

ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY
(ADL AND ECOSISTEMAS)

COUNTERPARTIES GUIDELINES

INTEGRAL RISKS MANAGEMENT

Reviewed by: Mónica Velandia Gómez Risks Analyst Sr.	Approved by: Ana María Castañeda Risks Manager
Approval Date:	05/26/2025

Any copy printed or magnetically stored in means different from this document intranet constitute in not controlled copies.

(carroya.com, facilpass, metrocuadrado, Seguros ADL, ADL logos)



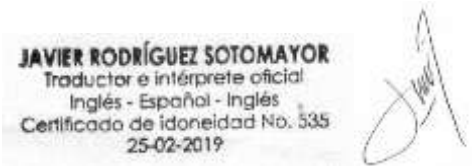
ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

Content	
1. OBJECTIVE	4
2. SCOPE	4
3. REGULATORY FRAMEWORK	4
4. GENERAL ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY	5
5. STAGES FOR THE ADMINISTRATION OF FRAUD, BRIBERY AND CORRUPTION RISK	5
5.1. IDENTIFICATION STAGE	5
5.2. ASSESSMENT OR EVALUATION STAGE	6
5.3. CONTROL STAGE	6
5.4. MONITORING STAGE	6
5.4.1. SIMPLIFIED DUE DILLIGENCE PROCESS	7
5.4.2. INTENSIFIED DUE DILLIGENCE PROCESS	7
6. GENERAL GUIDELINES	8
6.1. GIFTS, HOSPITALITIES, INVITATIONS AND GRATUITIES	8
6.1.1. CONDITIONS TO AWARD	8
6.2. SPECIAL OPERATIONS	9
6.2.1. PUBLIC AND/OR POLITICAL CONTRIBUTIONS	9
6.2.2. DONATIONS AND SPONSORSHIPS	10
6.3. PREVENTION OF FRAUDULENT REPORTS	10
6.3.1. ACCOUNTING RECORD	10
7. GUIDELINES ON CORRUPTION	10
7.1. CONFLICT OF INTEREST	10
7.2. BRIBERIES	11
7.3. PAYMENTS TO SPEED UP PROCESSES AND PROCEDURES	12
8. RESPONSES BEFORE FRAUD, CORRUPTION AND BRIBERY	12
8.1. REPORT OF EVENTS	12
8.2. CONDUCTS THAT MUST BE REPORTED	13
8.2.1. CORRUPTION	13
8.2.2. ACCOUNTING FRAUD	13



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

8.2.3. ASSETS EMBEZZLEMENT	14
8.2.4. INFRINGEMENT OF INTELLECTUAL PROPERTY	15
9. INVESTIGATION PROCESS	15
9.1. CONSEQUENCES OF BREACHES	16
10. AWARENESS AND TRAINING	16
11. UPDATING AND DISCLOSURE OF THE POLICY	17
12. INTERNAL AUDIT	17
13. PRESERVATION OF INFORMATION	17
14. TYPE OF INFORMATION	17
15. ENFORCEABILITY	18
16. CHANGES CONTROL	18



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

1. OBJECTIVE

In order to assist protecting Companies and their collaborators against damages, sanctions and other related legal or reputational consequences, derived from acts of fraud, bribery and corruption, this Policy establishes the Companies position of zero tolerance in respect of acts of bribery and corruption, the key requirements and responsibilities for the collaborators and the management, including the government processes and agreements.

2. SCOPE

The Antifraud, Antibribery and Anticorruption policy applies for all suppliers, customers, third parties or strategic allies with which ADL Digital Lab, Carroya, Metrocuadrado, Seguros ADL and Facilpass, hereinafter “The Companies” have commercial, business, contractual or judicial links, of any nature.

