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BUSINESS ETHICS PROGRAM MANUAL

COMPLIANCE MANAGEMENT
BIOFIX CONSULTING SAS BIC

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1. INTRODUCTION

The business philosophy of BIOFIX CONSULTORÍA BIC. and its growth strategy require us to have management and corporate governance frameworks of the highest standards, as well as absolute compliance with both local and international regulatory frameworks.

For this reason, we have adopted within our business principles and practices the Business Transparency and Ethics Program, hereinafter referred to as PTEE, in order to ensure the continuity and sustainability of the business, seeking to safeguard the reputational capital of the Company and positively contributing to and impacting the communities where we operate, as well as other stakeholders.

This program, along with other Codes, manuals, and processes related to the compliance system, are guidelines from which the risk associated with the PTEE will be managed.

In this way, this document serves as a tool that allows all employees and stakeholders to act diligently in managing corruption and transnational bribery risks – C/ST.

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2. OBJECTIVE

Define the guidelines and controls for managing the PTEE of BIOFIX CONSULTORIA BIC., preventing risk situations that may arise in operations and thus mitigating the risk of corruption and transnational bribery – C/ST.

Identify, analyze, and evaluate the risks associated with Corruption and Transnational Bribery, to ensure the treatment that protects the Company from the risks generated in the development of strategic, operational, and support processes.


3. SCOPE

This Policy is directed at Employees, Executives, Shareholders, and Contractors of BIOFIX CONSULTORIA BIC. It must be applied in dealings with all Stakeholder Groups, especially in the development of commercial or contractual transactions, in order to prevent or avoid the Company being involved in activities of corruption and transnational bribery – C/ST.

The PTEE Policy establishes the general guidelines that the Company must adopt to be able to identify, assess, prevent, and mitigate the C/ST risk.

This Policy incorporates the policies, codes, manuals, and processes and procedures of the company that are part of the corporate structure where the actions and operations of the Company's Counterparts (Employees, Executives, Shareholders, Contractors, Clients) are defined and guided for the functioning of the PTEE, and it establishes consequences and sanctions for non-compliance.

The PTEE applies to all processes of BIOFIX CONSULTORÍA BIC that have a direct or indirect relationship with national and international transactions that are carried out, and it must be strictly observed and complied with by administrators, employees, associates, subsidiaries, contractors, counterparts, and other third parties with whom BIOFIX CONSULTORÍA BIC has commercial or contractual relationships. In particular, but without limitation, the PTEE must be observed and complied with by those who have direct or indirect contact with Foreign Public Officials and National officials.

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There are no exceptions to compliance with the PTEE. No economic, business, or commercial reason will be sufficient to justify a violation of the policies and principles contained in the program.

The PTEE will be updated and supplemented as the needs of the entity indicate, as well as when the activities of the company require it.

4. DEFINITIONS

For the purposes of this manual, the concepts and terms that are used with an initial capital letter will have the meaning assigned to them below, regardless of whether they are used in plural or singular form.

Senior Executives: These are natural or legal persons appointed in accordance with the company bylaws or any other internal provisions of the legal entity and Colombian law, as applicable, to manage and direct the legal entity, whether they are members of collegiate bodies or individuals considered separately. This term includes the Shareholders' Assembly and executives in high managerial positions.


Channels for receiving reports: Means enabled by **BIOFIXCONSULTORÍA BIC.** to receive reports. The following channels have been enabled: the website <https://www.biofix.co/> and the email lineaetica@biofix.com.co

Associates: This refers to those natural or legal persons who have made a monetary contribution, in labor, or in other assets valued in money to a company in exchange for shares, interest parts, stocks, or any other form of participation contemplated by Colombian laws. This includes partners and shareholders.

Ethics Committee: This refers to a committee formed and with the corresponding functions, as provided in this Manual.

Compliance Audit: It is the systematic, critical, and periodic review regarding the proper execution of the business ethics program.

Conflict of Interest: A conflict of interest is considered to be any situation in which a person faces their personal interests against those of the Company, in personal activities, or in dealings with third parties, whether they are suppliers, contractors, clients, or others, in such a way that it affects the freedom and independence of decision-making due to differences in the motives of those involved in the relationship.

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Counterparts: This term refers to any individual or legal entity with which a legal entity has a contractual or commercial relationship of any nature. This concept includes, among others, clients, suppliers, Contractors, Employees, and Associates.

Corruption: Refers to the misuse of powers derived from a relationship of authority or trust to obtain an undue advantage, both in the public and private sectors.

Due Diligence: Refers, in the context of this manual, to the periodic review that must be conducted on the legal, accounting, and financial aspects related to a business or international transaction, with the purpose of identifying and assessing the transnational bribery risks that may affect a legal entity, its subsidiaries, and its clients and suppliers.

Employee: Is the individual who agrees to provide personal services under the subordination to a legal entity or any of its subsidiaries, in exchange for compensation.

Government entity: For the purposes of this guide, this term will be understood to include all agencies that comprise the National, local, or municipal Government, as well as state-owned commercial enterprises.

or controlled by it, international organizations and agencies such as the World Bank, International Red Cross, political parties, among others.


Risk factors: Any event that increases the probability of damaging the most vulnerable points of an organization.

Fraud: Any illegal act characterized by deception, concealment, or breach of trust, which does not require the application of threats of violence or physical force. Frauds are perpetrated by individuals and organizations to obtain money, goods, and services, to avoid payments or loss of services, or to secure personal or business advantages.

Government Official

Public Official: Includes any person who works for a governmental entity or who is considered a government representative according to the current legal standards of the country of origin. Individuals who perform a public function and those who act on behalf of a political party are also considered as such. Similarly, employees and officials of companies that are state-owned or controlled by the state are included.

Stakeholders: A term of Anglo-Saxon origin that, in the business context, means

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interested or interested party. It refers to all individuals involved in the operational chain of an organization: shareholders, executives, suppliers, customers, employees, ethnic and Afro-Colombian communities, among others.

Privileged Information: This refers to specific information that is confidential or has not yet been disclosed to the public, and there is an obligation to do so in the near future.

SAGRILAF Manual: This refers to the manual designed, approved, and implemented within **BIOFIX CONSULTORIA BIC**, to prevent, manage, and control AML/CFT/FPADM risks.

Manual: This refers to the present document, which contains the Business Ethics Program.

Compliance Officer: Refers to the employee of the Company responsible for managing and supervising the operation of the Business Ethics Program and the Anti-bribery policies defined in this Manual.

Facilitation Payments: Payments made to government officials in order to secure or expedite legal and routine procedures for personal or company benefit.

Stakeholder: Person or organization that can be or are

affected by joint decisions or activities


Compliance Policies: These are the general policies adopted by Senior Executives of a legal entity so that it can conduct its business ethically, transparently, and honestly, and is capable of identifying, detecting, preventing, and mitigating risks related to transnational bribery and other corrupt practices.

Principles: Aim to implement the Transnational Bribery Risk Management Systems. Business Ethics Program: These are the specific procedures overseen by the Compliance Officer, aimed at operationalizing the Compliance Policies.

Business Ethics Program or Program: Principles, policies, and procedures to prevent the risk of Transnational Bribery, in accordance with Law 1778 of 2016 and Resolution No. 100-006261 of October 2, 2020, and External Circular No. 100-000003 of July 26, 2016, Superintendency of Companies.

Gifts: A gift includes anything of value, transferred to another person voluntarily, without any form of compensation in return.

Foreign Public Servant: Refers, in the terms of Law 1778,

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to any person holding a legislative, administrative, or judicial position in a State, its political subdivisions or local authorities, or in a foreign jurisdiction, regardless of whether the individual has been appointed or elected. A foreign public servant also includes 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 agency, a state-owned enterprise, or an entity whose decision-making power is subject to the will of the State, its political subdivisions or local authorities, or a foreign jurisdiction. It will also be understood that any official or agent of an international public organization holds the aforementioned status.

Transnational Bribery Risk

Management System: It is the system aimed at the proper articulation of the Compliance Policies with the Business Ethics Program and its appropriate implementation within the legal entity.

Bribery: It is the act of offering, promising, soliciting, or accepting anything of value in money or in kind (such as favors, gifts, products, and services), with the corrupt intent of obtaining or achieving a benefit or advantage.


inappropriately for one's own benefit or that of a third party or to influence an act or decision.

Bribery can take various forms such as: kickbacks, extortion, facilitation payments, gifts, travel payments, entertainment, sponsorships, and political contributions.

Transnational Bribery or Bribery:

Refers to the act by which a legal entity, through one or several (i) employees, (ii) Contractors, (iii) administrators, or (iv) Associates, whether its own or from any subordinate legal entity (i) offers, or (ii) promises, to a Foreign Public Servant, directly or indirectly, (i) sums of money, (ii) any object of monetary value, or (iii) another benefit or advantage, in exchange for the Foreign Public Servant to (i) perform, (ii) omit, or (iii) delay, any act related to the exercise of their functions and in relation to a business or International Transaction.

International Transaction: It refers, in the terms of Resolution No. 100-006261 of October 2, 2020, from the Superintendency of Companies, to businesses of any nature with natural or legal persons who are foreign public or private entities.

