

ANTI-CORRUPTION POLICY

1. GENERAL FRAMEWORK

1.1 PURPOSE

CANAL CLIMA S.A.S. (“CANAL CLIMA” or the “Company”) is committed to adhering to the highest ethical standards and complying with all applicable anti-corruption laws and regulations.

The purpose of this Anti-Corruption Policy (the “Policy”) is to define and establish guidelines for the identification, prevention, detection, and mitigation of corruption and transnational bribery (C/TB) risks, within a framework that promotes conduct aligned with the ethical principles set forth in the Code of Conduct and Ethics, ensuring that business and operations are carried out in an ethical, transparent, and honest manner.

Through the foregoing, this Policy aims to guide all Employees of CANAL CLIMA, as well as any third party or contractor working for or on behalf of CANAL CLIMA, including the COLCX Program, regarding the guidelines and policies applicable to the prevention of corruption and/or bribery.

1.2 DEFINITIONS

Capitalized terms used in this document that require a special definition are defined in the attached Glossary.

1.3 SCOPE AND APPLICATION

This Policy applies to any Director, Officer, or Employee of the Company, as well as to its Suppliers and other third parties representing CANAL CLIMA. All Employees of the Company and Suppliers must acknowledge their knowledge and acceptance of this Policy in writing within the corresponding contracts.

2. POLICY PRINCIPLES AND STATEMENT

Under this Policy, Canal Clima declares a ZERO-tolerance position toward Corruption and Bribery in any of its forms.

Accordingly, at Canal Clima, Employees and Directors must:

- Comply with national and international anti-corruption regulations.



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- Always prioritize adherence to ethical principles over the achievement of commercial objectives, recognizing that it is essential to foster a culture oriented toward applying and enforcing this Policy.
- Refrain from offering, promising, giving, or requesting any object, incentive, bribe, or undue advantage of any value, directly or indirectly, as an inducement to obtain a benefit.
- Refrain from offering, promising, or giving to a Government Official, directly or indirectly, sums of money, anything of pecuniary value, or any other benefit or utility, in exchange for the Government Official performing, omitting, or delaying any act related to the exercise of their duties and/or in connection with an act, Business, or International Transaction.
- Refrain from making facilitation payments, understood as payments made to expedite procedures before governmental entities, which are prohibited under this Policy, unless authorized by the Compliance Officer and permitted under the laws of the country where the procedure is carried out.
- Refrain from receiving or making donations that do not have a lawful purpose or where there is suspicion that they may serve to conceal acts of corruption or bribery or to obtain advantages in CANAL CLIMA's business activities.
- Conduct Due Diligence to properly know potential Clients and Suppliers, particularly regarding any relationship with Government Entities or Government Officials.
- Report or disclose, through the Ethics Hotline or directly to the Compliance Officer, any act of Corruption or Bribery or any breach of this Policy.

3. POLICY GUIDELINES

The following guidelines are established to identify, prevent, and mitigate Corruption and Bribery risks:

3.1 Conflict of Interest



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A Conflict of Interest arises when the personal, family, and/or business interests—direct or indirect—of an Employee may conflict or compete with the interests of the Company, interfere with the fulfillment of the Employee’s obligations to CANAL CLIMA, or affect their performance or impartiality.

All CANAL CLIMA Employees must prevent Conflicts of Interest and, if prevention is not possible, must disclose to the Compliance Officer or their Immediate Supervisor any situation that could constitute a Conflict of Interest, either by email or through the conflict of interest disclosure form. In case of doubt, guidance must also be sought from the Compliance Officer.

The Grupo RFC Code of Conduct and Ethics contains the guidelines for the prevention, management, disclosure, and administration of situations that constitute or may constitute a conflict of interest, in accordance with applicable laws and the Company’s ethical standards.

Regarding the COLCX Program business line—a certification and registration program for greenhouse gas (GHG) mitigation initiatives—the Conflict of Interest Policy for the COLCX Program, attached to this Policy, must be applied. The COLCX Program Conflict of Interest Policy establishes guidelines applicable to board members, consultants, validation and verification bodies (VVBs), project owners and proponents, and any other stakeholder involved in the registration and certification of GHG mitigation initiatives, ensuring impartial decision-making and the protection of the organization’s interests.

3.1.1 Declaration and/or Disclosure:

The available means for disclosing a Conflict of Interest are:

- (i) informing at the time of joining CANAL CLIMA
- (ii) informing the immediate supervisor or superior
- (iii) reporting it annually in the conflict of interest declaration; or
- (iv) informing the CANAL CLIMA Compliance Officer.