3. REGULATORY FRAMEWORK

The need to define and adopt an Antifraud, Antibribery and Anticorruption program is based on the following regulatory provisions:

- External Circular 100 – 000011 issued by the Superintendence of Societies on August 9, 2021, which integrally modifies External Circular No. 100-000003 of July 26, 2016 and addition of Chapter XIII of the Basic Judicial Circular of 2017 integrally.
- Act 1778 of 2016 which dictates standards on the responsibility of legal persons for transnational corruption acts, and other provisions are dictated with regard to the fight against corruption, among which there is the sanctioning regime.
- Act 2195 of 2002 which adopts measures with regard to transparency, prevention and fight against corruption.
- Colombian Criminal Code and Colombian Anticorruption Statute (Act 1474 of 2011). The Colombian Criminal Code typifies the conducts of graft, bribery, concussion, improper entering into contracts and influence peddling, among others, as crimes against the public administration. Likewise, the Colombian Anticorruption Statute dictates standards addressed to strengthen the mechanisms of prevention, investigation and sanction of corruption and the effectiveness of the public management control.
- Foreign Corrupt Practices Act or FCPA as a reference for the implementation of our Antifraud, Antibribery and Anticorruption System. This Policy incorporates the key principles that usually make up the basis of the current national and international laws against bribery and corruption.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

4. GENERAL ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY

The Companies set the guidelines to prevent detect, investigate and correct events of fraud, bribery and corruption under the premise of zero tolerance in this type of events. For this, the High Management priority is to look after the fulfillment of the following aspects:

- To manage the risks of fraud, bribery and corruption associated with the business and their relationship with third parties; to verify and prevent the suitability of its fraud, bribery and corruption control environment.
- To continuously promote an ethical culture as an indispensable element for the prevention, detection, investigation and remedy of fraud, bribery and corruption.
- To prevent the damages to the image and reputation of the Organization through the adoption and fulfillment of the national and international normativity that forbid the performance of actions constituting fraud, bribery or corruption.
- The Companies search to implement methodologies and tools for the presentation and record of the information that allows to administer, control and mitigate the risks associated with fraud, bribery or corruption.
- All the collaborators of the Companies must meet the Ethics Code of the Organization in compliance with the antifraud, anticorruption and antibribery practices.
- The Companies continuously monitor the commercial relationship with third parties in order to mitigate the risk of the Organization that is civilly or criminally liable, or suffers a regulatory sanction or a damage to its reputation as a consequence of an illegal act carried out by a third party.
- Should an officer of the Company become aware of a situation that suggests the possibility of the existence of an improper behavior, it must carefully review the establishment or maintenance of a commercial relationship with the third party and to escalate the case to the compliance officer or to whoever acts as such, to make a decision.

5. STAGES FOR THE ADMINISTRATION OF THE RISK OF FRAUD, BRIBERY AND CORRUPTION

5.1. IDENTIFICATION STAGE

- Classify the risk factors of fraud, bribery and corruption.
- Establish the conditions and priorities to execute the Due Diligence measures.
- Have in place and implement the mechanisms and measures that allow a proper knowledge, identification and individualization of the Risk Factors of corruption and bribery applicable to the nature of ADL and its companies, considering that the main risk source for entities are the country, collaborators, customers, suppliers and third parties and intermediaries.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

5.2. MEASUREMENT OR EVALUATION STAGE

Once the identification stage for the Risk of fraud, corruption, transnational bribery and bribery is concluded, ADL Digital Lab and its companies must be allowed to measure the possibility or probability of occurrence of the inherent risk, in the light of each of the risks of fraud, corruption and bribery, including the transnational ones, as well as the impact in the event of materializing, through the associated risks. These measurements may be of qualitative or quantitative nature and shall be performed through the risks matrix as of the methodology designed by the Companies.

5.3. CONTROL STAGE

The ABAC Program must allow ADL Digital Lab and its companies to design and apply the controls for the inherent risk the Company is exposed to, as of the grading of the controls that will allow the treatment of such risks, the residual risk is determined.

The control must be translated into a decrease of the possibility or probability of materialization or for the caused occurrence impact for the Risk of fraud, corruption and bribery, including transnational bribery or of the impact in the event of materializing.

To control the Risk of fraud, corruption and bribery, ADL Digital LAB and its companies shall adopt the design and establishment of methodologies and the creation of a risk matrix for fraud, corruption and bribery, to define the most suitable control mechanisms and their application to the identified risk factors.

