

Name of the Policy	CORONA'S TRANSPARENCY AND BUSINESS ETHICS PROGRAM	Code	Version
		GRC-PC-83	5
Responsible	BOARD OF DIRECTORS	In force as of	
Type of Document	POLICY	June, 2023	

I. OBJECTIVE AND SCOPE

Establish the Transparency and Business Ethics Program ("PTEE") of Corona Industrial S.A.S. and all its Colombian affiliates and subsidiaries that do not have their own PTEE ("Corona").

This PTEE defines the policies, guidelines, standards of conduct and control **mechanisms** to prevent acts of Corruption, Bribery and Transnational Bribery that impact or may impact Corona's local, regional, national and international operations.

Corona will adopt and implement this PTEE even when **if** not required by law. Likewise, foreign subsidiaries and affiliates of Corona to which this PTEE is not applicable because they are not domiciled in Colombia may consider the compliance policies set forth in this document as good practice, without prejudice to **compliance** with the regulations applicable to each of them.

This PTEE is applicable to all Corona's counterparties and repeals and **fully** replaces the Corruption, Bribery and Transnational Bribery Risk Management Manual implemented by Corona **on** April 1, 2017.

II. DEFINITIONS

Terms with initial capital letters or **in** capital letters shall have the meaning **set forth** in the Glossary or indicated in this Policy. In the event of contradiction between the definitions set forth in the Glossary and those set forth in the Regulatory Framework, the definitions set forth in the Regulatory Framework shall prevail.

III. REGULATORY FRAMEWORK

Corona shall comply with Chapter XIII of the Basic Legal Official Letter (*Circular Básica Jurídica*) of the Superintendence of Companies and the applicable Colombian regulation on and for the prevention of the risks of Corruption, Bribery and Transnational Bribery (the "C/S/ST Risks"), as well as those that modify, add or complement thereof.

IV. SURVEILLANCE AUTHORITIES

Pursuant to the regulations in force **on** the date of this Policy, the Superintendence of Companies is the competent authority to supervise compliance with this PTEE.

V. ELEMENTS OF THE PTEE

5.1. Design and Approval

As part of its Corporate Governance System, Corona has established a program that contemplates, among others, the control and management of risks related to Corruption, Bribery and Transnational Bribery (the

"Compliance Program").

The Compliance Program administers and manages risks related to compliance with laws, internal legal compliance policies and best practices applicable to the activities of Corona's businesses, in order to mitigate legal, reputational, operational, financial and other risks, including those related to Corruption, Bribery and Transnational Bribery.

This PTEE has been designed as a fundamental part of Corona's Compliance Program and in accordance with the provisions of the Regulatory Framework. For this purpose, an exhaustive evaluation has been made of the characteristics of each of the companies that integrate Corona and the Corruption, Bribery and Transnational Bribery Risks to which they are exposed and which they must mitigate.

The PTEE has been approved by the Board of Directors of Corona Industrial S.A.S. and those companies that have a **Board of Directors**. For companies that do not have a Board of Directors, the PTEE has been approved by the corresponding General Shareholders' Meeting.

5.2. PTEE Compliance Audit

The Board of Directors or, in the absence thereof, the General Shareholders' Meeting of each of Corona's companies shall designate a Compliance Officer **pursuant to** the minimum requirements for the position set forth in the Regulatory Framework. The same person may exercise this role for all of Corona's companies, always in compliance with the limitations established in the applicable Colombian regulations. Each time this person is appointed **in a company**, the company shall inform the Superintendence of Companies within 15 **business** days as required by the entity or the applicable Colombian regulations.

5.3. Disclosure and Training

Corona will publish the PTEE on the Corporate Policies website and on the corporate website for enquire by all its counterparties.

The Compliance Officer shall identify Corona's employees with positions sensitive to the materialization of risks of Corruption, Bribery and Transnational Bribery, as well as Contractors who should be aware of the PTEE. At least once a year, Corona shall provide training to such employees and Contractors.

The Vice-Presidency of Corporate Affairs will establish a Communications and Training Plan to raise awareness of the PTEE among employees, contractors and counterparties who should be aware of it. This Plan will be reviewed and updated according to the needs and characteristics of Corona's business.

5.4. Communication and Complaint Channels

Corona has established the e-mail lineaeticayanticorrupción@corona.com.co as a free-access channel to the public that allows its counterparties to report, in a confidential and anonymous manner, any possible irregularity in the compliance with the PTEE, as well as any possible conduct of Corruption, Bribery and Transnational Bribery, among others. The Vice-Presidency of Integral Human Resources Management may implement other communication or reporting channels, as well as modify the existing one. Any complaint is subject to the Non-Retaliation Policy established in this PTEE.