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5. REGULATIONS

international standards and norms

In the course of the significant efforts made by Colombia to combat Corruption, an international legal framework has been adopted, which includes the following conventions and agreements:


- ✓ The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. (OECD (Organization for Economic Cooperation and Development), 1997)
- ✓ The Inter-American Convention against Corruption of the Organization of American States - OAS (OAS (Organization of American States), 1996)
- ✓ The United Nations Convention against Corruption (UNCAC). (United Nations, 2004)

Some of the previous instruments explicitly promote the adoption of compliance programs and codes of conduct by companies. For example, the OECD recommendation to combat foreign bribery, adopted in 2009, urges member countries to encourage companies to develop and adopt adequate internal controls, as well as ethics and compliance programs or measures to avoid and detect bribery of foreign public officials.

National standards


a. **Article 23 of Law 1778 of 2016**, (Congress of the Republic, 2022), establishes the duty of the Superintendency of Companies to promote the adoption of transparency and business ethics programs, anti-corruption internal mechanisms, internal auditing mechanisms and standards, promotion of transparency, and mechanisms to prevent Transnational Bribery conduct in the companies under its supervision.

b. **Number 3 of article 86 of Law 222 of 1995** (Congress of the Republic, 1995) states that the Superintendency of Companies is authorized to impose sanctions or fines, whether successive or not, of up to two hundred (200) SMMLV on those who fail to comply with its orders, the law, or the statutes.

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c. **Number 28 of article 7 of Decree 1736 of 2020** (Congress of the Republic, 2020) assigns to the Superintendency of Companies the responsibility to "instruct, in the manner it determines, entities subject to its supervision on the measures they must adopt to promote transparency and business ethics in their business practices to have internal mechanisms for the prevention of acts of corruption (...)", so that there are more companies, more jobs, and competitive, productive, and enduring companies.

d. **External Circular 100-00011 of August 9, 2021, from the Superintendency of Companies**, (Superintendency of Companies, 2021).

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6. GENERAL PRINCIPLES


Our program aims to strengthen an ethical and transparent culture that, aligned with institutional values, ensures corporate sustainability, fosters trust-based relationships with stakeholders, and protects the Company against situations that may affect its reputational capital, as well as its legal and financial sustainability.

With the premise that the integrity of BIOFIX CONSULTORIA BIC is non-negotiable, it does not tolerate acts related to corruption or bribery of any kind, as well as illegal practices, and ensures that each of its collaborators adheres to the highest ethical standards and conduct in the development of the operational and commercial activities of the business.

The PTEE comprehensively compiles all internal regulations regarding the prevention and mitigation of Corruption Risks and Transnational Bribery Risks, as well as the ethical principles and values that the Company deems appropriate to conduct its business in an ethical, transparent, and honest manner. An integral part of this program is the Anti-Corruption and Transparency Code and the SAGRILAFT Manual of BIOFIX CONSULTORÍA BIC.

Therefore, the general guidelines for ensuring compliance with these principles are:

- No employee should be involved in cases of fraud, corruption, or bribery.
- No employee should receive, give, or offer gifts, tips, or favors that could improperly influence the granting of a benefit for themselves, a third party, or in favor of the Company.
- No third party may bribe on behalf of BIOFIX CONSULTORIA BIC.
- BIOFIX CONSULTORÍA BIC. does not engage in activities that appear irregular.
- The company maintains accurate books and records of the expenses incurred.
- BIOFIX CONSULTORÍA BIC complies with the local regulatory framework.


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6.1 practices or acts supporting corruption

Corruption encompasses crimes such as bribery, embezzlement, and acts like obstruction of justice, influence peddling, concealment, money laundering from corruption, and offering money to national or foreign public officials.

It is important to highlight that each of the following acts is also associated with the crime of corruption:

- The bribery of national public officials;
- Bribery of foreign public officials and officials of international public organizations;
- Bribery in the private sector;
- Embezzlement in the private sector;
- Influence peddling;
- Abuse of functions;
- Illicit enrichment;
- Money laundering;
- Concealment of the proceeds of crime; and
- Obstruction of justice.

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7. CORPORATE VALUES


All individuals associated with BIOFIX CONSULTORÍA BIC must act with honesty, respect, responsibility, commitment, and loyalty. Collaborators will maintain clear conditions in their operations, ensuring that clients can clearly understand the products and services offered by the company and the reciprocal obligations generated in every transaction.

The corporate values are defined as follows:



BIOFIX CONSULTORÍA BIC, along with its employees, forms a team that works for the country, for its people, and for its company; all its actions are governed by the following ethical guidelines:


- All administrators, directors, and collaborators who are aware of information regarding the suspicious activity of a client and/or supplier, which they believe should not have any business relationship with the company, must immediately report this situation through the Ethics Line (lineaetica@biofix.com.co).
- BIOFIX CONSULTORÍA BIC has the firm intention of optimizing its profits through the proactive management of all types of AML/CFT risks to which it may be exposed in the development of activities and businesses constitutive of its corporate purpose.
- Ensure that the control policies regarding the prevention of the risk of Corruption, Transnational Bribery, Money Laundering, and Terrorism Financing are implemented, and

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that the culture of self-control is disseminated throughout the entire Organization.

- All employees, executives, and shareholders of BIOFIX CONSULTORIA BIC are required to report any weaknesses in controls or potential failures of the PTEE compliance system to the Compliance Officer, external auditor, or Legal Representative.



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7. RESPONSIBILITIES

7.1 Corporate Governance

As a fundamental part of the commitment of the organization's executives and aligned with corporate governance practices, the Business Ethics Program must be approved by the Shareholders' Assembly and subsequently communicated to collaborators, associates, and contractors, so that they can prevent acts of bribery, corruption, and/or any other corrupt practices in their actions.


The roles and functions of each of the stakeholders involved in the corporate governance of the Business Ethics Program are described below, in addition to any other function that may have been assigned to them in any other manual or policy of the Organization:

7.2 Internal Level:

7.2.1 Shareholders' Assembly

They are required to comply with at least the obligations set forth in this Manual, which include the following, without prejudice to the fact that some of these also correspond to other bodies or collaborators of the Organization:

- a) Assume a commitment aimed at preventing Transnational Bribery, as well as any other corrupt practices, so that the organization can conduct its business ethically, transparently, and honestly.
- b) Establish the Compliance Policies and the Business Ethics Program through the instructions provided in the day-to-day operations and supervise the actions aimed at the effective prevention of Transnational Bribery and other corrupt practices.
- c) Always act with due diligence in any matter or decision related to acts of corruption or the Business Ethics Program.
- d) Promote a culture of "zero tolerance" for acts of corruption within the Organization.
- e) Demonstrate leadership and commitment regarding the Business Ethics Program.

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f) Approve this Manual and any modifications or updates that may be execute.


g) Lead the communication strategy to ensure the effective dissemination of the Compliance Policies and the Business Ethics Program, including the consequences for non-compliance, to employees, associates, contractors, communities, and the general public. h) Order the necessary technical and human resources to implement and maintain the Business Ethics Program. i) Initiate and execute the appropriate actions against the administrators, associates, and collaborators who have management and administration roles in BIOFIX CONSULTORÍA BIC., when any of the aforementioned violate the provisions of the Business Ethics Program. j) Appoint the Compliance Officer. k) Monitor and timely address the risk profile related to bribery, corruption, or other corrupt practices. l) Address each of the points in the reports presented by the Compliance Officer, documenting this in the respective minutes.

7.2.2 Ethics Committee

The Committee aims to establish the activities required for the reception, management, and response to reports received through the channels provided by **BIOFIX CONSULTORÍA BIC.** or received personally by any of the members of the Ethics Committee.

The Committee is composed of the following members: General Management, Process Leaders' Directories, Communications Area Leader, TICs Leader, Human Talent Coordinator, Compliance Officer, and Internal Control.

Internal Control will lead investigations related to economic fraud, misuse of information, unauthorized agreements, and other actions indicating non-compliance with organizational procedures and policies, as well as the abuse of power for any type of fraud. This information must be managed by the Internal Control area until evidence is gathered for subsequent review by the Ethics Committee.

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The Human Talent Coordinator will lead investigations related to reports of conflicts of interest, harassment, discrimination, leadership style, and non-compliance with the Code of Ethics and established in the internal regulations. This information must be managed by the Human Talent area until evidence is gathered for subsequent review by the Ethics Committee.

The Compliance Officer will lead investigations related to reports concerning corruption practices and bribery.

This information must be managed by the Compliance Officer until evidence is available for subsequent review by the Ethics Committee.


All members of the Committee will conduct investigations with due diligence and efficiency in order to present the results to the Committee.

The functions of the Committee are:

- a) Evaluate the cases reported through the Ethics Line.
- b) Assess the results presented by Internal Control, Human Talent, and the Compliance Officer in accordance with the topics investigated.
- c) Request additional evidence and documents to complement specific elements or aspects of the investigation.
- d) . e) Present progress reports and results to General Management.
- f) Make decisions regarding the imposition of sanctions on the

collaborators involved in the investigations.

- g) Make decisions regarding the continuity of the employment relationship with the investigated officials, complying with the procedures of Human Talent for this type of processes.
- h) In events where the decision does not involve a termination of the
The collaborator will need to implement an action plan regarding the investigated issues, establishing clear commitments and follow-up, with the decision notified to the immediate supervisor and the respective Management/Directorate.
- i) Conduct proper monitoring of the compliance with the sanctions. In the
In the event that those who are supposed to implement them do not comply, this situation must be brought to the attention of the General Manager;

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- j) In the event that the report concerns any of the members of the Ethics Committee will delegate an investigative team to carry out the necessary activities and procedures for the development of the investigation, who will be responsible for presenting the results to the Committee.

It is important to mention that if one of the members of the Ethics Committee is the subject of a complaint, they will be automatically excluded from the meetings held, and a member ad hoc will fulfill their duties; this is to avoid any conflicts of interest.