5.4. MONITORING STAGE

With the purpose of verifying and evaluating in a periodic way the effectiveness of the ABAC system, its guidelines and controls designed by ADL and its companies, to improve the quality, effectiveness, and application in the processes and its results, the following actions must be performed:

- ADL Digital Lab and its companies shall perform a monitoring of the legislative, regulatory or other type of changes that may have consequences regarding the internal and external policies of ABAC. In the event of identifying a change, an impact analysis shall be conducted for the inherent risk as of the internal and external context of the companies and any modification shall be documented.
- Perform monitoring in the grading of the controls in order to ensure its proper operation and to timely mitigate all the identified risks.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

5.4.1. PROCESS OF SIMPLIFIED DUE DILLIGENCE

The Due Diligence is addressed to provide Companies with the necessary elements to identify, evaluate and treat the Risks of fraud, corruption, bribery and transnational bribery related to the Companies activities, their subordinate societies or their suppliers, collaborators, customers, third parties or strategic allies. The Due Diligence scope shall be applied as of the companies subject and nature, the type of contracting, the amount of performed transactions with the counterparties and the countries where they perform their activities, among other aspects.

The Due Diligence processes must be undertaken prior to the binding and updating of the counterparties which have a contractual relationship with the Companies, once every two (2) years as a minimum, or every time it is necessary in accordance with the changes in judiciary and reputational conditions of the Counterparty, through the periodic review of its initial conditions and any variation thereof.

For the proper knowledge of the counterparties, the focal points in charge of the binding and updating of the counterparties, they must validate the binding or updating form set by the company so that it is properly and fully processed. The form, the requested documentation and the result of consultations in lists, must be archived as a support, in a digital format in the counterparty folder, and guarded by the area in charge of the binding and/or updating.

In the event of identifying any coincidence generated by the lists consulting tool, the focal point must escalate the case within the tool itself for the Risk Unit (SAGRILIFT and ABAC) to perform the intensified due diligence process, in order to confirm or rule out the coincidence, and to establish the counterparty exposure level based on the findings and the performed analysis.

5.4.2. PROCESS OF INTENSIFIED DUE DILLIGENCE

For the events an advanced knowledge of the counterparty is required, of its reputation and relationships with third parties, or of the origin and behavior of its operations that represent a greater C/ST risk, the Companies shall carry out the Intensified Due Diligence process, which contemplates the most rigorous analysis of the exposure of C/ST risks, elements of judgement to identify conducts associated with the concealment of indirect payments of bribes or handouts to national public servers or Foreign Public Servers, dishonest activities by members of the High Management, collaborators and/or third parties that act against the entity interests or may generate a risk of contagion within the framework of their contractual relationship.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

6. GENERAL GUIDELINES

6.1. GIFTS, HOSPITALITIES, INVITATIONS AND GRATUITIES

The Companies have arranged the following criteria prior to receive or give gifts, hospitalities, invitations and gratuities:

6.1.1. CONDITIONS TO GIVE

The Companies Collaborators are forbidden to give or to promise as a gratuity or gift, with the Company resources or on behalf of the entity, money, bonuses, fees, commissions, down payments, travel expenses, cheques, debit cards, entertainment, securities or any other document that may be convertible to money, as well as any other thing of value, to a third party with whom the Companies have business.

To protect the companies that undertake the promotion of their products and business activities in a normal and legit way, the following exceptions are set, where:

The payment, gift, offering or promise of anything of value, is:

- Legit, pursuant to the regulation.
- A reasonable expense and in good faith, such as travel and accommodation expenses, incurred and directly related to:
 - The promotion, demonstration or explanation of products or services.
 - The execution or performance of a contract with the government or an entity thereof.

With the above, notwithstanding the general policy, it is allowed to make gifts, hospitalities or gratuities to third parties, provided that:

- They are promotional items such as umbrellas, hats, pens, calendars, agendas, representative of the Companies, their subordinate entities or enterprises with which they make business or may make business.
- They are gifts, hospitalities or invitations to events related to the normal course of business, such as: breakfast, lunch, dinner, cocktails, workshops, seminars, presents, courtesies, travels and, in general, activities for the demonstration of services or products, as of the social subject of each entity.

Note: Any granting of gifts, hospitalities, invitations and/or gratuities must be reported by the collaborator through the form [TRV-GIR03-FR-02 Reporte de Regalos y/o Atenciones Recibidas u Otorgadas](#) and for the High Management members the form [TRV-GIR03-](#)

ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

[FR-04 Reporte de Regalos y/o Atenciones Recibidas u Otorgadas - Alta Gerencia](#), available at the processes site.

