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## **INTRODUCTION**

Dear Stakeholders,

At Química Líder, we are firmly committed to integrity, honesty, and responsibility in all our operations.

We are pleased to present a summary of our Corporate Transparency and Ethics Program (PTEE), a fundamental framework that guides our conduct and business relationships. This program is a clear demonstration of our commitment to best business practices and the creation of an environment of mutual trust.

### **Our Strong Commitment to Ethics and Transparency**

Química Líder's PTEE reflects the unwavering dedication of our Senior Management to uphold ethical and transparent conduct in every interaction.

Our main objective is to foster an organizational culture that prioritizes ethical values, adopting a zero-tolerance policy toward corruption and bribery.

This program is mandatory for all our staff and extends to all our stakeholders, including our valued customers, suppliers, distributors, and contractors, ensuring that we all operate under the same high standards of integrity.

# 1. POLICIES OF THE CORPORATE TRANSPARENCY AND ETHICS PROGRAM

## 1.1. TRANSPARENCY AND INTEGRITY POLICY

Química Líder has a zero-tolerance policy toward corruption in all its forms.

The company does not accept any justification for violating the law and has therefore implemented due diligence measures aligned with the highest international standards. These measures include mechanisms for the prevention, detection, control, and reporting of corruption, transnational bribery, and any other corrupt practices.

Additionally, the company has established seven (7) fundamental principles that must guide all actions at every level and are integrated with the organization's ethical principles:

- **Principle of Legality:** All employees of Química Líder are committed to complying with the Colombian Constitution and laws, as well as with the company's internal policies and regulations set by authorities. Employees involved in international business must be aware of and comply with the laws and internal regulations of the country where they operate.
- **Conflict of Interest:** Employees are prohibited from offering or accepting gifts of any value, including money, loans, bribes, or similar monetary benefits. Química Líder expects its staff to uphold the highest ethical standards in relationships and negotiations with suppliers and clients. Therefore, it is strictly forbidden to give or receive personal benefits or advantages for themselves, their families, or third parties.
- **Respect for Clients:** Química Líder maintains business relationships with its clients based on service, quality, punctuality, and respect. Employees must not offer gifts, benefits, or reimbursements that could violate client policies or laws. Employee conduct should aim to maintain client loyalty and satisfaction, as clients are fundamental to the company.
- **Respect for Suppliers:** Química Líder seeks to maintain a relationship of mutual respect with its suppliers, ensuring a continuous and stable supply of quality products and fair negotiation practices. It is prohibited to solicit, give, or receive benefits, loans, or gifts of any kind. Employees are forbidden from obtaining personal benefits for themselves, their families, or third parties from this business relationship, including gifts or invitations that could compromise their independence.
- **Use of Information:** Employees must not seek personal advantage for themselves, their families, or third parties through the use of privileged or confidential information, or opportunities arising from their position at Química Líder. Commercial, technical information and specifications shared with or received from suppliers or customers must be used exclusively for business purposes and must not be disclosed to third parties, as this information is the property of Química Líder.

- **Principle of Good Faith:** Employees must act with good faith, diligence, and care, respecting others and complying with the law. They must prioritize Química Líder's principles and values over personal interests when making decisions.
- **Principle of Loyalty:** Out of loyalty to Química Líder, employees must promptly inform their immediate supervisors about any incident or irregularity committed by another employee or a third party that could harm or negatively affect the interests of the company, its clients, shareholders, or executives.

In accordance with the above, all employees of Química Líder, regardless of their type of engagement, are responsible for the proper and correct implementation of the Corporate Transparency and Ethics Program. Management fully supports employees in acting in line with the principles established in this document.

Química Líder's Management values and recognizes the effort and commitment of those who act with integrity and safeguard ethics in business management.

Following best practices, Química Líder adopts procedures, protocols, and control and reporting mechanisms—including the Transparency Line—to ensure the prevention, identification, and management of unlawful acts and behaviors that lack legitimacy and transparency.

Química Líder strictly prohibits any form of bribery or corrupt act and requires full compliance with all applicable anti-corruption and anti-bribery laws.

It is essential to prioritize adherence to ethical principles and values over the mere achievement of company goals, and it is considered critical to foster a culture committed to applying and enforcing the policies of the Corporate Transparency and Ethics Program.

All employees of Química Líder must be familiar with and comply with all policies and procedures that are part of the Corporate Transparency and Ethics Program.

Employees with authority to make purchases or negotiate at a national or international level must perform due diligence to appropriately understand third parties, paying particular attention to their potential connection with government entities or public officials before finalizing any transaction or negotiation.