In addition, pursuant to Chapter 5.4. of the Code of Ethics, employees may report concerns regarding possible breaches of the PTEE and any corrupt practices to the Compliance Officer, their Immediate Supervisors, their Natural Group, the Integral Human Resources Managers or the Vice Presidents of each business division, business unit or cross-section function. Contractors and third parties may also write to lineaeticayanticorrupción@corona.com.co.

Finally, Corona in its firm commitment to prevent Corruption, Bribery and Transnational Bribery urges its

counterparties to make use of the following reporting channels provided by the Superintendence of Companies and the office of the President of the Republic of Colombia, to report any act of Corruption, Bribery or Transnational Bribery of which they become aware:

a. Transnational Bribery Whistleblower Channel:

https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-de-Denuncias-Soborno-Internacional.aspx

b. Corruption Reporting Channel:

<http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion>

5.5. Administrators and their duties

The following are the officers responsible and their functions in connection with the compliance with the PTEE:

a. Board of Directors or Highest Corporate Body

- Promote a culture of "zero tolerance" with acts of Corruption, Bribery and Transnational Bribery inside and outside Corona;
- Define and issue the policies that may be necessary to strengthen the prevention and control of the risks of Corruption, Bribery and Transnational Bribery, which shall be part of this PTEE;
- Define the profile and appoint the Compliance Officer, who must meet at least the requirements of the Regulatory Framework;
- Approve the document that contemplates the PTEE and its amendments;
- Assume a commitment aimed at preventing C/S/ST Risks, so that Corona can conduct its business in an ethical, transparent and honest manner;
- Ensure the provision of economic, human and technological resources that are relevant and reasonably required by the Compliance Officer for the fulfillment of his/her work;
- Order the pertinent actions against Collaborators, Administrators and Associates who have management and administration functions in Corona when any of the above violates the provisions of the PTEE;
- Lead an adequate communication and pedagogy strategy to ensure effective disclosure and knowledge of the Compliance Policies and the PTEE to Employees, Associates, Contractors (according to the Risk Factors and Risk Matrix) and other identified parties.

b. Vice Presidents and Managers of Business Divisions, Cross-Section Functions and Business Units

- Demonstrate leadership, diligence and commitment with compliance with the provisions of the Code of Ethics and the PTEE;
- Promote a culture of "zero tolerance" for acts of Corruption, Bribery and Transnational Bribery within and outside Corona.

c. Legal Representatives

- Submit the proposed PTEE with the Compliance Officer for approval by the Board of Directors or the highest corporate body,;

- Ensure that the PTEE is articulated with the Compliance Policies adopted by the Board of Directors or the highest corporate body;
- Provide effective, efficient and timely support to the Compliance Officer in the design, management, supervision and monitoring of the PTEE;
- In cases where there is no board of directors, the legal representative shall propose to the highest corporate body the candidate for the position of Compliance Officer;
- Certify before the Superintendence of Companies compliance with the provisions of this Chapter, when required by such Superintendence;
- Ensure that the activities resulting from the development of the PTEE are duly documented, so that the information meets the criteria of integrity, reliability, availability, compliance, effectiveness, efficiency and confidentiality. The documentary supports must be kept in accordance with the provisions of Article 28 of Law 962 issued in 2005, or the rule that modifies or replaces it;
- Ensure compliance and enforcement of all policies related to the PTEE;
- Ensure that no one within Corona that makes Internal Reports on facts that could be deemed acts of Corruption, Bribery or Transnational Bribery or acts that violate Corona's policies, suffers any retaliation or discrimination;
- Request in a timely manner to the Board of Directors or whoever corresponds according to the law and the bylaws, the physical, technological, system and human resources that are pertinent and reasonably required for the Compliance Officer to be able to perform his/her work and fulfill his/her duties in an independent and autonomous manner. The Legal Representative shall request the required authorizations from the Board of Directors or whomever may correspond according to the law and the bylaws.

d. Compliance Officer

- Qualifications for the position:

The Compliance Officer shall comply with the requirements established in the Regulatory Framework and those defined by the Board of Directors.