Cases of conflicts of interest that are identified and reported will be reviewed within this committee according to their complexity, examining incompatibilities and risk events that may occur in the organization.

Finally, the related cases reported in the ethical line will be analyzed in that committee.

It should be noted that this committee will be held and convened in case any updates arise, with the minutes and participation of those involved serving as support.

7.2.3 General Management – Legal Representatives

- a) Submit for approval by the Shareholders' Assembly, in coordination with the Compliance Officer, this Manual and the Business Ethics Program and its respective updates. b) Ensure that all Policies related to the Business Ethics Program of the Organization are complied with and applied. c) Adopt appropriate measures as a result of the evolution of bribery and corruption risk profiles, risk factors, and risks associated with these. d) Ensure that no person within the Organization who makes internal reports in good faith or based on a reasonable belief about facts that may be considered as acts of corruption, or acts that violate the Policies of the Organization, suffers retaliation or discrimination of any kind.

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e) Provide the physical, technological, system, and human resources that is required so that the Compliance Officer can carry out their duties and fulfill their obligations independently and autonomously.

f) Provide effective, efficient, and timely support to the Compliance Officer. g) Comment on the management reports submitted by the Officer

of Compliance.

7.2.4 Compliance Officer

a) Lead the design, structuring, and implementation of the Business Ethics Program. b) Present an annual report to the Shareholders' Assembly and General Management. c) Supervise the operation and compliance of the Business Ethics Program through a dedicated compliance audit program. d) Lead the process of articulating the Anti-Bribery Policies established in the Program, with other policies and procedures for risk management and administration by the organization. e) Inform the Ethics Committee and the company's General Management about any violations committed by any employee regarding the Business Ethics Program, so that the corresponding sanctioning procedures can be initiated as established by the internal work regulations of the Organization. f) Periodically promote adjustments, updates, and corrections to the Program. g) Coordinate the development of internal training and education programs for employees. h) Establish a system of ongoing support and guidance for employees and shareholders regarding the execution of the Business Ethics Program. i) Evaluate the reports presented by the Internal Control Coordination and the reports submitted by the external auditor, adopting appropriate measures based on the information provided.

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- j) Direct the system to receive complaints from anyone regarding a in the case of Transnational Bribery or any other corrupt practice.
- k) Order the initiation of internal investigation procedures in the Organization, when there are suspicions that a violation of Law 1778 or the Business Ethics Program has occurred.
- l) Any other that may be established throughout this Manual.

7.2.5 Internal Audit of the PTEE


a) Conduct independent semi-annual evaluations of the components of the Business Ethics Program, including the assessment of risks associated with bribery and corruption. b) Carry out systematic, critical, and periodic compliance audits on the proper execution of the Business Ethics Program. c) Formally inform General Management, the Shareholders' Assembly, the Ethics Committee, and the Compliance Officer of any weaknesses related to compliance with the Business Ethics Code and the Compliance Manual identified during the execution of the audits.

7.2.6 General Duties of All Employees of BIOFIX CONSULTORÍA BIC.

Given the ethical principles upheld by the Company, the policy governing its operations, and the philosophy it is based on, all business and activities conducted by the employees in its name or on their own behalf shall be carried out with absolute transparency and seriousness.

The primary duty of the Employee of the Organization is to maintain a strict commitment to the transparency, control, and Anti-bribery policies established by BIOFIX CONSULTORÍA BIC, which will be reflected in the fulfillment of the following duties:

- a) To know, apply, and comply with the present Business Ethics Program and the regulatory provisions on which it is based.

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b) To prioritize the observance of ethical principles and values over the achievement of the commercial goals.

c) Carry out their activities and perform their roles within the Organization in accordance with ethical principles, avoiding any conduct that contradicts them. d) Generate commitments with the Organization regarding the promotion of an ethical culture through the execution of their daily activities. e) Attend training, awareness sessions, or any training program related to the Business Ethics Program organized by BIOFIX CONSULTORÍA BIC., whether internal or external, and consistently adhere to the concepts of good business practices through ethical behaviors. f) Report through the Ethics Line if aware of behaviors that involve fraud, corruption, bribery, or any activity that contradicts good business practices.

7.3. External Level:


7.3.1 Fiscal Review

In relation to the Business Ethics Program implemented by BIOFIX CONSULTORIA BIC, the Fiscal Review must:

- a) Verify the accuracy of the accounting and ensure that in the transfers of money or other assets occurring between BIOFIX CONSULTORÍA BIC and third parties, no direct or indirect payments related to bribery or other corrupt conduct are concealed.
- b) Formally report to General Management, the Ethics Committee, and the Compliance Officer the weaknesses identified during the execution of their activities concerning corrupt practices.

7.3.2 Counterparts


All Counterparts of BIOFIX CONSULTORIA BIC, shareholders, partners, employees, clients, and suppliers of goods and services shall be obligated to comply with this Manual, including the following guidelines:

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a) Always assume a transparent attitude towards other counterparts. b) Demonstrate behavior that complies with the law in the performance of their duties. c) Reject and not promote any act of corruption or bribery in front of all counterparts with whom they interact. d) Maintain ethical and transparent behavior in the management of the Organization's human, financial, and technological resources. e) Observe the principles, values, and conduct norms established by the Organization. f) Comply with the internal regulations established for hiring and for the acquisition of goods and services. g) Not conceal any activity related to acts of corruption.

7.3.3 Specialized Audits

After the respective reports have been submitted and investigations have been advanced by the relevant control entities of BIOFIX CONSULTORÍA BIC, when the Executive Level and/or Shareholders' Assembly considers that doubts persist regarding certain actions that have been the subject of these reports and investigations, or wishes to reinforce or update the special methodologies for the prevention of bribery and corruption, it may request the Management to carry out specialized audits.

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8. POLICIES

Every person associated with BIOFIX CONSULTORÍA BIC., by any means, is jointly responsible for the proper and correct application of the Policies outlined in this document, and in particular, they have the full support of the Shareholders' Assembly to act in accordance with the principles declared in this document.


8.1 Policies Related to Community Engagement

BIOFIX SAS considers it part of its community engagement processes to promote and establish relationships that respect the rights of the communities, complying with the regulatory framework and the methodologies established in each phase of project development. This is carried out through the "POLICY FOR COMPLIANCE WITH DUE DILIGENCE REGARDING HUMAN RIGHTS IN THE APPLICATION OF SBN: Approach for monitoring, reporting, and verification mechanisms for social and environmental safeguards REDD+" and the "COMMUNICATIONS POLICY."

In summary, these policies aim for a harmonious relationship with communities based on respect for human rights with a differential ethnic approach, respect for traditional thoughts, worldviews, and beliefs, respect for the internal forms and modes of organization of the communities, as well as seeking effective communication channels that are appropriate to the territorial context. In this way, the aim is to comply with the processes associated with the fulfillment of the socio-environmental safeguards of nature-based solutions projects regarding normative political compliance, transparency, access to information, accountability, capacity building, respect for traditional knowledge, respect for territorial rights, encouragement of inclusive participation, gender approach, among others that can be detailed in the aforementioned policies.

In this regard, all collaborators of BIOFIX BIC, during the different stages considered in the Project, will seek to develop and transmit a program that evokes the following guiding principles, which in turn are materialized in the activities and indicators of Safeguards set forth in the internal policy documents:

1. Respect for due diligence in the field of human rights, with an ethnic approach as the global standard of conduct for the company where it develops projects.

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2. Respect for compliance with policies, laws, regulations, local and territorial planning instruments, and standards that fall within the jurisdiction of project development. 3. Promote communication, respect, and fulfill the commitments established in the respective spaces for the joint construction of knowledge with communities, using a participatory research and action approach. 4. Promote collaboration, that is, to work hand in hand with communities, generating inter-institutional alliances and engaging with local authorities and environmental entities, creating spaces for participation and dialogue.


8.1.1 General guidelines for engagement with communities

s

To achieve effectiveness in engagement with communities, the following must be considered:

- Identification and validation of leaders, legal representatives, and/or individuals authorized by the communities and legally established, who require the company's services.
- Establish an open dialogue and consensus in the development of each activity that will impact the project.
- Implement the established communication and conflict resolution channels for receiving PQRS and for delivering communication in the field to maintain smooth communication between the company and the communities.
- Encourage all employees and contractors who engage with the communities to adhere to the institutional values and to follow the established processes and procedures in the development of REDD+ projects and their associated policies.
- Communication and reporting mechanisms for the communities: Means used for disseminating information according to the communications policy: Website <https://www.biofix.co/>, institutional emails, contact links, phone contact, assemblies, workshops, and/or virtual or in-person meetings, written communication through authorized institutional emails, among others that may be established according to the communication media diagnosis in the field.

The specific guidelines must be considered within the processes, activities, goals, and indicators established for each of the safeguards in the framework of the policy for compliance with due diligence in the area of human rights in the application of SBN.

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8.2 Attention to PQRSD

The company has a procedure for addressing PQRSD, and each project reports from the formally authorized email addresses for the receipt and sending of information.