To do this, they must apply the provisions of this Corporate Transparency and Ethics Program and follow the procedures outlined in Section 2.

### **1.1.1. PRACTICES THAT VIOLATE TRANSPARENCY, INTEGRITY, AND BUSINESS ETHICS**

The following behaviors are considered completely unacceptable and contrary to our Corporate Transparency and Ethics Program (PTEE):

- **Conflict of Interest**  
Any circumstance that may compromise the independence, fairness, or objectivity of a Química Líder employee's actions and may harm the interests of the company.
- **Bribery**  
Bribery can be defined as the giving or receiving of something of value (typically money, gifts, loans, rewards, favors, commissions, or entertainment) as an improper inducement or reward to obtain business or any other benefit. Bribery may occur in the public sector (e.g., bribing a national or foreign public official) or in the private sector (e.g., bribing an employee of a client or supplier).
- **Corruption**  
Any deliberate act or omission to obtain a personal benefit or one for third parties, regardless of whether it has financial implications. It is classified into two types:
  - **Internal:** A company employee accepts a bribe from a third party to favor them in decision-making.
  - **Corporate:** A company employee offers a bribe to a government official or third party so that their decisions or actions benefit Química Líder or a specific employee.
- **Fraud**  
Intentional acts or omissions intended to deceive, misappropriate assets, or manipulate information to the detriment of the company. This includes, among other things, generating false reports, misuse of confidential information, irregular behavior in procurement processes to obtain favors, destruction of information, money laundering, and cyber fraud.

### 1.1.2. PROGRAM FOR ENSURING CORPORATE TRANSPARENCY AND ETHICS

In alignment with Química Líder's principles of transparency and integrity, a corporate program has been implemented to ensure legitimate and transparent conduct. This program has the following objectives:

- Promote and ensure the performance of actions and behaviors within Química Líder that comply with legal and internal standards and ethical business practices.
- Regulate mechanisms and procedures for preventing actions that are contrary to this program.
- Establish due process in order to identify and determine the responsibilities of individuals involved in non-transparent acts.

The program includes the following elements:

- **INTEGRATE and COORDINATE** the necessary actions to prevent and control potential situations of fraud, bribery, and corruption.
- **CREATE** a transparent environment by integrating various systems developed to prevent and detect actions contrary to the law and internal policies, while maintaining appropriate channels to facilitate the reporting of such matters within Química Líder.
- **PROMOTE** an organizational culture based on the principle of legality and transparency and on the application of fundamental ethical principles and responsible behavior from all members of Química Líder, regardless of their position in the hierarchy.
- **IDENTIFY, DEVELOP, and IMPLEMENT** adequate procedures for the prevention, detection, and handling of behaviors not in accordance with legal standards within Química Líder, striving for continuous improvement. Risk identification and assessment must follow the risk methodology and policy defined by Química Líder.
- **ENSURE** due process in handling investigations of any alleged fraudulent, bribery, or corruption act, respecting the dignity and rights of the individuals involved, guaranteeing confidentiality of the information, and proportionality of corrective actions. Individuals who report violations of the Corporate Transparency and Ethics Program in good faith are protected against any form of retaliation.
- **FOSTER** the duty of loyalty among employees by encouraging them to responsibly report any suspected fraud they become aware of.

## **1.2. POLICIES REGARDING INTERACTION WITH PUBLIC OFFICIALS OR SERVANTS**

### **1.2.1. EXPENSES FOR GIFTS, TRAVEL, AND ENTERTAINMENT FOR NATIONAL OR FOREIGN PUBLIC OFFICIALS**

Employees must not request, accept, offer, or provide gifts, entertainment, hospitality, travel, or sponsorships with the intent to induce, support, or reward improper conduct related to obtaining any business involving Química Líder.

Gifts, entertainment expenses, or other courtesies for the benefit of a public official or servant are not permitted.

If any courtesy is considered, its value must not exceed USD 50 and must comply with the company's **Gifts and Courtesies Policy**.

### **1.2.2. NEGOTIATIONS WITH AGENTS, INTERMEDIARIES, AND FACILITATION PAYMENTS**

At Química Líder, intermediaries or third parties must not be used to make inappropriate payments.

Facilitation payments (payments made to a government official or business person to expedite a procedure) are strictly prohibited.

Such payments must not be made to public officials—even if they are a common practice in a given country.

### **1.3. TRAVEL EXPENSES**

Química Líder has established a **Travel Expenses Policy**, which is published in the company's internal system and communicated to applicable personnel based on the roles that require travel.