- Duties and Functions of the Compliance Officer:

- Submit with the legal representative, for approval by the board of directors or the highest corporate body, the proposed PTEE as well as any amendments and adjustments thereto;
- Submit, at least once a year, reports on the management and compliance with the PTEE to the board of directors or to the highest corporate body. The reports must contain, at least, an evaluation and analysis of the efficiency and effectiveness of the PTEE and, if applicable, proposals for improvements. Likewise, it should demonstrate the results of the Compliance Officer's management and Corona's management, in the compliance with the PTEE;
- Ensure that the PTEE is in line with the Compliance Policies adopted by the Board of Directors or the highest corporate body;
- Ensure effective, efficient and timely compliance with the PTEE;
- Implement a Risk Matrix and update it according to Corona's own needs, its Risk Factors, the material nature of the C/S/ST Risks and according to the Compliance Policy;

- Define, adopt and monitor actions and tools for the detection of C/S/ST Risks, pursuant to the Compliance Policy for the prevention of C/S/ST Risks, and the Risk Matrix;
- Ensure the implementation of appropriate channels to allow any person to report, confidentially and securely, any breach to the PTEE and possible suspicious activities related to Corruption, Bribery and Transnational Bribery;
- Verify the proper application of the non-retaliation and whistleblower protection policy implemented by Corona and, with respect to employees, the workplace harassment prevention policy pursuant to the law;
- Establish internal investigation procedures in Corona to detect any breach to the PTEE, acts of Corruption, Bribery and Transnational Bribery;
- Coordinate the training development on the PTEE;
- Verify compliance with Due Diligence procedures applicable to Corona;
- Ensure proper archiving of documentary supports and other information related to the management and prevention of C/S/ST Risks;
- Design the methodologies for classification, identification, measurement and control of C/S/ST Risks that will be part of the PTEE;
- Evaluate compliance with the PTEE and the C/S/ST Risks to which Corona is exposed;
- Implement and develop processes through which the policies approved for the implementation of the PTEE shall be put into practice;
- Advise and guide people within Corona in C/S/ST Risk Management;
- Identify situations that may generate C/S/ST Risks in Corona's operations;
- Implement and develop controls to situations that may generate risks in the operations, businesses or contracts performed by Corona;
- Follow up or monitor the efficiency of the policies, procedures and controls established in this PTEE;
- Receive and assess internal reports of potential Acts of Corruption, Bribery or Transnational Bribery;
- Delegate to other Administrators, when authorized by Senior Management, the administration of the Transnational Bribery Risk Management System in those subordinate companies that are part of Corona and are domiciled abroad;
- Order the initiation of internal investigation procedures upon suspicion that a violation of the laws concerning Corruption, Bribery and Transnational Bribery has been committed;
- Inform the Directors of any breaches to this PTEE by any employee;
- In order to ensure the continuous improvement of the PTEE, the Compliance Officer will form a transparency and ethics committee integrated by Employees belonging to the Vice-Presidency of Integral Human Resources and the Legal and Corporate Affairs Management. This committee shall meet at least every two months.

e. Internal Auditor

- Conduct periodic activities to assess the risks of Corruption, Bribery and Transnational Bribery;
- Conduct annual compliance and effectiveness audits of the PTEE.

f. Collaborators, Administrators and Associates

Every Corona Employee, Administrator and Associate has the obligation to comply with this Policy, for which they must comply with the following activities:

- Observe the principles, values and standards of conduct established by Corona;
- Assume at all times a transparent attitude towards other counterparties;
- Behave in accordance with the law in performing their duties;
- Reject and not encourage acts of Corruption, Bribery or Transnational Bribery of any kind with every counterparty with which they interact;
- Behave ethically and transparently in the management of Corona's human, financial and technological resources;
- Comply with Corona's internal regulations established for contracting and for the acquisition of goods and services;
- Inform the Compliance Officer, or through the different reporting channels, when becoming aware of acts of Corruption, Bribery or Transnational Bribery.
- Attend the training activities for which they are selected.

g. Suppliers, Contractors, Customers and Third Parties

Corona shall make the PTEE known to its Suppliers, Contractors, Customers and other third parties, who shall comply with the provisions herein as applicable thereto. Those Suppliers and Contractors that are identified by the Compliance Officer as being subject to training on the PTEE must attend the training sessions, as appropriate.

h. Audit

- Pay special attention to alerts that may give rise to suspicion of an act related to a possible act of Corruption, Bribery or Transnational Bribery;
- Verify the effectiveness of this PTEE through the consistency of accounting records.

VI.COMPLIANCE POLICIES

1. POLICY FOR THE PREVENTION OF ACTS OF CORRUPTION, BRIBERY AND TRANSNATIONAL BRIBERY AND ZERO TOLERANCE WITH CORRUPTION, BRIBERY AND TRANSNATIONAL BRIBERY.