6.2. SPECIAL OPERATIONS

The Companies are committed with the fulfillment of the highest standards of ethical conduct, and restrict the offering of gifts, donations and sponsorships, among others, when its purpose consists of obtaining an improper advantage. As accepting any gift, donation or sponsorship that may be granted by the society, its beneficiary must certify that it is duly authorized for that as of the applicable laws and the internal provisions of the organization with which they have a work association. In such sense, they reserve the right to restrict the granting of gifts, donations and sponsorships, in accordance with the applicable policies and legal normativity.

In the event that any counterparty related to the company becomes aware of the improper allocation of the gift, donation or sponsorship granted by the Society, or that its goal is a corrupt purpose or effect or the obtention of an improper advantage, it must be reported to:

- The Ethical Line of ADL or of each company and/or the ethical line of AVAL at the website of Grupo AVAL <https://www.grupoaval.com/wps/portal/grupo-aval/aval/acerca-nosotros/linea-etica>
- The channel of complaints for Transnational Bribery is also available at the following link https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-deDenuncias-Soborno-Internacional.aspx.
- Channel of complaints for Corruption acts available at the following link: <http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion>.

6.2.1. PUBLIC AND/OR POLITICAL CONTRIBUTIONS

In no case the Antifraud, Antibribery and Anticorruption Policy intends to establish a prohibition for Companies regarding the possibility of performing public or political contributions. In this respect, it is clarified that the Companies may perform public or political contributions subject to the provisions of their respective social statutes and of the applicable regulations. In any case, when a public or political contribution is performed, the person in charge must be informed of the Antifraud, Antibribery and Anticorruption Program, for it to evaluate the applicable actions in the light of the current normativity.

ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

6.2.2. DONATIONS AND SPONSORSHIPS

In the event the Companies make donations and/or sponsorships, in compliance with the local and international normativity as of the antifraud and anticorruption matter, they forbid to make or give any type of donation to a national or foreign official, with the intention of influencing any act or omission, with a corrupt purpose of helping the Companies to obtain an improper advantage. The Companies ensure, via their processes, that any type of donation is made under the highest standards of transparency and for the benefit of the society, and they are framed within a plan or program approved by the Presidency and the Board of Directors of the Companies. It is allowed for the Companies to make donations provided that they are made following the procedures defined in the internal document.

6.3. PREVENTION OF FRAUDULENT REPORTS

6.3.1. ACCOUNTING RECORD

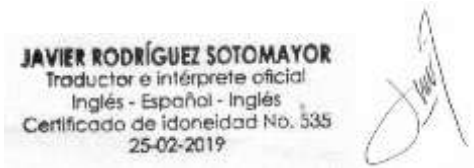
The Companies record in their accounting books all the transactions derived from the business as of the International Accounting Standards that are applicable thereto. All the accounting transactions incurred in with a third party, those derived from sponsorships, facilitation payments and donations must be recorded in detail, so that they are easily identifiable. The Companies have the measures of “internal control on the financial report process” that allow to provide a reasonable assurance on the reliability of financial reports and the preparation of financial statements for external purposes. Among the actions that allow to achieve such assurance, there are:

- To generate matrixes of risk and control.
- To diagnose the status of controls, which implies to assess their design and operational effectiveness, through the practice of independent auditing practices.
- To determine the action and remedy plans for all the identified findings. All the Companies Collaborators must disclose to their superiors or government entities, as the case may be, any violation or potential violation of this policy and, in general, of the antifraud, antibribery and anticorruption regulations, which they may become aware of.

7. GUIDELINES ON CORRUPTION

7.1. CONFLICT OF INTERESTS

The Companies have a Conflict of Interests Guideline designed to protect the company interests, assist the Administration, the Control Bodies and its Collaborators,



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

in order to accomplish high ethical and trust levels and to prevent that they face situations of Conflict of Interests or, in the event of being in them, that they are duly handled.

This guideline incorporates those circumstances where the interests of a collaborator and those of the Companies may oppose each other, and the principles and values that must lead the acting of Collaborators and relatives up to the second degree of kinship, fourth of affinity, first civil, or that the third party has a relationship with the parties interested in the matter, to avoid that a Conflict of Interests arises.