A record is kept of the timely receipt and attention to requests from the community submitted via the institutional email correspondencia@biofix.com.co. Similarly, there is a website <https://www.biofix.co/>, through the PQRSD link, and the email lineaetica@biofix.com.co for complaints related to violations of our Compliance Policies PTEE and SAGRILAFT, which ensure confidentiality. This refers to the current subprocess GAF-12 Reception and Correspondence responsible for the management and timely response of **PQRSD**


8.3 Ensure the protection of personal data We apply the principles that govern the processing of

personal data, for example, restricted access and circulation, security and confidentiality; those related to purpose and freedom, and others specified by law. Its application is essential to safeguard data against any form of damage, theft, loss, unauthorized access, or misuse. The specific guidelines for the protection of our data are outlined in the documents that make up the Personal Data Protection Program of BIOFIX CONSULTORÍA BIC. <https://biofix.co/politica-de-proteccion-de-datos-personales/>

8.4 Absolute Prohibition Policy on Corruption and Bribery

For the purpose of adequately preventing the risks related to acts of bribery and corruption, BIOFIX CONSULTORIA BIC adopts through this PTEE in which the organization expresses that payments to national or foreign third parties of a public or private nature (favors, exchanges, payments in cash or kind) to obtain advantages, influence a decision, or expedite procedures are not permitted, even in cases where the decision represents a legitimate interest or right of the organization.

Likewise, BIOFIX CONSULTORIA BIC and its administrators, through the adoption and dissemination of the Code of Ethics Transparency and Anti-Corruption, the SAGRILAFT Manual, and the Business Ethics Program, along with the proper management of risks associated with fraud, transnational bribery, corruption, money laundering, and terrorism financing; declare and express to all their counterparts that they do not tolerate under any circumstances, nor accept any type of

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act, operation, or business relationship that may be associated with any of these risks.

The company prohibits these improper practices in all business transactions it conducts, whether directly or through third parties, specifically including vendors, consultants, agents, representatives, contractors, suppliers, and any other intermediary and counterparty with which it has contractual or commercial relationships.

8.5 Decisive Commitment Policy of Senior Management


The Shareholders' Assembly and the management team must demonstrate a visible and active commitment to the implementation of the Company's Program. To this end, it is the policy of BIOFIX CONSULTORÍA BIC that Senior Executives and collaborators are required to decisively commit to preventing acts of fraud, bribery, and corruption.

8.6 Policies on Payments and Gifts

It is the organization's policy that no undue payments or contributions are to be made or allowed, which are prohibited in the respective national or foreign jurisdictions where the company operates or may conduct business.

This prohibition is clear and explicit, even if the undue payments are intended to benefit the organization. Below are some examples of payments that should not be made, as they violate the law and do not comply with this policy and are contrary to the values of the organization:

- A payment to improperly avoid a fine or tax.
- A payment to corruptly influence a Foreign Public Servant's decision to issue a permit or license.
- A payment to improperly secure a favorable decision for the company from a national or foreign Public Servant.
- A payment to improperly influence the awarding of a contract with a foreign State.
- A payment to a foreign legislator to support preferential legislation.
- A payment to a Foreign Public Servant to disregard the regulations or safety standards of the respective country, for the benefit of the Company or a third party.

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Improper payments, gifts, or items of value are not always obvious. They may include:

- Excessive entertainment or entertainment that is not related to a legitimate business purpose.
- Luxurious, extravagant, or excessive gifts, invitations, or presents.
- Travel that is not related to a legitimate business purpose.
- Personal loans.
- Commissions or undue payments.
- Unexplained commissions or fees.
- Donations to charity or political contributions with commitments.
- Contingent fees or fees conditioned on the 'success' of a job or management.
- Cash payments to expedite services.
- Offering employment or other benefits to the relatives of Foreign Public Officials.
- Everything defined in the Code of Ethics.

A promise or request for payment for a service that exceeds the normal, customary, or market commission or fee charged for that service is a warning sign or a "red flag" that such payment may violate the Policy.


8.6.1 Charitable donations policy and contributions to campaigns or political parties

The company recognizes the importance of protecting and supporting vulnerable customers, ensuring that all activities, including donations, are conducted ethically and with deep respect for their dignity and well-being.

Guidelines have been established in the internal processes and documents of ethical compliance and internal procedures to manage donation requests when they involve vulnerable customers, whose review and approval process will be carried out by the Shareholders' Assembly and/or General Management, with the approval of Projects and Finance, in accordance with legal parameters and internal procedures for their management.

Notwithstanding the above, at BIOFIX CONSULTORIA BIC, its employees or intermediaries must refrain from making contributions to political parties, candidates, political organizations, and individuals engaged in politics on behalf of the organization.

8.6.2 Gifts Policy, Travel, per diem or representation expenses

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Employees and directors of BIOFIX CONSULTORÍA BIC must avoid situations of conflict of interest and even situations that may appear to be a conflict when giving or receiving benefits, entertainment, or travel to or from third parties that could be interpreted as a violation of the laws or that may affect, or appear to affect, the professional regarding the pertinent work equation for the organization or a third party.

Institutional or promotional gifts or invitations that are part of the ordinary course of business, such as pens, books, and moderate-cost business entertainments, are exempt. They must define what types of gifts are allowed to give and receive, and this must align with what BIOFIX CONSULTORÍA BIC records in its code of ethics.

If the value of a gift exceeds one (1) S.M.M.L.V., the employee must report it to the Ethics Line, and the Ethics Committee will decide whether it can be accepted or if it

Representation expenses or business travel for any employee must be conducted with austerity, avoiding extravagant expenses or those outside the norm, in order to project an image consistent with our corporate values.

It is important to note that, according to the company's needs, authorizations are made to approve travel, and the per diem management procedure is followed, along with a study of travel expenses charged according to the commercial value.


8.6.3 Facilitation Payment Policy

They are not practiced, as facilitation payments are prohibited under the anti-bribery laws of most countries. Facilitation payments, also known as "expediting" or "gratuities," are small payments made to ensure or expedite the performance of a routine action to which the payer is entitled.

8.6.4 Policy on Cash Handling and Petty Cash

Regarding cash handling and petty cash, the organization must always maintain a detailed accounting record of the management, destination, and use of petty cash resources, in accordance with the definitions of the process established within the entity Policy on Third-Party Payments and Petty Cash and Third-Party Payments Policy and Procedure

8.6.5 Reporting Policy

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Every employee linked to the company is responsible for complying with the Business Ethics Program and has the support of the Shareholders' Assembly to act in accordance with the ethical principles established in the Code of Ethics, Conduct, Transparency, and Anti-corruption and in this document.

For this reason, the organization will not take any retaliation against any counterpart who in good faith reports potential acts of corruption or bribery through the established corporate reporting channels received via the Ethics Line lineaetica@biofix.com.co.

8.7 Conflict of Interest Policy

At BIOFIX CONSULTORÍA BIC., the hiring of family members and friends is allowed as long as it does not influence strategic decision-making or there is any type of benefit to one of the parties with the counterparts (suppliers, clients). In this case, the functions will be analyzed, and it will be determined whether the functions performed by the position or the counterpart could negatively influence decision-making, hiring, or any practice that could generate acts of illegal favoritism and even acts of bribery and corruption.


Conflicts of interest will be managed in such a way that transparency in decisions, actions, or management is not affected, nor will objectivity be compromised, avoiding the prevalence of personal interest over and to the detriment of social welfare. To this end, it will be regulated at an internal level with the company's internal regulations, the family protocol, and the Corporate Governance Manual. Additionally, at an external level, relationship documents will ensure that all relationships and connections manage and report conflicts of interest.

8.8 Control and Audit Policy

The Organization has a policy to maintain records and accounts that accurately and precisely reflect the transactions and dispositions of the assets of BIOFIX CONSULTORÍA BIC.

Employees, associates, and executives of the company cannot change, omit, or distort records to conceal improper activities or those that do not correctly indicate the nature of a recorded transaction.

The company has adequate procedures and internal controls to detect situations where there is an intention to conceal or cover up the improper nature of the payment.

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8.9 Relations with the public sector

BIOFIX CONSULTORÍA BIC., in its relations with the public sector, defines that any need for engagement with national authorities and personalities is conducted directly through the company's representatives or through industry associations.

The Organization will provide effective collaboration with state entities regarding investigations related to acts of corruption, bribery, and any other illegal acts in general.

All procedures that the Organization carries out before government entities must strictly adhere to legal requirements, and it is prohibited for any collaborator to offer or receive money, gifts, or any benefit for themselves or for a third party.

Similarly, BIOFIX CONSULTORIA BIC prohibits its collaborators or representatives from holding meetings and encounters involving only one collaborator or representative with public officials in the context of bidding processes or license applications. If such meetings occur, at least two officials from the organization must be present, and the meeting must be documented.