Corona is committed to the prevention of any act of Corruption, Bribery and Transnational Bribery and therefore all operations must conform to the highest ethical standards and legality. Facilitation payments to obtain advantages, influence a decision or accelerate a procedure are not allowed, even when the decision represents a legitimate interest or right of Corona.

With the adoption and disclosure of the PTEE, Corona and its Administrators declare and express to all its counterparties that they do not tolerate or admit any type of act, transaction or business link carried out through acts of Corruption, Bribery or Transnational Bribery.

2. POLICY FOR THE COLLABORATION WITH THE STATE.

Corona will cooperate effectively with the Governmental Authorities in their investigations regarding acts of Corruption, Bribery, Transnational Bribery and, in general, any illegal act.

All procedures carried out by Corona before Governmental Authorities must strictly adhere to all applicable procedures and legal provisions.

3. POLICY FOR RELATIONS WITH PUBLIC OFFICERS.

In accordance with the principles and standards defined in our Code of Ethics (Chapter 3.4. Relations with government authorities) and in this PTEE, any person acting on behalf of Corona that meets for any reason with a public officer of any branch or level must comply with the following guidelines:

- Inform its immediate supervisor of the need of the meeting, if planned, or the need for holding the meeting if it arose in a way that he/she could not inform in advance;
- Attend to such meeting, to the extent possible, with another employee of Corona;
 - If a third party (in particular lawyers or external advisors of any specialty) is to attend the meeting with a public officer on behalf of Corona, the Corona employee responsible for the matter must ensure that the third party is aware of and accepts Corona's code of ethics and this PTEE.
- The meeting must be held, to the extent possible, in public offices, official events, events convened by third parties or in the facilities of associations of which Corona is a member, and during business hours. If it is not possible to hold the meeting in such places, it shall be held in places with free access to the public;
- The consumption of liquor and psychoactive substances is prohibited;
- In all interactions with public officers, appropriate use of language must be maintained to avoid messages that may imply that prohibited offers are being made or that may be perceived as contrary to the law.
- Written communications with Public Officers should be done by suitable means, such as corporate e-mail or letters of transmittal. It is good practice to refrain from communicating via instant messaging (chat).
- The meeting should be suspended if there is a deviation of its purpose towards particular interests of the officer(s) and/or third parties, and the employee shall report the incident to its immediate supervisor and to the Compliance Officer for the prevention of Corruption, Bribery and Transnational Bribery.
- The Compliance Officer must be informed of any irregularity that he/she may perceive in the relationship with any public officer.
- The immediate supervisor must be informed of the issues discussed during the meeting within two (2) days after the meeting is held using the format defined by the Compliance Officer.

4. NON-RETALIATION AND WHISTLE-BLOWER PROTECTION POLICY.

In no case shall Corona retaliate or discriminate against anyone for reporting potential acts of Corruption, Bribery or Transnational Bribery. Corona will not tolerate that others involved do so. The integral Human Resources Vice-Presidency will establish the guidelines to be followed to protect whistle-blowers and the Ethics Committee of the respective division, unit or cross-section function will take the measures warranted in each specific case.

5. POLICY ON HANDLING PAYMENTS AND ACCOUNTING RECORDS.

Corona has different internal policies that define the guidelines for the expenses and investments to be made under reasonable limits according to levels of attribution, segregation of functions, documentary support, which contribute to the prevention of C/S/ST Risks; for example: Authorities of Representation and Authorization (Attributions, Policy of Assignment, Administration and Use of Corporate Credit Cards, Assignment and Use of Mobile Phones, Transportation, Purchasing and Payments Manual, which are listed in the Chapter of Annexes of this Manual.

Corona shall, among others, consider the following :

- The request and approval of payments must be handled by different persons, ensuring segregation of duties;
- All financial transactions must be identified in detail and recorded properly and clearly in the accounting books;
- The accounting books must be available for inspection by the Legal Representative, the Board of Directors, the General Shareholders' Meeting, the internal auditors, the Auditor and the Governmental Control Bodies, as applicable;
- Employees and third parties may not make or authorize payments without the corresponding documents, invoices and/or receipts that fully and accurately describe the type, purpose of the payment and the beneficiary thereof.
- Accounting records and pertinent documents must be maintained for the term defined by law;
- All legal provisions and all local tax regulations must be complied with.