All the Collaborators, suppliers, customers, contractors or other third parties, at the moment of the association and/or commencement of the contractual and/or commercial relationship, must make the Conflict of Interests statement as of the designed form designed and made available by the Companies.

Situations that involve a Conflict of Interests may not always be obvious or easy to solve. This is why collaborators, suppliers, customers, contractors, Control Bodies and third parties of the Companies must inform those situations that have a Conflict of Interests as soon as they are detected and, before making any decision, to the immediate superior and to the Risks Area through form TRV-GIR03-FR-05 Declaración Conflicto de Interés for internal counterparties and TRV-GIR03-FR-07 Declaración Conflicto de Interés - Externos for external counterparties.

Once it is reported, the Risks Area headed by the main and/or alternate Compliance Officer manages and monitors the situations of Conflict of Interest informed to them, as well as guaranteeing the confidentiality and security of the information and determining the corrective, preventive or disciplinary actions applicable to each case.

7.2. BRIBERIES

In compliance with the antifraud, antibribery and anticorruption normativity, the companies forbid their collaborators from the payment, promise of payment or authorization of payment in cash, money or anything of value to a public or private officer or server, national or foreign and, in general, to any person, where the purpose thereof consists in influencing in a corrupt way any act or omission to help ADL or its Subordinate Entities to obtain an improper advantage.

The activities defined for the compliance with this policy include, among other, the following:

- To identify areas and processes in which there is a greater risk.
- To identify third parties that have any relationship with the State.
- To identify and analyze the type of transactions the third party offers or receives.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process	Subprocess	
	Integral Risks Management	ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

- To determine the warning signs
- To define the procedures necessary to prevent, detect and correct.

7.3. PAYMENTS TO SPEED UP PROCESSES AND PROCEDURES

The Companies forbid their collaborators to give or receive payments in order to speed up processes and procedures undertaken before a third party, or in favor of a third party. In order to meet this policy the following activities must, as a minimum, be performed.

- To identify the areas prone to this risk, such as: Commercial Management (customers), Purchases (Suppliers) and Hiring (collaborators).
- To document risks matrixes.
- To periodically monitor such activities.
- To report the results to the Risks Area.
- To perform detection and corrective tests.
- The payments must meet the criteria described in this policy, and for no reason must be made or approved by collaborators of the companies that do not have the approval role defined from the Presidency.

8. RESPONSES BEFORE FRAUD, CORRUPTION AND BRIBERY

8.1. REPORT OF EVENTS

With the purpose of incentivizing the report of events or potential situations related to frauds, malpractices, corruption,, bribery, assets laundering and any other irregular situation, the Companies have made available for the collaborators, suppliers and/or interested third parties the following report mechanisms:

- **Ethical Line of the Companies** through e-mail lineaeticaadl@avaldigitallab.com and/or [Ethical Line](#)
- **AVAL Ethical Line** at the website of grupo AVAL <https://www.grupoaval.com/wps/portal/grupo-aval/aval/acerca-nosotros/linea-etica>.
- The channel of complaints for Transnational Bribery is also available at the following link https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-deDenuncias-Soborno-Internacional.aspx.
- Channel of complaints for Corruption acts available at the following link: <http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion>

Among the complaints that can be filed at these lines there are: improper use and misappropriation of the entity assets, willful acts against the ethics and conduct values and principles, violation of standards, policies or procedures of the entity, not reliable financial information, improper disclosure acts of privileged or restricted information, and other acts deemed as against the standards.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

Note: The Ethical Lines have a reserved and anonymous nature, in no case the whistleblower’s identity shall be disclosed:

8.2 CONDUCTS THAT MUST BE REPORTED

Hereunder, per type of fraud, some actions are included that may constitute fraud, bribery and/or corruption in the Companies and that therefore must be reported. It is clarified that this list is not strict and does not limit the existence of any other fraudulent, corrupt or dishonest conduct, or against the Company interests:

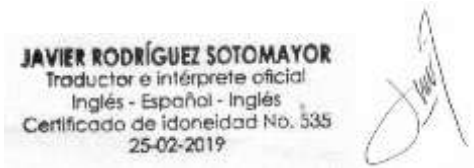
8.2.1. CORRUPTION

To promise, offer or award, directly or indirectly, to a third party an improper benefit that result in its personal gain, of other person’s or of the Companies or its subordinate entities:

