly, the policies, decisions, or projects of the organization, thus ensuring the independence of our actions.

**Transparency and Accountability:** To avoid any perception of misconduct, all donations must be managed with complete transparency. Periodic reports will be published detailing the use and destination of the donated funds, ensuring that they align with our ethical objectives and social responsibility.

**Prohibition of Anonymous Donations that May Compromise Ethics:** While we respect the privacy of donors, we will not accept anonymous donations if there is

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any suspicion that they may have a questionable origin or purpose. Ethics and transparency will prevail over any financial consideration.

#### 4.30 We support clear, timely, and relevant responses to control bodies

The collaborators of **Biofix BIC** are subject to audits by control bodies; therefore, we will cooperate fully with them by providing the information requested by the control entities, as well as external and internal audits. Staff will ensure that all responses provided are complete, truthful, relevant, and consistent, and we reaffirm our commitment to using public resources efficiently, reasonably, and transparently, in accordance with the objectives established by **Biofix BIC**.

### 5. Sanctions for Ethical Compliance and Anti-Corruption

Total or partial non-compliance with this Code will result in labor sanctions, which may include unilateral termination of the contract for just cause<sup>9</sup>, without prejudice to civil and criminal actions that may apply according to current regulations.


The sanctions will be determined by the Ethics and Conduct Committee, based on the severity of the violation, after conducting the due process.

It is mandatory to include contractual clauses that guarantee compliance with processes, procedures, and the ethical regulatory framework. Sanctions will not be standardized but will be determined based on the analysis of each case.

### 6. Disclosure and Communication Media

**BIOFIX BIC** will implement necessary measures to ensure the proper dissemination of this Code among its collaborators and will periodically assess their knowledge.

<sup>9</sup> Internal Regulations

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1. **Communication Channels:** In addition to the Ethics and Anti-Corruption Committee, the organization provides the following communication channels for its collaborators, suppliers, contractors, and other interested parties:


- **Ethics Line:** Email [lineaetica@biofix.com.co](mailto:lineaetica@biofix.com.co), aimed at encouraging compliance with ethical standards and preventing incidents of fraud, bad practices, or irregular situations, ensuring confidentiality and identity protection for those who make reports.
- **Social Networks:** Respecting the rights to privacy and freedom of expression of employees, it is established that any participation in social networks related to **BIOFIX BIC** must preserve the good name of the organization and will be considered solely in a personal capacity, respecting the values and principles of the Code.

2. **Communication Management:** All internal and external communications will be managed through the established official channels and must be approved by the General Directorate, especially those conducted through media.

## 7. Ethics and Conduct Committee

In order to verify matters related to compliance with this Code, the company will have an Ethics and Conduct Committee, composed of the General Directorate and the relevant management level, which will be responsible for ensuring the implementation and compliance with this Code.

The Committee may validly meet with the presence of at least three (3) of its members and will convene either in person or through non-in-person communication means, as necessary for fulfilling the assigned functions.

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As part of its responsibilities, the Ethics and Anti-Corruption Committee of the Society will be responsible for the following functions:

- To understand the matters related to the implementation and compliance of the Code of Ethics and Conduct of the Society.
- To analyze the possible violation events of this Code and determine whether violating conduct has occurred.
- Implement the necessary measures to correct the violating conduct of this Code and decide on the applicable sanctions for the Officials who have engaged in conduct in contravention of it.
- If deemed appropriate, inform the Shareholders' Assembly about the events or potential events of violation of this Code, as well as the proposed remedial actions and sanctions.
- Evaluate the adequate dissemination and awareness of the Code of Ethics and Conduct among the Officials of the Society.

When potential cases of violation of this Code involve one or more of its members, the Committee will be composed of those members who are not part of the circumstances under review.

If it is not possible to form the Committee due to lack of quorum, the General Management will designate the substitute member(s) or an Ad-hoc Committee to analyze and determine the existence of potential cases of violation of this Code.

When potential cases of violation of this Code involve the General Director, the analysis of the situation and its conclusions must be reported to the Shareholders' Assembly of the Society.

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## 8. Training and Education in Ethics and Transparency

Continuous training programs on ethics and transparency will be implemented for all collaborators of **BIOFIX BIC**, as part of the induction, re-induction, and annual training processes. The programs will include workshops and training activities on the fight against corruption and the protection of rights of indigenous communities, among other key aspects.

## 9. Supervision and Compliance Mechanisms of the Code

Monitoring mechanisms will be established to evaluate compliance with the Code of Ethics, ensuring that all its provisions are respected. This Code will be reviewed and updated regularly, adapting to regulatory and contextual changes.

## 10. Change Control

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1	Code of Ethics and Anti-Corruption		Human Management Compliance Management <b>Compliance</b>
2	Code of Ethics and Anti-Corruption Biofix Transparency	31/12/2024	Human Management Compliance Management <b>Compliance</b>