Under no circumstances may employees incur unauthorized or additional expenses that lack proper justification in accordance with the principles, rules, and values outlined in the PTEE and the **Code of Professional Conduct and Ethics**.

Likewise, employees must not use the resources provided by Química Líder for purposes other than those authorized, nor may they divert the intended purpose of such resources for personal benefit or for the benefit of third parties.

### **1.4. COMPENSATION AND COMMISSION PAYMENTS**

Química Líder has established parameters within its accounting software for recognizing commissions in the commercial area, as well as within the initial employment proposals. These terms also apply in other contractual agreements where applicable.

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

All contracts or agreements entered into by Química Líder must include anti-bribery and anti-corruption clauses, declarations, or guarantees, and must establish the right to terminate the agreement in the event of a violation of this program or any applicable anti-corruption laws or regulations.

In all cases, the party responsible for the negotiation must ensure that these clauses are included prior to the signing of the contracts or agreements.

### **1.6. DONATIONS AND POLITICAL CONTRIBUTIONS**

Química Líder does not make political donations or contributions. All donations made are directed toward non-profit entities, foundations, or similar organizations, must have a lawful purpose, and must be accompanied by a valid donation certificate signed by the entity's statutory auditor.

All donations must comply with the company's established Donation Policy.

## **2. REPORTING MECHANISMS**

Química Líder provides the following mechanisms to report any situation, act, or behavior that may potentially violate the principles described herein:

### **2.1.1. TRANSPARENCY AND INTEGRITY LINE (LTI)**

As a preventive measure, Química Líder S.A.S. provides a Transparency Line through which all employees, regardless of their position, as well as other stakeholders, may raise concerns or seek advice regarding compliance with the Corporate Transparency and Ethics Program. It can also be used to report conduct that falls within any form of bribery or corruption.

All reports are handled in detail, ensuring the confidentiality of the information and the individual reporting the matter, who will be protected against any form of retaliation.

Contact: [linea.etica@quimicalider.com](mailto:linea.etica@quimicalider.com)

#### **KEY POINTS ABOUT THE TRANSPARENCY LINE:**

- It is different from the customer service line.
- It is not a tool for complaints or claims but is intended solely for reporting conduct that violates Química Líder's standards of transparency and integrity.
- It is not for suggestions or handling labor or personal matters.
- It must be used responsibly.
- The facts reported must be real and verifiable.

### **2.1.2. INTERNAL REPORTING OF COMPLAINTS**

If an employee or stakeholder wishes to directly report conduct that falls within the categories that violate Transparency, Integrity, and Business Ethics, they may do so via the ethics line. Reports are received online, ensuring confidentiality and protection against any form of retaliation.

Website: <https://quimicalider.com/linea-etica/>

### **2.1.3. REPORTING TO AUTHORITIES**

The Superintendence of Companies (Superintendencia de Sociedades) has provided the following reporting channels for cases involving corruption or transnational bribery committed by Colombian legal entities or foreign entities operating in Colombia:



- **Report of Transnational Bribery:**  
[Transnational Bribery Reporting Channel – Business Affairs – Home](#)
- **Report of Corruption Acts to the Secretariat of Transparency:**  
[Colombian Anti-Corruption Portal - PACO](#)

### **3. DUE DILIGENCE**

As part of the company's anti-corruption and transnational bribery prevention efforts, the PTEE program includes all activities, procedures, and effective methodologies to protect against such risks. Proper knowledge or due diligence regarding each of the company's third parties or counterparts involves a timely and appropriate analysis of personal information, business activity characteristics, and market involvement. This must be done before entering into any commercial or contractual relationship, or when red flags arise.

#### **NATIONAL SUPPLIERS**

Due diligence must be conducted for national suppliers with recurring monthly transactions exceeding COP 9,900,000 (or the equivalent in minimum monthly wages), or as outlined in the Business Partner Matrix – Suppliers (in process). This involves verifying compliance with procedure P-CP-2 SUPPLIER MANAGEMENT. For non-recurring or smaller-volume suppliers, minimum documentation will be requested, as specified in the same procedure.

For the appointment of the statutory auditor, in addition to the due diligence under P-CP-2, certification of user and password registration in the SIREL system before the UIAF will be required.

#### **FOREIGN SUPPLIERS**

Due diligence for foreign suppliers will be conducted as outlined in the P-CP-2 SUPPLIER MANAGEMENT procedure, without monetary thresholds.

#### **BUSINESS PARTNERS – CLIENTS**

Due diligence must be conducted for all new or renewed client relationships, both national and international, without monetary thresholds, as defined in procedures I-AF-4 CLIENT ONBOARDING AND REVIEW, and F-CM-2 CLIENT ONBOARDING AND/OR CREDIT APPLICATION.