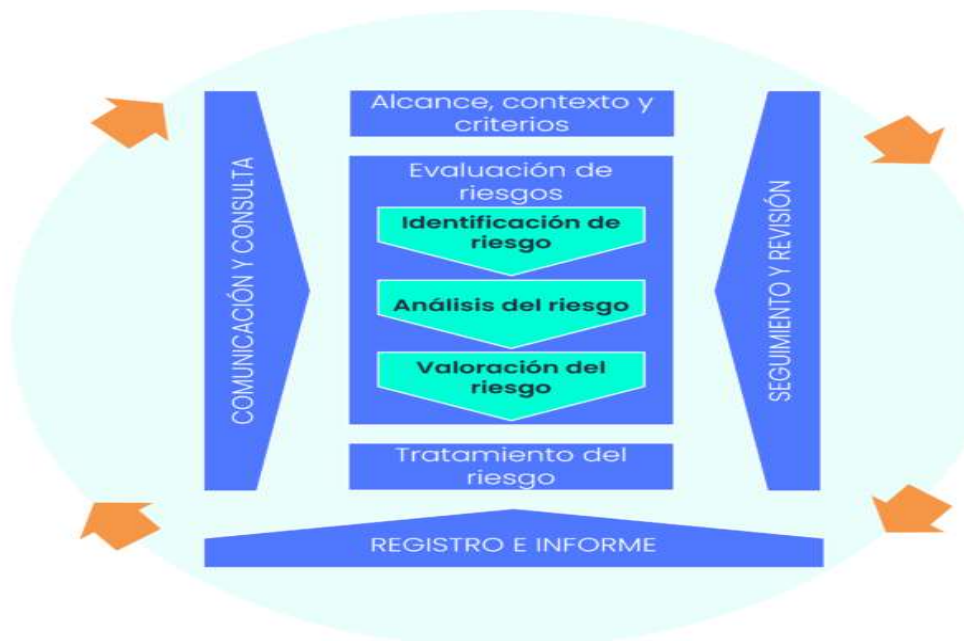
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9. RISK MANAGEMENT POLICY PTEE

It is BIOFIX CONSULTORIA BIC's policy that, for the proper implementation and launch of the Business Ethics Program, an identification and assessment of the risk factors associated with bribery and corruption to which the organization is exposed must be conducted, and they must be managed through various control mechanisms.


The PTEE implemented and designed by the company includes the stages of identification, measurement, control, and monitoring of risks. The risk management process is the systematic application of policies and procedures to transform the inherent risk of an unwanted exposure condition into a level of tolerance accepted by the organization.

The methodology on which the identification, measurement, control, and monitoring of risks is based is provided under the methodological reference ISO 31000. See definitions related to risk management.



Generalities of Risk Management

The individual and consolidated exposure to residual risk must be maintained within the levels of tolerance accepted and approved by the General Shareholders Assembly and specified in the PTEE. The level of risk exposure accepted by the General Shareholders Assembly is low.

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The sources of information for the risk identification process can be supported through work meetings held by the Compliance Officer and the area Managers or process leaders, as well as in the reports from the control entities (UIAF, Superintendencia).

The Compliance Officer will review the stages of identification and analysis of the risks of the processes at least every six months, in accordance with the prioritization of risks.

Modification or elimination of controls


No procedure of BIOFIX CONSULTORIA BIC. with incidence and controls that contribute to the risk mitigation of Corruption and Transnational Bribery CST, may be modified or eliminated without prior review by the Compliance Officer and the leader responsible for the control.

9.1. Risk Identification C/ST

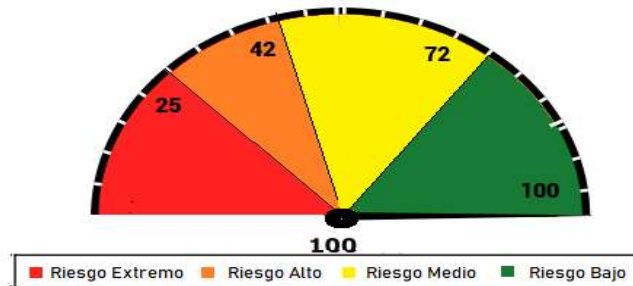
In this first phase of the methodology, the possible concrete causes of the risks of **C/ST** are systematically identified, as well as the various and potential effects that must be faced, in order to determine the source or causes and consequences of the risks.

In this stage, the following activities are carried out:

- Classification and analysis of risk factors through the information provided in the knowledge formats.
- The current or potential risks of sensitive processes are characterized as mechanisms to facilitate illicit activities, regardless of whether they are controlled or not.
- Classification and analysis of risk factors through the information provided in the knowledge formats, documentary file, and the consultation in restrictive lists.
- Report of suspicious operations detected by the company, by internal audit, or by the external auditor.
- Information from national and/or foreign media.

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o The degree of risk of **C/ST** is classified as Extreme, High, Moderate, and Low in each event depending on the risk factor




- The segmentation and classification of the C/ST risk factors are managed, determined according to the specific characteristics of each counterpart and as established in numeral 7.2 of this document.
- Design and updating of the Risk Matrix, where the internal and external context of BIOFIX CONSULTORÍA BIC. is analyzed, allowing for the appropriate identification of risks according to the structure and processes of the company based on its environment and activities.
- The Compliance Officer manages the preparation, modification, and monitoring of the risk matrix, which is carried out with the risk management information generated in the SAGRILAFT & PTEE Compliance process, along with the leaders of the company's processes where relationships, links, and transactions with counterparts are managed.
- In the event that the materialization of a risk is identified, the Compliance Officer must document the corrective, preventive, or improvement actions and their communication at the executive and management levels.

9.1.1 Segmentation of Risk Factors

Segmentation is a strategic process through which risk factors are grouped into homogeneous groups within each segment while simultaneously ensuring heterogeneity among them, based on significant differences in their characteristics. This analysis allows for the optimization of risk management related to Corruption / Transnational Bribery **C/ST**, Money Laundering (ML), Terrorism Financing (TF), and Financing of the Proliferation of Weapons of Mass Destruction (FPWMD).

The main objective of conducting segmentation is to apply differentiated monitoring and follow-up strategies for counterparts, based on the combination of risk factors

1. Focus efforts on segments with a higher risk profile.
2. Prioritize

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3. Optimize resources by adjusting strategies to the specific

Segmentation Criteria

The main criteria for conducting segmentation and profiling of risk factors are described below:

a. Segmentation by Counterparty Type and Nature • Natural

Persons: Individual clients, local or ext Rangers.

- Legal Entities: Companies of various sizes, non-profit organizations, and government entities.
- High-Risk Clients: or Final Beneficiaries: Natural persons who own or control an entity. or Politically Exposed Persons (PEPs). or Clients in high-risk areas or with unusual activities.

- Recurring Clientship: Spreads classification for the organization frequency of

b. Segmentation by Business Relationship • Participating Clients: Those with high involvement

growth in our mission and financial processes.

- Passive Clients: Counterparts with a high degree of importance in our business operations.
- Suppliers: Entities that provide goods or services.
- Third Parties: Includes contractors, subcontractors, and other related parties.
- Collaborators: Internal individuals whose relationship may pose risks.

c. Segmentation by Geography • High-Risk Areas: Regio

identified by international organizations (FATF/GAFI) as vulnerable to **C/ST**.


- Low-Risk Zones: Areas with strict regulations and a reduced history of illicit activities.

d. Segmentation by Transactional Characteristics 1. **Recurring Transactions:** Payments or activities

that are continuous. 2. **One-Time Transactions:** Isolated operations, especially of high value. 3. **International Transactions:** Movements involving multiple jurisdictions.

9.1.2 Profiling and Segmentation Model A practical model of profiling and segmentation

It can be structured in a spreadsheet (Excel) to record and analyze each criterion with specific scores that allow categorizing the risk level of the management database called Control_Compliance Board.

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9.2 Measurement or Evaluation

In the measurement stage s

It measures the possibility, probability, or frequency of occurrence of the inherent risk of **C/ST** against each of the risk factors, as well as the impact in case it materializes through the associated risks. These measurements are qualitative or quantitative in nature, described in the *Risk Matrix Controls and Indicators*.

In this stage, a qualitative assessment of the identified risks is developed without considering the treatment actions designed for the process. For this, measurement criteria for probability and Impact are established, which are selected based on the experience of the process leaders and under the guidance of the Compliance Officer. This activity is described in the *risk analysis procedure*.

The measurement criteria are detailed below.

9.2.1 Probability or Frequency:

Probability or frequency is a qualitative variable for measuring risk, representing the number of times a specific risk event could occur over the course of a year.

The criteria for evaluating the probability at Biofix Consulting are detailed below: they will be as follows:


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Table 1. Probability Measurement Criteria

| FACTOR | RANGO | PUNTUACION |
|-------------------------------|-----------------------------|------------|
| Complejidad del procedimiento | Muy facil de ejecutar | 1 |
| | Facil de ejecutar | 2 |
| | Complejo | 4 |
| | Muy complejo | 8 |
| | No aplica | 0 |
| Automatización | Automático | 1 |
| | Semiautomático | 2 |
| | Manual | 4 |
| | No aplica | 0 |
| Idoneidad del personal | Excelente | 1 |
| | Bueno | 2 |
| | Regular | 4 |
| | Deficiente | 8 |
| Materialización del riesgo | No aplica | 0 |
| | Ocurrió una vez al año | 1 |
| | Ocurrió dos veces al año | 2 |
| | Ocurrió una vez al mes | 4 |
| | Ocurrió una vez a la semana | 8 |
| Frecuencia del procedimiento | No ha ocurrido | 0 |
| | Anual | 0,5 |
| | Semestral | 1 |
| | Mensual | 2 |
| | Semanal | 4 |
| Calidad de la documentación | Diario | 8 |
| | Muy completa | 1 |
| | Completa | 2 |
| | Aceptable | 4 |
| | Deficiente | 8 |
| Comunicación | No aplica | 0 |
| | Excelente | 1 |
| | Buena | 2 |
| | Moderada | 4 |
| | Deficiente | 8 |

9.2.2 Impact:

In the risk analysis methodology, the impact reflects the effect that the presence of a risk event is estimated to have on the process in qualitative terms, that is, the potential loss. The criteria used for its measurement include the sanctions for non-compliance with obligations and sanctions related to the PE and the PTEE according to Law 1908 of 2018 (Congress of the Republic, 2018):


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Table 2 Impact Measurement Criteria

| PERDI FINANCIAL DATA - Quantification | | | |
|--|---------------|--|---|
| Value | Level | Minimum | Maximum |
| 5 | Significant | 10,000,001 | 99,999,999,999 |
| 4 | High | 7,500,001 | 10,000,000 |
| 3 | Medium | 5,000,001 | 7,500,000 |
| 2 | Low | 2,500,001 | 5,000,000 |
| 1 | Insignificant | - | 2,500,000 |
| SOFT LOSSES - Quantification | | | |
| Value | Level | Image Impact | Legal |
| 5 | Significant | News Publication in mass media national (press, television, radio) | Accusations and fines significant by regulatory bodies, very serious litigation |
| 4 | High | Image Impact on national level (a media of communication) | Requirement formal investigation by any regulatory body, litigation greater |
| 3 | Medium | Impact on the image of local level (clients' guild group) | Informal requirement by some regulatory body, minor litigations |
| 2 | Under | Impact less than the reputation before control entities Control | Informal requirement by some regulatory body, minor conciliations |
| 1 | Insignificant | Image Impact before one or several clients | Minor legal matters |

9.2.3 Risk Level:

Similarly, the risk level indicates the level of exposure to risk of the Company, through a valuation scale automatically generated from the combination of the probability and Impact obtained for each risk, which is referred to as Inherent Risk, that is, the risk without considering the controls.