In case of doubt, guidance should be requested from the Compliance Officer or CANAL CLIMA’s legal advisor.

3.1.2 Conflict of Interest Procedure

The procedure to be followed in the event of a Conflict of Interest is described below:



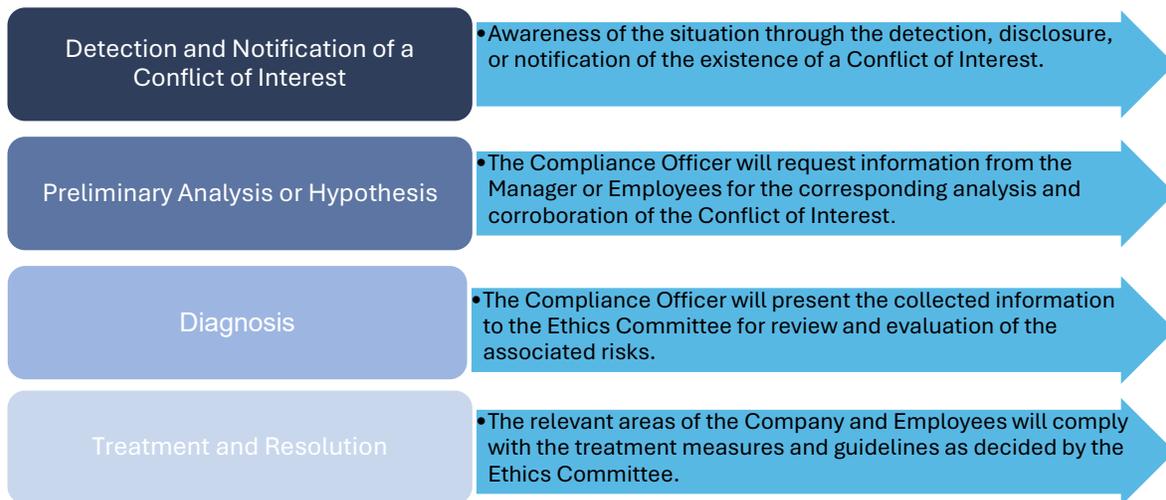
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- a) When Employees identify a situation that constitutes a real or potential Conflict of Interest, they must notify the Compliance Officer or their Direct Supervisor by email and complete the conflict-of-interest disclosure form.
- b) Once the situation has been reported or directly identified, the Compliance Officer shall coordinate the request and collection of the information deemed necessary to analyze the situation together with the direct supervisor or the General Manager.
- c) After analyzing the situation, the Ethics Committee—composed of the General Manager, a member of the Board of Directors, the Administrative and Financial Manager, and the Compliance Officer—shall determine the mitigation mechanisms and the measures or agreements to be adopted to resolve the Conflict of Interest.
- d) If the reported case or the situation under analysis involves or impacts the COLCX Program business line, an external advisor or consultant with expertise in reputational matters and the carbon projects business shall be invited to participate in the Ethics Committee, in accordance with the **Ethics Committee Regulations** and the **COLCX Program Governance Model**.
- e) In the meantime, and until a decision has been made and communicated, the Employee involved in a potential Conflict of Interest must refrain from participating in any deliberation, selection, appointment, or decision-making related to CANAL CLIMA's business concerning the specific situation giving rise to the potential Conflict of Interest.
- f) The Compliance Officer shall communicate the decision or measures adopted to the relevant area, the immediate supervisor, and the Employee in order to resolve or mitigate the impact of the potential conflict, responding to the initial notification email.
- g) The Ethics Committee may request the implementation of additional measures from time to time.



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- h) If the Conflict of Interest is disclosed by a member of the Ethics Committee, the situation shall be analyzed by the remaining members of the Ethics Committee and by the Board of Directors.

3.2 Donations

CANAL CLIMA recognizes that, in general terms, Donations constitute a potential risk in relation to Bribery or Corruption; however, it considers donations to be an essential part of the Company's role in contributing to society.

Therefore, in order to preserve legality and transparency in Donations, the following guidelines must be observed:

- All Donations must comply with the Due Diligence established in the "Due Diligence and Segmentation" procedure.
- All Donations must have a lawful purpose and must be carried out in accordance with the applicable legal formalization procedures.
- Donations made in exchange for obtaining advantages in CANAL CLIMA's business or commercial transactions are strictly prohibited.