#### **EMPLOYEES**

For new hires, due diligence is applied to all staff as specified in procedure P-RH-1 SELECTION, HIRING, ROLE CHANGE, AND EMPLOYEE TERMINATION.

#### **SHAREHOLDERS**

For onboarding new shareholders, due diligence will be carried out according to document MS-AF-1 SAGRILIFT MANUAL at the time required.

The responsibility for effective due diligence lies with the department conducting the counterparty's contracting process. This includes verifying watchlists and reviewing commercial, reputational, and legal backgrounds, including administrative, criminal, or disciplinary sanctions that may affect the individuals subject to due diligence, along with the required declarations submitted by the counterparty before contracting.

If an anomaly related to corruption or transnational bribery is identified, it must be reported to the Compliance Officer so that enhanced due diligence may be carried out.

### **3.1.1. ENHANCED DUE DILIGENCE C/TB**

Enhanced Due Diligence (EDD) is the process through which Química Líder applies additional and more intensive measures to assess a counterparty. The Compliance Officer or their delegate will determine the need to conduct this type of review, based on risk assessment and applicable regulations. It is typically applied to parties linked to corruption or transnational bribery (C/TB) offenses or to Politically Exposed Persons (PEPs).

The company has defined the following procedures, which include the necessary elements to identify and evaluate the counterparty and detect red flags related to C/TB risks:

#### **When is EDD applied?**

The Compliance Officer must apply EDD in the following cases:

- **Politically Exposed Persons (PEPs):** Public officials, former officials, their relatives, and individuals with close ties to them.
- **Counterparties in non-cooperative countries:** Countries that do not comply with international anti-corruption standards.
- **Other high-risk cases:** When the company identifies a high risk of corruption or transnational bribery.

#### **What steps are involved in EDD?**

- **Identification and analysis of the counterparty:** Gather information about the counterparty, their business, operations, products, and transaction volumes.
- **Verification of information:** Confirm the information using reliable sources such as official documents, public records, and databases.
- **Risk evaluation:** Identify and assess corruption and transnational bribery risks associated with the counterparty.

- **Taking action:** Implement measures to mitigate identified risks, such as requesting additional information, conducting site visits, or signing contracts with anti-corruption clauses.

## 4. SANCTIONS FOR NON-COMPLIANCE WITH THE PTEE

The provisions in this procedure are mandatory for all employees responsible for its execution. Any violation or non-compliance is considered a **serious offense** and will result in disciplinary measures as outlined in the company's internal work regulations.

Any employee who becomes aware of any of the behaviors described in section 4.2 of this document must report it immediately through the channels established in the Corporate Transparency and Ethics Program—either to the Compliance Officer, their direct supervisor, or, if not appropriate, through the Transparency Line or official reporting form. If reported to the supervisor, they must escalate it to the Compliance Officer within 24 hours.

The same procedure applies for any breach of the policies associated with the PTEE.

In these cases, the employee is entitled to the following protections:

- **Confidentiality** regarding the information and identities involved.
- **Presumption of good faith:** When someone reports misconduct, it is presumed they are acting in good faith, based on real indications or evidence.

If the person under investigation is an employee, the Compliance Officer will initiate the disciplinary process in accordance with internal regulations and applicable labor laws.

### 4.1.1. CORRECTIVE ACTIONS

In matters involving employees of Química Líder, action will be taken in line with labor laws and the company's internal work regulations.

**Suppliers and clients** must comply with the terms of the legal agreements governing their obligations and rights. If necessary, legal provisions will be used to terminate the relationship.

**Government authorities:** If applicable, a formal complaint must be submitted to the competent regulatory bodies.

## 5. DOCUMENTATION MANAGEMENT

The filing and retention of documents related to national or international business or transactions must comply with Química Líder's **document management program** and retention schedules.

Química Líder must maintain accounting records and logs that accurately and precisely reflect all executed transactions.

Employees are **prohibited** from altering, omitting, or falsifying records to hide improper activities or misrepresent the nature of any recorded transaction.

The company has implemented **internal controls** to prevent bribes or improper payments from being hidden or disguised in transactions labeled as: commissions, fees, sponsorships, donations, representation expenses, or any other item that could conceal the true nature of the payment.

## **6. UPDATES**

This program must be reviewed, updated, and approved **at least every two (2) years** by the Board of Directors or the highest governing body, or earlier if required by new legal or internal regulations.

Any changes will be communicated to all employees and relevant stakeholders.