Once the treatment actions employed to manage the risk are documented and qualified, the residual risk will be obtained, which results from the generation of deviations in the probability, impact, or both variables of the inherent risk, in relation to the effectiveness of the treatment actions.

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The following table shows the levels of risk considered in the Company's methodology:

Table 3 Risk Exposure Level (Severity)


| Value | Level | Min | Max |
|-------|-----------------|-----|------|
| 5 | Highly probable | 81% | 100% |
| 4 | Very probable | 61% | 80% |
| 3 | Probable | 41% | 60% |
| 2 | Unlikely | 21% | 40% |
| 1 | Remote | 0% | 20% |

9.2.4 Control:

At this stage, measures are taken to control the inherent risk to which the organization is exposed, due to risk factors and associated risks.

By identifying the treatment actions being employed, the current level of exposure is reduced to accepted risk levels, namely:

- **Low Risk Zone:** risks are mitigated and prevented from affecting the achievement of objectives, by identifying the factors that may cause a risk to materialize. **LOW SEVERITY LEVEL**
- **Acceptability Zone:** Risk can be directly accepted, but it is necessary to implement additional controls. **MEDIUM SEVERITY LEVEL.**
- **Severe Risk Zone:** More stringent control measures must be implemented to mitigate the risk, analyzing its cost/benefit. **HIGH SEVERITY LEVEL**
- **Unacceptable Risk Zone:** This combination requires controls aimed at reducing the probability of occurrence and/or minimizing the severity of its impact, or mechanisms must be implemented to avoid this risk or transfer it, define coverage or treatment policies, and establish exposure limits. **EXTREME SEVERITY LEVEL**

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CLASS OF CONTROLS:

The adopted control measures will aim to result in a decrease in the likelihood of occurrence and/or the impact of the risk of **C/ST-LA/FT/FPADM** in the event it materializes.

Among the classes of controls that can be applied according to the specific case, we have:

A. **Preventive Controls** correspond to that

that prevent the materialization of risks by analyzing the causes that may generate them.

B. **Defective Controls** Refer to activities of detection during the execution and development of the process, which can be prior to or after the operations.

It is an alarm that is triggered in response to an abnormal situation, in situ.

C. **Corrective Controls** Which allow for correcting deviations and errors in the operation or preventing them from occurring again.

These controls are part of the Internal Control System of the organization, duly supported by policies and procedures for their operation.

Among the types of controls that can be applied according to the particular case, we have:

Types of controls:


A. **Manual Controls**

Control activities developed manually by one or several people.

B. **Semi-Automatic Controls** are procedures applied

They are procedures applied from a computer in support software, designed to prevent, detect, or correct errors or deficiencies, but which require human intervention in the process.

C. **Automatic Controls**

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They are procedures applied from a computer in support software, designed to prevent, detect, or correct errors or deficiencies, without requiring human intervention in the process.

The aforementioned control actions must be assigned a rating that evaluates whether they reduce the probability, the impact, or both, and assess the effectiveness of the treatment action based on different variables, which are mentioned below:

Table 4 Evaluation Variables of Control Effectiveness

| EVALUATED FACTOR | CHARACTERISTIC OF EFFECTIVENESS | SCORES TION | WEIGHTS TION |
|--------------------------------|---|-------------|--------------|
| Class | Corrective | 1 | 20% |
| | Detective | 2 | |
| | Preventive | 3 | |
| Audit tests | Compliance with the objective of the control | 3 | 20% |
| | Non-compliance was evidenced with the objective of the control | 2 | |
| | An audit has not been conducted on the objective of the control | 1 | |
| Effectiveness of the control | High | 3 | 20% |
| | Acceptable | 2 | |
| | Low | 1 | |
| Type | Manual | 1 | 20% |
| | Semiautomatic | 2 | |
| | Automatic | 3 | |
| Responsibility | Clearly assigned | 3 | 10% |
| | Partially assigned | 2 | |
| | Not assigned | 1 | |
| Documentation of the Procedure | Documented, Updated, and Disclosed | 3 | 10% |
| | Documented | 2 | |
| | Undocumented | 1 | |

According to the rating obtained in the assessment of the treatment actions, the effectiveness of each one is determined, in accordance with the following table.


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Table 5. Effectiveness of Treatment Actions

| Name | Min > | Max< = | Frequency a | Impact o |
|-----------|----------|-----------|----------------|-------------|
| Excellent | 24 | 30 | 3 | 3 |
| Good | 19 | 24 | 2 | 2 |
| Regular | 14 | 19 | 1 | 1 |
| Deficient | 10 | 14 | 0 | 0 |

Once a treatment action is associated with a risk, the level of residual exposure will be


9.2.5 Risk Acceptance Level of C/ST LA/FT/FPADM:

Risk acceptability level: It is the risk that the General Shareholders Assembly decides to accept in the pursuit of achieving the objectives.

At BIOFIX CONSULTORÍA BIC., residual risks are accepted when their severity is at a low or moderate level, meaning they are within the acceptability zone.

Efforts will be made to keep the residual risk below the moderate level, given that in matters of risk **LA/FT/FPADM**, although the probability of a risk event occurring may be low, the impact in the event of the risk materializing could be high.

Any residual risk that exceeds the level of acceptability must be addressed, and the necessary action plans will be taken to mitigate that risk.

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9.2.6 Monitoring

At this stage, the Compliance Officer carries out monitoring of the evolution of the inherent risk profile, the C/ST AML/CFT/FPADM, and the effective detection of unusual and suspicious operations, allowing for corrective actions to be taken, preventive measures and improvements to the PTEE.


The self-assessment is based on the following mechanisms:

- Monitoring of the processes responsible for relationships and connections with counterparts in the company.
- Analysis of the benefits achieved.
- Monitor the inherent and residual risk of each risk factor and the risks associated with C/ST.
- Review that the residual risks are within the levels of acceptance established by the company.
- Review the level of learning of the organization regarding the management of its risks.
- Carry out an effective monitoring process that facilitates the rapid detection and correction of the deficiencies identified in the risks associated with C/ST.
- It is necessary to ensure that the controls are comprehensive of all risks and that they are functioning in a timely, effective, and efficient manner.

Likewise, use the following tools:

- Collection and classification of information.
- Annual work plan, audit activities for **PTEE**, analysis of the information generated in the management of counterparts, verification against restrictive lists.
- Risk matrices. Update audited controls.
- Drafting of reports. UIAF, SUPERSOCIEDADES, response to requirements, internal and external audits of **PTEE**
- Presentation of reports to the legal representative and the Shareholders' Assembly. Adoption of action plans and/or recommendations.
- Monitoring and evaluation of the functioning of the **PTEE**.
- Automated Restrictive List System
- Risk Indicators **C/ST**.
- Update of management tools, compliance dashboard, risk matrix.

| SEVERIDAD DEL RIESGO | |
|--------------------------------|---|
| NIVEL DE SEVERIDAD E | Se percibe que es posible que el riesgo se presente con una probabilidad o impacto excesivo para la organización, generando pérdidas que exponen la continuidad de la Compañía. Esta es una Zona de Riesgo Inaceptable que se encuentre en este nivel. |
| NIVEL DE SEVERIDAD A | Se considera que el riesgo puede presentarse con una probabilidad o impacto representativo, afectando la adecuada operación de la compañía. Esta es una Zona de Riesgo Grave para que los riesgos se encuentren en este nivel. |
| NIVEL DE SEVERIDAD M | Se presentan eventos de riesgos que comprometen el resultado del proceso. Esta es la zona máxima de tolerancia para mantener los riesgos en una Zona de Riesgo Medio . |
| NIVEL DE SEVERIDAD B | Se presentan eventos en los procedimientos de baja criticidad para el negocio. Esta es una Zona de Riesgo Bajo para mantener los riesgos. |


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At this stage, the identification of new risks that may affect the objectives of the system is understood; therefore, methodologies (segmentation, request for reports, among others) are executed to update the risk profile with a minimum annual frequency or whenever business development requires it.

9.2.7 Risk Tolerance

BIOFIX CONSULTORIA BIC. defines that once risks (probability and Impact) have been identified and assessed, it will accept those that fall within a medium and low range, which in terms of colorimetry in the risk matrix will be shown in yellow and green respectively. Thus, for inherent and residual risks that fall into the extreme and high category (Red or Orange), controls will be implemented to mitigate the risks.