6. POLICY REGARDING CASH AND PETTY CASH MANAGEMENT.

- With respect to handling cash and petty cash, Corona shall always keep detailed accounting records of the handling, destination and use of petty cash resources, in accordance with the definitions of the Petty Cash Policy FIN-PC-45, related in the Chapter of Annexes of this PTEE.
- Corona shall take appropriate control measures with respect to cash payments received or reimbursed to its customers.
- Payments to suppliers, other than petty cash, shall be made solely through the financial system and directly to the person who provided the supply or service.

7. COUNTERPARTY POLICY.

Corona shall, with respect to all its counterparties and to the extent legally possible:

- Inform them of the policies related to this PTEE and inform them that all activities carried out on Corona's behalf must comply with it;
- Not use them as a conduit to commit any act of Corruption, Bribery or Transnational Bribery;
- Engage them only to the extent necessary for the normal conduct of Corona's business;
- Not make facilitation payments to Public Officers, both in Colombia and abroad.
- As part of the PTEE, the Legal and Corporate Affairs Management will establish the clauses that must be included in the forms and contracts to be signed by the counterparties, in order to: (i)

carry out the Due Diligence processes; and (ii) take actions in relation to the initiation or continuity of contractual relationships in accordance with the guidelines defined by the Vice-Presidency of Corporate Affairs;

- Take all necessary measures and undertake a Due Diligence, to know the potential counterparties before performing or establishing any type of operation or business, contractual or legal relationship of any order or nature.

8. REMUNERATION POLICY AND PAYMENT OF COMMISSIONS TO EMPLOYEES.

Corona will compensate its employees pursuant to the Compensation Policies defined by the Vice-Presidency of Integral Human Resources, as well as any policy related to compensation and benefits approved by the Board of Directors or the highest corporate body. The vice-presidencies of each business division or commercial unit will previously establish written policies for the payment of commissions to its employees in accordance with the conditions of each specific market and in coordination with the Vice-President of Integral Human Resources. Corona will not pay any commission to employees, if it is not provided for in such policies, unless approved by the Board of Directors of Corona Industrial S.A.S.

9. POLICY ON REMUNERATION AND PAYMENT OF COMMISSIONS TO ASSOCIATES.

Associates of Corona's companies shall receive dividends in accordance with the Bylaws and Shareholders' Agreements registered with the companies. Corona shall not pay commissions to Associates other than such dividends, unless approved by the Board of Directors of Corona Industrial S.A.S.

10. POLICY ON COMPENSATION AND PAYMENT OF COMMISSIONS TO CONTRACTORS.

Remunerations and commissions paid by Corona to its Contractors must be limited to recognizing and encouraging good business performance, and in no case shall they be understood or used to conceal facilitation payments or payments that constitute acts of Corruption, Bribery or Transnational Bribery. Each business division, business unit or cross-section function will define the payment of remuneration and commissions to contractors according to the specific market conditions. If Corona engages third parties for the provision of services related to actions before Government Authorities, the payment must be agreed in advance according to market conditions and authorized in writing by the Vice-President of the respective business division, business unit or cross-section function.

11. POLICY REGARDING LOBBYING ACTIVITIES.

- Corona agrees to carry out lobbying activities for matters of public interest, public policy and/or through associations that have a high impact on the development of its operations;
- Lobbying must be carried out on the basis of the values of Transparency, Honesty, Integrity and strict respect for the Law;
- Lobbying must not be used for corrupt or illegal purposes, nor to improperly influence any decision that represents an advantage for Corona. Facilitation payments to Public Officers or Governmental Authorities to expedite changes in public and governmental affairs are prohibited;
- Any lobbying relationship must be conducted under the following parameters:
 - It is not allowed to make any type of payment to Public Officers;
 - If services are engaged for this purpose, the engaged persons or entities must have proven experience and a high level of reputation;

- The collaborator authorized to make these approaches to external parties must be familiar with the guidelines established in this PTEE and shall sign a commitment to comply with such guidelines.

12. POLICY REGARDING GIVING, OFFERING OR ACCEPTING GIFTS OR BENEFITS.

In development of Chapters 3 and 4 of the Code of Ethics, this PTEE includes the following clarifications related to the offer and acceptance of gifts and benefits:

- It is forbidden to give, offer or promise any type of gifts or benefits to local or foreign public officers and/or their relatives, as well as to any third party, with the purpose of obtaining an illegitimate or illegal benefit. No gifts or benefits shall be received from any person, except as established in this PTEE;
- No gifts or benefits may be given to or received from third parties related to Corona, whether they are suppliers, customers, or aspiring customers, except in the case of promotional items such as diaries, pens, notebooks, calendars, mugs, caps or other merchandising items;
- In the case of an offer of travel, airline tickets or any other type of goods or hospitality services, whatever the purpose, as well as when gifts other than those authorized in the previous point are received, they must be refused or returned indicating that Corona's policy does not authorize to accept them. If for cultural reasons it is not possible to refuse or return them, the Human Resources Manager of the business division, business unit or cross-section function must be informed, so that he/she can guide on how to proceed according to the guidelines established by the Vice-Presidency of Integral Human Resources and a record of the final destination of these gifts must be kept. In case of doubt, the Ethics Committee of the corresponding business may be contacted.