- To request or accept, directly or indirectly, to or from a third party an improper benefit that results in its personal gain, of other person’s or of the Companies or its subordinate entities.
- To pay a bribe to a third party (private or public) to obtain an illicit advantage over the competitors.
- To make contributions, in money or kind, to a political cause with the purpose of obtaining an illegal advantage.
- To divert money that have a social or sponsorship purpose for a personal benefit, or with the purpose of committing an act of corruption.
- To illicitly alter a contractual proceeding in a public or private bidding process.
- To favor, in the exercise of its functions, interests of its own or of a third party over the interests of the Companies or of the Subordinate Entities.

8.2.2. ACCOUNTING FRAUD

- To improperly alter or manipulate the incomes and/or expenses accounts, to reflect a performance that does not correspond with reality.
- To perform accounting records in improper periods, in order to reflect a financial situation that does not correspond to reality.
- To improperly assess the assets of ADL or its companies, to reflect a financial situation that does not correspond to reality.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

- To improperly disclose information in the financial statements, that may induce wrong decisions by potential investors, creditors or any other user of the financial statements.
- To make or omit adjustments in the accounting records, for a personal benefit or of third parties.
- To intentionally conceal accounting errors.

8.2.3. ASSETS EMBEZZLEMENT

- To take money or assets in an improper way or without authorization.
- To divert funds from an ADL account or its companies for a personal benefit or of a third party.
- To obtain money from ADL or its companies through fictitious expenses statements.
- To improperly use the petty cash funds.
- To obtain a benefit, assistance or contribution through deceit, or fully or partially silencing the truth.
- To forge or alter any type of document or record, in order to obtain a personal benefit or of a third party.
- To buy, with resources of ADL or of its subordinate Entities, goods or services for the personal use or of a third party.
- To subtract or abusively use the ADL assets or of its Subordinate Entities for a personal benefit or of a third party, such as goods, equipment, furniture, inventories, investments, among others.
- To perform double payments, not authorized, or to incur in expenses not supported with formal documents.
- Improper manipulation of treasury surpluses, for a personal benefit or of a third party.
- Improper management or use of the ADL information assets or of its Subordinate Entities. for a personal benefit or of a third party. The following, but not limited to the existence of others, are included:
 - Digital information assets: information kept or transmitted by TI (Technology of Information) elements.
 - Information assets in other physical and/or electronic means: information kept in other means different from digital.
 - TI elements: work stations, operational systems, mobile devices, printers, software, information systems, storage means, servers, networks, e-mail, among others.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

8.2.4. INFRINGEMENT OF INTELLECTUAL PROPERTY

- To obtain, by any means, a commercial secret without the authorization of ADL or of its Subordinate Entities or of its authorized user.
- To improperly sell, offer, disclose or use the commercial and business secrets of ADL or of its Subordinate Entities, including information of its own, confidential or other intellectual property.
- To alter, erase or disable computer or software programs.
- To copy, reproduce or distribute computer or software programs without authorization.
- To destroy, erase, disable or improperly use the computing records of ADL or of its Subordinate Entities.

9. INVESTIGATION PROCESS

The investigation mechanisms are intended to undertake the necessary actions to clarify the potential events of fraud, bribery and/or corruption. ADL and its Subordinate Entities are committed to investigate in an objective and comprehensive way all the events of fraud and corruption reported through the different exposed mechanisms.

The investigation process is the responsibility of the area appointed by the presidency, as applicable, and can be performed jointly with an independent third party or by whoever is internally appointed, when so is decided as of the criticality, circumstances or involved staff, among other aspects. This decision is made by the Ethics and Conduct Committee depending of the particular circumstances for each case.

Investigations are confidential until as a result thereof their disclosure, report and treatment are determined as of the applicable internal and/or external instances. Collaborators that make part of the investigation process are obliged to keep the information totally confidential. The investigation process may require, among others, the following activities, provided that they are not in contravention of the legal provisions of each country.

- Interviews with collaborators or external people.
- Collection and analysis of documentation or evidence.
- Forensic examination.
- Review of phone calls.
- Inquiry with financial institutions.
- Access to physical and magnetic files.
- Inspection of funds, goods or assets.
- Inquiry or interviews with policy entities or regulation entities or entities of monitoring and control.