However, if the controls do not ensure sufficient effectiveness to bring the risk(s) to the accepted and approved categories, it must be reported through periodic reports to Senior Management in order to propose action plans and risk mitigation or to define how to address them in another way.

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10. COUNTERPARTY KNOWLEDGE POLICY

It constitutes a fundamental policy for the prevention of bribery and corruption risks that BIOFIX CONSULTORIA BIC. adequately knows the natural and legal persons with whom it will enter into any type of agreement, business, or commercial transaction, particularly those that are aimed at or occur within the framework of an international transaction.

For the aforementioned purposes, the PTEE and SAGRILAFI compliance process has been designed, implemented, and approved, which establishes clear due diligence procedures for counterparts, to know, among other things, who is being negotiated with, what their background is, and what their reputation is.

As described in the following **Due Diligence Procedure**, which is part of the SAGRILAFI and PTEE Compliance process approved by the company.


10.1 DUE DILIGENCE PROCEDURE

Due diligence is aimed at preventing the company from being used as an instrument to carry out activities or operations related to Corruption and Transnational Bribery **C/ST**, allowing for the identification of unusual, suspicious operations and/or risks associated with compliance with the **PTEE**, where all employees and collaborators ensure compliance with all their processes and timely reporting of information for the management and analysis by the Compliance Officer.

This due diligence includes controls such as Documentary File, Verification against restrictive lists, and enhanced due diligence in case of news or alerts regarding counterparts that require it, utilizing the efficient and professional human resources of the company and the physical and technological resources available for risk management, such as the compliance application, information systems for managing process information, all to ensure compliance with the provisions contained in the regulation, which allow for real and transparent information to be known for decision-making and inputs required for compliance with the **PTEE**.

10.1.1 Control Documentary File:

The processes responsible for managing information with counterparts (Passive Clients, Active Clients, Suppliers, Employees, Third Parties, among others) are in charge of collecting, updating, and archiving essential documents as applicable to each person or entity, whether national or foreign.

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For natural persons and national legal entities, the required documents include: citizenship ID, RUT, Chamber of Commerce certificate, and bank certification. For foreign legal entities, the equivalent documents include: TAX ID, passport, Foreigner IN. The Customer Due Diligence Form duly completed and other specific documents required by the process that leads the relationship and/or linkage, depending on the nature of the entity.

No exceptions are accepted in the minimum documentation, and no onboarding and continuity processes are managed if the counterpart does not comply with the due diligence controls that apply to it.

• **Documentary File Update Counterparties.**

This is carried out when counterparts report changes in legal representation, address, or other data, as well as at the request of the Compliance Officer according to the risk management associated with each counterpart.

This documentary update process is carried out annually for recurring counterparts, such as Participating Clients, who lead the Project Management Process and report annual updates of information also for employees and collaborators in the documentary update process managed by Human Management.


This documentation must be supported in the folder of each counterpart as applicable and under the responsibility of the leaders of the engagement and relationship process according to our internal processes.

b. Final Beneficiary Identification

The compliance officer identifies all natural and legal persons associated with the counterpart, verifying the Final Beneficiaries reported in the Customer Due Diligence Form FCC, which are part of the risk management and the controls for verification in restrictive lists.

Therefore, it is important for process leaders to ensure the due diligence and complete information of the legal entities and final beneficiaries reported in the FCC.

10.1.2. Verification Procedure in Restrictive Lists

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The leading areas of engagement manage the SAGRILAF and PTEE compliance management process approved by the company, formally requesting and reporting information to the compliance officer so that they can carry out validation against national and international restrictive lists of the counterparts and final beneficiaries identified in the documentary file to detect and manage risks associated with Corruption / Transnational Bribery / **AML/CFT/FPADM** and corruption.

Types of Concepts Issued by the Compliance Officer:

- **Eligible Counterparty:** A concept is issued for the continuation of the relationship and/or connection with the counterparty without risk and recommendations.
- **Non-Proceeding Counterparty:** An unfavorable concept of connection is issued in case of alerts, counterparty with risk, and requires management approval for its connection.

At this stage, the Compliance Officer issues a written opinion and reports via institutional email to the Process Leader for filing in the counterpart's file evidence of SAGRILAF and PTEE compliance management.

The documentation associated with queries in lists and additional documentation generated from the risk analysis is under the custody and responsibility of the Compliance Officer.


When there is no clarity to issue the opinion, the Compliance Officer will determine to execute the **Enhanced Due Diligence** procedure.

10.1.3 Contractual Clauses Associated with ETHICAL PTEE Policies

In the process of onboarding and its legalization, the leading directions ensure that all contractual documents include the clauses validated by the company that guarantee compliance with our **PTEE** and ethical policies.

If, during the risk management activities of **C/ST LA/FT/FPADM**, it is reported or detected that a counterparty violates compliance with these clauses, the Compliance Officer will conduct verification and consolidate the evidence to issue the respective communications, with a copy to the Legal Department and General Management to be treated as a serious offense, subject to sanctions in accordance with the Internal Work Regulations and/or the legal regulations.

10.1.4 Enhanced Due Diligence Procedure:

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This procedure applies to all third parties that generate any alert signal during the pre-contractual and/or contractual relationship that warrants further information to objectively obtain an analysis of the identified alert and determine whether it should be reported to the Financial Investigation and Analysis Unit or any internal or external control entity. The decision could lead to the conclusion that the relationship and/or linkage should not proceed and/or the continuity of the linkage with the third party should be halted depending on the outcome.

Enhanced due diligence will be applied to the counterparts identified as final beneficiaries in cases of risk, as determined by the compliance officer's analysis.

Enhanced due diligence will be applied to the counterparts identified as politically exposed persons (**PEPs**) who are in an active state and as determined by the compliance officer's analysis.

If a variation of the high-risk profile is identified during the third party profiling process (segmentation), enhanced due diligence should be considered, and measures should be taken according to the results.


If the report generated in the Verification of Restrictive Lists does not provide clarity on the risk associated with crimes related to **Transnational Corruption and Bribery C/ST**, where homonyms are identified, or inconclusive processes or reputational risks in news and others with no clear relation to the counterpart, the compliance officer considers enhanced due diligence for their analysis and assessment.

To carry out this procedure, the compliance officer requests, through communication with the process leader, to manage with their counterpart: - the completion and signature of the Authorization for Data Processing format (**Annex Authorization Format for Data Processing**), - as well as additional information requirements and/or to clarify doubts and/or to rule out or confirm situations or risks identified in the initial due diligence.

The Compliance Officer will carry out the corresponding follow-up in the **Compliance** application, using the available options to request an expanded compliance report.

Management of additional information:

- The Lead Directorate of Engagement will support the collection of the required information, ensuring direct communication with the counterpart to obtain the requested data.
- In cases where the counterparts prefer to send the information directly to the Compliance Officer due to their privacy policies, they

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authorize the use of the email **sgonzalez@biofix.com.co** for this purpose.

This process ensures the necessary traceability and depth to mitigate identified risks, aligning with the highest standards of compliance and transparency, generating the respective alert reports and concepts as applicable.

10.1.5 Relationship and Linking of Politically Exposed Persons (PEPs)

Regarding counterparts categorized as politically exposed persons, they are managed in the following manner:

- Their involvement requires approval from the General Manager or a higher hierarchical level.
- Request the additional completion of the attached Expanded PEPs Format Customer Due Diligence Format.
- Ensure monitoring of the counterparty and follow-up over time on their involvement if approved.
- In accordance with the risk management of PEP counterparts, the enhanced due diligence procedure will be managed if the compliance officer requires it.

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11. CONTRACTUAL PROTECTIONS


Employment contracts and those entered into with third parties must express the contractual obligations, legal resources, and/or sanctions related to improper conduct (including, in the case of business partners, a plan to withdraw from the business, such as a contractual right of termination in the event that the business partner engages in acts of Transnational Bribery or is subject to formal investigation – either preliminary or definitive– for such acts by any local or foreign authority).

Contracts of the company must stipulate that it is mandatory for any type of Counterpart to submit to and comply with the Compliance Policies of PTEE and SAGRILAF, and that it is prohibited to develop, execute, or promote acts of corruption or bribery on behalf of the company or for its account and benefit or that of a third party.

For their part, contracts must indicate that the counterparts are aware of and voluntarily submit to the policies contained in the Business Ethics Program of BIOFIX CONSULTORIA BIC this program also applies to all agents, suppliers, distributors, and other third parties that the company contracts to conduct business on behalf of the organization.

As a control mechanism for the execution of contracts, BIOFIX CONSULTORÍA BIC.:

- It must not channel payments to third parties of any nature, and much less to Foreign Public Officials, through agents, Contractors, or other intermediaries.
- It must verify that the payments made to the counterparts, and in particular To contractors, they are reasonable and align with the value of the goods or services they offer, to prevent undue payments to Foreign Public Officials through counterparts.

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12. Whistleblowing Mechanisms

BIOFIX CONSULTORÍA BIC. has a Whistleblower Channel, which is a fundamental part of the transparency that the Business Ethics Program aims to reflect. Therefore, all collaborators and other stakeholders, regardless of position or location, can report any non-compliance with the Program, as well as report conduct related to bribery, fraud, or corruption, and those that do not align with what is described in the Code of Ethics, Conduct, Transparency, and Anti-corruption.

This tool allows collaborators and stakeholders to easily report any violation of ethical norms or acts of corruption while maintaining anonymity, fostering a corporate culture that recognizes ethical behavior and demonstrates the commitment to prevent and detect actions contrary to the guidelines of this Program, so that each stakeholder can act appropriately when such situations arise.