The above provisions related to giving, offering or promising are applicable regardless of whether the employee performs these acts with his/her own resources.

13. EXPENDITURE POLICY RELATING TO ENTERTAINMENT ACTIVITIES.

In line with the previous Policy, it is prohibited to give, offer, promise or receive attentions related to entertainment to a public officer or a third party. When Corona offers entertainment activities to its employees, such activities shall be limited to them and their families.

14. POLICY RELATED TO FOOD, LODGING AND TRAVEL EXPENSES.

Corona will cover expenses related to food, lodging and travel of its managers, employees and contractors pursuant to the Travel Expenses Policy established by the Vice-Presidency of Integral Human Resources and the Vice-Presidency of Finance, Strategy and Services.

Expenses related to food, lodging and travel paid by third parties to employees that are necessary within a contractual relationship should preferably be agreed in advance and in accordance with the specific market conditions.

In any case, the payment of these items may not be used to obtain an undue business advantage or to corruptly and illegitimately influence the way a person acts or makes decisions. On the contrary, these expenses must always be linked to a legitimate business purpose.

15. POLICY REGARDING POLITICAL CONTRIBUTIONS.

Corona does not participate in any way in political activities, nor does it support any political party or

movement in candidacies for public corporations or elected office. Corona recognizes the right of its employees to participate in political affairs on a personal basis, considering the guidelines of the Code of Ethics, ETI-PC-20, listed in the Chapter of Annexes of this PTEE.

16. POLICY REGARDING DONATIONS AND SPONSORSHIPS.

- Corona must take the necessary measures to ensure that its donations and sponsorships are not used as an excuse for the commission of acts of Corruption, Bribery or Transnational Bribery;
- Donations and sponsorships made by Corona must be transparent, be clearly reflected in the accounting books and comply with applicable laws;
- Donations shall only be made to non-profit entities and after having been subject to a Due Diligence, being aware who the recipient of the donation and the final beneficiary thereof are, following the procedure established by Corona in the Donations Policy GAS-PC-27.

17. DUTIES FOR EMPLOYEES EXPOSED TO THE C/S/ST RISK.

Employees who are exposed to the C/S/ST Risk must comply with the following duties:

- Comply with the controls and policies for the prevention and mitigation of C/S/ST Risk established in this PTEE;
- Report to the Compliance Officer when they become aware of a situation, operation or unusual behavior that comes to their attention and may be related to acts of Corruption, Bribery or Transnational Bribery;
- Not accept proposals from third parties for the performance of acts associated with Corruption, Bribery or Transnational Bribery, in the context of Corona's operations and business;
- Attend and/or provide training about the PTEE and its policies, as scheduled by the Compliance Officer;
- Strictly comply with this PTEE, as appropriate.

VII. STAGES OF THE PTEE

7.1. Identification of C/S/ST Risks

Corona has established a C/S/ST Risk Matrix in which Corruption, Bribery and Transnational Bribery Risks and Risk Factors are identified at a global level for all its business divisions, business units and cross-section functions, defining the most appropriate control mechanisms and their application to the identified Risk Factors.

Each of Corona's companies shall adopt a specific risk matrix based on the risks and risk factors identified according to its particular characteristics. For the identification of C/S/ST Risks, each company of Corona will follow the C/S/ST Risk Management Methodology.

The performance of this methodology will include a thorough evaluation of the particular characteristics of each company of Corona based on procedures proportional to the material nature, size, structure, countries of operation and specific activities of each of the companies of Corona.

7.2. C/S/ST Identification of Risk Factors

Among others, each company of Corona will consider the following risk factors:

- Country
- Economic Sector
- Third Parties
- Others

7.3. C/S/ST Risk measurement or assessment

Each of the companies of Corona shall measure or evaluate its C/S/ST Risks on a regular, informed and documented basis. The measurement or evaluation of the risk of Corruption, Bribery or Transnational Bribery shall be carried out in accordance with the provisions of the Methodology for the Management of C/S/ST Risks.