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

- The results of investigations are informed to the Management of Compliance and other areas, as applicable.
- To warrant the independence and opportunity of the team that performs the investigation.
- Demand of the nature of confidentiality of the investigation, as well as the results thereof.

The evidence obtained as a result of the investigation process is kept as a support thereof and of the actions to be taken as a product of the decisions that for such effect are set by the Ethics and Conduct Committee. The Ethics and Conduct Committee determines the disciplinary sanctions applicable to the Collaborator or Collaborators that commit fraud or act against the provisions of this Policy and its related policies. Sanctions are determined as of the investigation results. The enforcement of sanctions is made as of the procedures set in the Internal Work Regulations and/or Normativity in force, the above notwithstanding the legal and civil actions that may apply. Refer to the sanctions numeral, as applicable, where necessary, inform the competent authorities on any event of fraud or corruption and undertake and accompany the applicable judicial actions.

9.1. CONSEQUENCES OF BREACHES

Notwithstanding the civil and criminal remedies that may apply as of the applicable regulation and the laws relating to Antibribery and Anticorruption matters, the total or partial breach of this Policy by any counterparty related to the company shall result in the enforcement of sanctions, which may include the unilateral termination of the commercial or work contract with just cause. This is why any finding in the light of conducts associated with fraud, bribery or corruption shall be investigated and managed by the Ethics and Conduct Committee, to determine the actions or sanctions to be enforced.

10. AWARENESS AND TRAINING

The Compliance Officer must design and implement once (1) a year, a communication and training program, for the different groups of interest as of the risk level determined by the Companies, to emphasize on the current regulation and the different compliance policies contained in this program, in order to enhance the culture, to raise awareness regarding the prevention of risks of fraud, corruption, national and transnational bribery, which must meet the following characteristics:

- Training and annual disclosure about the ABAC program.
- Coordination with the Human Talent area for the training and participation call for all direct and indirect employees of the companies.

ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

- To convey information for the new employees, with a direct or indirect association, may it be through an in-person or virtual modality.
- Evaluation of the training efficiency.
- Awareness for all the staff or critical groups, through documents and periodic publications, with matters relating to fraud, corruption, national and transnational bribery, and their administration.
- To place on record the trainings as well as the conveyed induction process, such support must be duly documented in the custody of Human Talent.

11. UPDATING AND DISCLOSURE OF THE POLICY

This Policy shall be reviewed at least every two (2) years or every time new regulations or a modification of the established processes are identified, or every time changes are present in the company activity that may alter the level of exposure to C/ST risk.

The dissemination and updating of this policy will be the responsibility of the Compliance Department, in coordination with the Compliance Officer or his representative. The approval of the provisions of this Policy, Manual, and any updates is the responsibility of the Board of Directors.

12. INTERNAL AUDIT

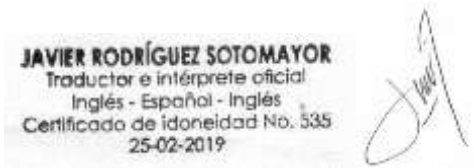
The Internal Audit shall perform an evaluation of the Antifraud, Antibribery and Anticorruption Policy, based on risks, the effectiveness of controls and the treatment of the cases reported for fraud, corruption and bribery, when it considers relevant, as of its work plan.

13. PRESERVATION OF INFORMATION

The ABAC policy must have a proper procedure of filing and preservation, that allows to support the program elements, as of the documentary management policy that guarantees the availability, opportunity and reliability of the information.

14. TYPE OF INFORMATION

Public	Internal	Confidential
X		



ADL logo (carroya.com, facilpass, metrocuadrado, Seguros ADL logos)	COUNTERPARTIES GUIDELINES ANTIFRAUD, ANTIBRIBERY AND ANTICORRUPTION POLICY (ADL AND ECOSISTEMAS)		
	Process Integral Risks Management	Subprocess ABAC	
	Code: TRV-GIR03-OD-03	Version: 02	Date: 05/26/2025

15. ENFORCEABILITY

Companies	Transversal
	X

16. CHANGES CONTROL

Version	Approval Date	Description
01	01/12/2024	Initial Version
02	05/26/2025	General update of the ABAC Policies