In this context, inquiries are received through the following channels :


Email: líneaetica@biofix.com.co

The Ethics Line will be managed by the Compliance Officer, who will be responsible for issuing the corresponding report to the Ethics Committee. The information of the person reporting, if provided, will be kept confidential. There will be no reprisals against employees or officials of the Company who report in good faith acts or potential acts of violation of this Program. False or frivolous reports or complaints will not be accepted. If it is proven that the report is false or frivolous, or not made in good faith, such conduct will be considered a violation of the Code of Ethics, Conduct, Transparency, and Anti-corruption of the organization.

It is essential to reiterate that no employee or official of BIOFIX CONSULTORÍA BIC. will be demoted, sanctioned, or face any other adverse consequences for refusing to pay bribes, even if the company loses business as a result.


The information of the person who reports, if provided, will be kept confidential.

There will be no reprisals against employees of the organization who report in good faith acts or potential acts of violation of this Program. False or reckless reports or complaints will not be accepted. In the event that it is demonstrated

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that the report is false or reckless, or not made in good faith, such conduct will be considered a violation of the organization's Code of Ethics, Conduct, Transparency, and Anti-corruption.




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13. MONITORING BY THE COMPLIANCE OFFICER

The Compliance Officer must monitor compliance with the due diligence controls associated with the company's relationship and onboarding processes aimed at preventing risks of **Transnational Corruption and Bribery C/ST** in order to comply with the Business Ethics Program and review, at a minimum, quarterly its proper implementation, execution, and effectiveness, as well as implement necessary improvements according to the internal processes and procedures defined in the SAGRILAF & PTEE Compliance Characterization, managing reported incidents, detected issues, and risks associated with **Transnational Corruption and Bribery C/ST**, and informing Management in case of situations that undermine ethical standards, while managing complaints related to the PTEE through the established channels for their proper management.

The results of the Program's review must be reported to the Shareholders' Assembly and to General Management once a year, who will comment on these reports and take the necessary corrective actions.

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14. INFORMATION TRANSPARENCY

In the development of internal processes, BIOFIX CONSULTORÍA BIC. complies with audits and conducts reviews of the financial statements and the company's accounting, ensuring that the financial information reflects the true asset and economic situation of the Organization and its transactions. Through the Fiscal Review and Internal Control.


The company, for its part, keeps available for inspection the books and records that document all financial transactions accurately and clearly. The Organization does not maintain "parallel accounts" or double accounting.

BIOFIX CONSULTORÍA BIC subjects its internal control systems, accounting practices, and documentation to review and analysis by the audit bodies, internal control, and fiscal review.

In accordance with the above, the organization guarantees that:

- All its financial transactions are properly identified and recorded accurately and clearly in appropriate books and records, which are available for inspection by its Shareholders' Assembly, the audit, internal control, and fiscal review.
- There are no "parallel" or secret accounts, and no documents are issued that do not faithfully and accurately record the transactions to which they refer.
- There are no records of non-existent expenses, or liabilities without correct identification of their purpose, or transactions that do not have a genuine and legitimate purpose.
- Payments in cash or in kind are not made.
- Accounting books or other relevant documents are not intentionally destroyed before the time established by law.
- Independent auditing systems exist, through fiscal auditors, to identify any transaction that violates the Anti-Bribery Policies or other applicable accounting standards.


The Organization seeks to ensure that employees are timely and meticulous when preparing all reports and records required by Senior Management. Employees must not prepare or accept false invoices or records from third parties.

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or from service suppliers. Among the practices that are prohibited at BIOFIX CONSULTORÍA BIC are:

- Making records show a payment to one person when in fact the payment was made to another.
- Creating a fund to pay a bribe.
- Submitting false or inaccurate expense reports.
- Create records that inaccurately characterize the true nature of a payment or a transaction.




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15. Document and Record Retention

BIOFIX CONSULTORÍA BIC does not allow the celebration and execution of business, operations, and contracts without the respective internal or external support, duly dated and authorized by those involved in them or who prepare them. These documentary supports will serve the organization to verify the traceability of the business and, if applicable, the diligence in preventing acts related to bribery and corruption.

The retention and archiving of such documents and supports will be in accordance with the provisions of Article 28 of Law 962 of 2005, (Congress of the Republic, 2005) or the regulation that modifies or replaces it. That is, documents and records must be retained for a period of ten (10) years from the date of the last entry, document, or receipt, and the organization may choose to retain them in paper format or in any technical, magnetic, or electronic medium that ensures their exact reproduction.


The management file of the counterparts is under the custody of the leaders of the Executive Level linkage and relationship process, and the databases of reports generated from the compliance process are also under the custody of the Compliance Officer.

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16. Due Diligence in Business Reorganization Processes (Mergers, Acquisitions, Asset Purchase, Shares or Interest Parts, Stocks)

Due diligence processes will be carried out to identify liabilities and contingencies, and they must also be conducted to understand legal entities and their representatives with whom any type of business reorganization processes, such as asset purchases, stocks, shares, or interests, or any other procedure, is intended; this is to avoid contagion risks associated with Transnational Bribery.

Consequently, in each negotiation process and investment analysis, the organization will conduct due diligence on compliance with regulations associated with anti-corruption and anti-bribery programs before making a final decision regarding the investment or merger. Likewise, in the event that the acquisition or merger is finalized, BIOFIX CONSULTORIA BIC will ensure that the acquired company implements, within a reasonable timeframe, the internal control systems and the present Business Ethics Program according to the existing standards in the Company.

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17. Training, Evaluation, and Information Disclosure


The Company, along with the compliance officer, will carry out training activities related to the PTEE for all employees and stakeholders, which will have the following characteristics:

or Induction Trainings will be given to new permanent employees and temporary employees upon their entry, either in person or through alternative methods such as e-learning, which will be accompanied by evaluations to assess the knowledge acquired about the System.

or Training for external third parties aims to inform about the PTEE system through mass communications via email.

- The training and development process will take place at the time of onboarding, during any required reorientation processes, and at least once (1) a year, whether in-person or virtually.
- Training plans must be reviewed and updated according to any changes that occur.
- In evaluations conducted during onboarding or knowledge strengthening, if an employee does not pass the first (1) evaluation, a re-evaluation will be conducted. If they fail again, they will receive feedback from the Compliance Officer. If this issue persists, administrative measures deemed appropriate will be taken. Evaluations conducted in person will be sent to the human resources responsible party for filing and safekeeping once graded.
- A record of the trainings conducted must be maintained, which includes the date, topic covered, names of attendees, and evidence of the evaluation.
- As a result of the training, the staff will be at least capable of identifying unusual or suspicious operations within the Company's operations.

BIOFIX CONSULTORIA BIC promotes the proper officialization, publication, implementation, and functioning of its policies, procedures, and other documentation related to the **PTEE**, ensuring their consultation on the institutional website and also within the company.

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18. SANCTIONS

Sanctions for violating national Anti-bribery standards can result in severe penalties for the organization and its administrators and associates. Employees of BIOFIX CONSULTORÍA BIC who violate this Program or the Anti-Bribery Policies will be subject to sanctions and disciplinary measures, including dismissal for just cause in accordance with the provisions of the internal regulations and the Substantive Labor Code, without prejudice to any legal actions that may be pursued for this reason.

BIOFIX CONSULTORIA BIC will apply disciplinary measures fairly and promptly, proportional to the violation. By decision of the Shareholders' Assembly, following the Compliance Officer's pronouncement, the Organization will report any violations of the Anti-bribery regulations that it becomes aware of in the course of its activities to the competent authorities.

BIOFIX CONSULTORIA BIC will not bear the costs related to the defense or sanctions imposed on a High Executive, an administrator, or an employee or official for violating the Anti-bribery regulations.

19. DUTY OF CONFIDENTIALITY


All officials of BIOFIX CONSULTORÍA BIC. commit to appropriately manage the information they come to know about cases of fraud, corruption, and bribery, and for this, they will comply with the Personal Data Protection policy of the organization.

20 UPDATES AND DISCLOSURE

This manual must be reviewed and updated at least once (1) a year by the Shareholders' Assembly and the Compliance Officer and/or when new legal or internal regulations of the Company need to be considered.

21 VALIDITY

This manual will come into effect once it is published and approved by the Shareholders' Assembly of the Company.

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22 UPDATE CONTROL

This Business Transparency and Ethics Program will be updated as necessary; in this regard, the Shareholders' Assembly of BIOFIX CONSULTORÍA BIC. will be responsible for approving all changes proposed by the Compliance Officer regarding the current policies, guidelines, methodologies, processes, and procedures.

The process of reviewing and updating the PTEE will be the responsibility of the Compliance Officer in coordination with Management and Executive Level, taking into account international standards and regulations issued by local authorities in the jurisdictions where operations are conducted, as well as in accordance with changes in the internal policies of BIOFIX CONSULTORÍA BIC.

Annex SAGRILAF & PTEE Compliance Process Annex
 Risk Matrix Annex Code of Ethics Transparency and
 Anti-corruption Annex Business Transparency and Ethics
 Program Annex SAGRILAF Manual

| DATE | VERSION | NATURE OF CHANGE |
|------------------|---------|-----------------------------|
| June 2021 | 1 | Initial Documentation |
| 2022 | 2 | Manual Update validity |
| 2023 | 3 | Manual Update validity |
| 2024/12 | 4 | Manual Update validity 2025 |