In any case, when Corona or any of its companies enters a new market or offers new products or services, it shall identify the C/S/ST risks that these situations may generate and shall proceed to their evaluation in accordance with the aforementioned methodology.

7.4. Control and Monitoring of Compliance and PTEE Policies

The purpose of the control and monitoring stage is to define the measures to be implemented to prevent and mitigate the risk inherent in the situations to which Corona is exposed. The control and monitoring applied to Corona's internal processes shall seek to reduce the possibility of occurrence or the impact of the risk situation should it materialize.

Control and monitoring activities shall be carried out in accordance with the provisions of the C/S/ST Risk Management Methodology.

VIII. DUE DILIGENCE PROCEDURES

The Due Diligence procedures applicable to the PTEE will be those described in PTEE Due Diligence Procedures Manual. The procedures above are focused on the knowledge of the counterparties and on identifying and evaluating whether the findings with respect to the counterparties may materialize any risk of Corruption, Bribery and Transnational Bribery in the development of Corona's daily activities.

IX. WARNING SIGNS

The Chapter of Annexes of this PTEE lists the Warning Signs that serve as a guide to identify possible situations that could be considered acts of Corruption, Bribery or Transnational Bribery.

IX. ARCHIVING AND DOCUMENT PRESERVATION PROCEDURES

Corona must preserve documents and records relating to compliance with the rules against Corruption, Bribery and Transnational Bribery, as well as with respect to international business or transactions, for a term of ten (10) years. Corona's Vice-Presidency of Finance, Strategy and Services will include this obligation in Corona's Document Management Policies.

X. TRANSLATION

Corona shall maintain versions of the PTEE and the Compliance Policy in the official languages of the countries where it conducts International Business or Transactions, activities through Subsidiaries, branches or other establishments, or even Contractors in other jurisdictions, when the language is not Spanish.

XI. UPDATES AND MODIFICATIONS

This PTEE will be subject to updates and modifications every time there are changes in Corona's activity that alter or may alter the degree of C/S/ST Risk, when there are changes in the applicable regulations that so warrant, and in any case every two (2) years.

XII. SANCTIONING REGIME

Any deliberate non-compliance or omission of the controls established in this PTEE will result in sanctions in accordance with the provisions of the Internal Work Regulations.

XIII. ANNEXES

- Code of Ethics ETI-PC-20
- Methodology for C/S/ST Risk Management
- Document Management Policy GRC-PC-29
- Petty Cash Policy FIN-PC-45
- Donations Policy GAS-PC-27
- Cash Donations Policy GAS-PC-78
- Travel Policy GAS-PC-01
- Information Security Policy GRC-PC-23
- Personal Information Treatment Policy GRC-PC-42
- Assignment, Administration and Use of Corporate Credit Cards Policy GAS-PC-07
- Policy on Authorities of Representation and Authorization (Attributions) GAS-PC-05
- Policy on Assignment and Use of Mobile Phones GAS-PC-24
- Land Transportation Policy GAS-PC-40
- Procurement and Negotiations Manual ICC-MA-12-06
- Investment Project Management and Approval Policy GAS-PC-04
- Corruption and Bribery Warning Signs Guide GRC-GU-01
- PTEE Due Diligence Procedures Manual GRC-MA-83-01

GLOSSARY

For the purposes of this PTEE and the proceedings to which it refers, the following definitions are used, noting that, as far as conduct is concerned, the PTEE is limited to a broad description and does not limit in any way the conduct, offense, infraction or type of criminal offense to which it may refer:

Administrators: In accordance with Colombian law, administrators are the legal representative, the members of the Board of Directors, the liquidator, the factor and those who, **pursuant to** the bylaws, exercise or hold such functions;¹

Senior Management: These are the individuals or companies appointed in accordance with the bylaws or any other internal provision of Corona and Colombian law, as applicable, to manage and direct Corona, whether they are collegiate bodies or individuals individually considered;²

Associates: these are the individuals or companies that have made a contribution in money, work or other assets appreciable in money to a company in exchange for quotas, interest parties, shares or any other form of participation contemplated by Colombian law. For the purposes of this PTEE, they shall be the shareholders and partners;³

Governmental Authority: Any state entity, whether national, departmental or municipal, and any authority, superintendence, administrative department, regional corporation, tribunal or court, central bank, entities exercising executive, legislative or judicial powers or functions, as well as independent organs and entities of the public power;

Conflict of Interest: A situation where activities, affairs, relationships or business, financial, family, personal or political interests of a counterparty interfere or may interfere with decision making in the best interest of Corona;

Counterparties: Persons with whom Corona has business, contractual or legal relationships, including, among others, employees and collaborators, Administrators, Senior Management, Associates, Contractors, customers and public or private suppliers of goods and/or services;

Contractors: These are third parties who provide services to Corona by virtue of a contractual legal relationship of any nature. Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants and persons who are party to collaboration agreements, temporary ventures or consortiums, or risk-sharing agreements with Corona;

Corruption: It is the abuse of positions of power or trust, for private benefit to the detriment of the collective interest, carried out through offering or requesting, delivering or receiving goods or money in kind, in services or benefits, in exchange for actions, decisions or omissions;⁴

Due Diligence: Process that consists in evaluating the nature and magnitude of the risks of Corruption, Bribery or Transnational Bribery that may arise within Corona and acting with the necessary prudence and diligence so that managers can make sufficiently informed decisions related to specific transactions,

¹ Definition taken from "Deberes de los Administradores" - Buen Gobierno Corona

² Definition taken from "Official Letter 100-000003 issued by the Superintendence of Companies"

³ Definition taken from "Official Letter 100-000003 issued by the Superintendence of Companies"

⁴ Definition taken from "Transparencia por Colombia" <https://transparenciacolombia.org.co/que-hacemos/justicia-y-sancion/>.

projects, activities, business partners and personnel, among others;

Event: Any act of Corruption, Bribery or Transnational Bribery that may occur in Corona's operations.

Risk Management: It is the application of tasks such as setting the context, identifying, analyzing, assessing, treating, monitoring and communicating risks, to reduce the probability of occurrence of an event, its consequences, or both;

Control List: Any list used for the control of money laundering, financing of terrorism and acts of Corruption, Bribery and Transnational Bribery;

Lobbying: Those activities carried out by individuals or companies to promote, defend or represent any particular interest and/or influence the decisions of the authorities;

SAGRILIFT Manual: This is the document adopted by Corona which establishes the criteria and procedures of Due Diligence to approve the engagement of counterparties;

Corporate Bodies: Depending on the type of company, these will be the meeting of partners, the general shareholders' meeting and the board of directors, if applicable;

Monitoring: The continuous and systematic process by which the progress of an activity, action or system is recorded to identify changes;

Compliance Officer: It refers to the person designated by Corona who is responsible for verifying adequate and timely compliance with this PTEE, without prejudice to his or her obligations with respect to the Self-Control and Risk Management System for Money Laundering and Financing of Terrorism and any other function assigned by Corona;

Facilitation Payments: These are small, unofficial and improper payments made to obtain or expedite the performance of a routine or necessary action to which the payer is entitled;

PEP: It means Politically Exposed Persons, i.e., national or foreign persons who by reason of their position handle public resources or hold some degree of public power, including any employee or Public Officer. For the purposes of this PTEE, the term PEP also includes Publicly Exposed Persons, i.e., persons who enjoy public recognition;

Compliance Policies: They refer to those defined in Chapter VI of this PTEE;

PTEE: It refers to this document;

Internal Reports: These are reports made within Corona when there is awareness of a possible act of Corruption, Bribery or Transnational Bribery;

Audit: Corona's external control body;

Warning Sign: It refers to relevant information from which it can be inferred the possible existence of an event or situation that escapes from what Corona considers as normal, or that is not part of the ordinary course of its business;

Public Officer: Any person holding a legislative, executive, administrative or judicial position or exercising a public function; in a state, its political subdivisions or local authorities, or a foreign jurisdiction. Any officer or agent of a public international organization shall also be considered a Public Officer;

Bribery: The act of offering, promising or granting, directly or indirectly, an advantage by workers and employees, Administrators, Senior Managers, Associates of Corona with the intention of inducing the improper execution of a business or public or private function, particularly when such offer, promise or payment is considered dishonest, illegal or a breach of trust, for the benefit of Corona or a third party.

Likewise, Bribery is considered to be the act of requesting, agreeing, receiving or accepting an economic or other benefit from a worker or employee, Administrator, Senior Manager or Associate with the intention of performing an inappropriate function or activity that involves a dishonest, illegal act or a breach of trust.

Transnational Bribery: It is the act by virtue of which an individual, through its collaborators, Administrators, Associates, contractors or subordinate companies, gives, offers or promises to a foreign Public Officer, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value or (iii) any benefit or profit in exchange for such Public Officer performing, omitting or delaying any act related to his/her functions and in connection with an international business or transaction.

Advantage: It means any gift or benefit, whether financial, monetary or otherwise, including, but not limited to, cash, securities, gifts, goods, services, benefits and employment positions.