3.3 Transparency in Books, Financial Records, and Accounting

All Employees and Directors at CANAL CLIMA are committed at all times to the integrity, accuracy, and reliability of accounting and financial information, which must fairly and accurately reflect all transactions in reasonable detail, in accordance with applicable accounting and tax standards.

It is strictly prohibited to engage in conduct intended to conceal, alter, omit, or misrepresent accounting records in order to hide improper activities or to misstate the true nature of a recorded transaction.

CANAL CLIMA will not tolerate any dishonest or inaccurate reporting in its accounting books or records.

Employees are prohibited from:

- Falsifying or omitting the recording of any amount paid or received in any transaction
- Altering any invoice or supporting documentation
- Reporting or organizing information in a manner intended to deceive or misinform, or intentionally concealing or disguising the nature of any transaction
- Maintaining unrecorded funds or assets, or "off-the-books" records related thereto, outside CANAL CLIMA's official recordkeeping systems
- Intentionally destroying financial records or supporting documents before the retention period established under CANAL CLIMA's document retention guidelines
- Recording representation expenses that are not duly justified



- Making unusual changes to records or accounting entries intended to conceal the true nature of transactions.

3.4 Gifts, Hospitality, and Entertainment

Relationships with business partners, Clients, and Suppliers must be based on transparency and on safeguarding CANAL CLIMA's best interests within an ethical framework.

In the course of CANAL CLIMA's activities, reasonable Gifts, hospitality, and entertainment—such as advertising or promotional items—may be permitted, provided that the guidelines set forth in this Policy are observed.

Gifts and hospitality given to or received from Suppliers or third parties with whom there is a business relationship are acceptable if they are modest in value, reasonable, and appropriate to the business relationship; if they are not given or received with the intent of obtaining an improper advantage; and if they do not create the appearance of impropriety, all in accordance with this Policy.

At CANAL CLIMA, it is prohibited to give Gifts or to pay, even if modest in value, for meals, travel, accommodation, or entertainment for a corrupt purpose or to gain an undue advantage.

For the giving or receiving of gifts, or the offering or acceptance of hospitality or entertainment, the following rules must be observed:

3.4.1 Prohibited Conduct Regarding Gifts

- Offering, giving, or accepting Gifts, Hospitality, or Entertainment Activities for oneself or a family member in exchange for granting an advantage, obtaining a benefit (e.g., closing a deal), or disregarding any procedure, whether in favor of the Company or against a third party.
- Offering, giving, or accepting Gifts, Hospitality, or Entertainment Activities when a decision is pending or where such actions could affect a third party's judgment.
- Under no circumstances may gifts in cash or cash equivalents be given or received from third parties.
- Giving gifts, invitations, or hospitality using petty cash funds.
- Offering or giving Gifts or hospitality to Government Officials, particularly for the purpose of exerting undue influence, influencing actions or decisions, or obtaining an improper advantage for the Organization.
- Offering, giving, or accepting Gifts, Hospitality, or Entertainment Activities—even if modest in value—repeatedly from the same third party on more than three (3) occasions.
- All gifts or hospitality that do not comply with the parameters or guidelines of this Policy must be rejected. If it is not possible to return a Gift, it must be delivered to the Compliance Officer for a company raffle or for use in employee welfare initiatives organized by Human Resources.



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3.4.2 Permitted Conduct Regarding Gifts

- Promotional or “merchandising” Gifts are permitted, meaning advertising materials of modest or symbolic value such as branded pens, notebooks, calendars, caps, T-shirts, thermoses, mugs, and related promotional items, provided they do not exceed the amount established in this Policy.
- Gifts must be of modest or symbolic value, whether given individually or considered together with other gifts or hospitality offered to or received from the same third party.
- Gifts not exceeding two hundred thousand Colombian pesos (COP \$200,000) may be accepted. If a Gift exceeds this amount, it must be reported to the Compliance Officer.
- Invitations to Entertainment Activities or hospitality must be reported to the Compliance Officer and may only be accepted if they are modest, reasonable, appropriate, proportionate to the type of business activity and the employee’s position, and not intended to influence or obtain an improper advantage.
- Invitations to academic, training, or technical events from a Supplier or third party must be addressed institutionally, i.e., in the name of CANAL CLIMA. The immediate supervisor and the Compliance Officer must be informed, and their approval obtained. Such invitations may be accepted only if they are related to the contractual or commercial relationship with the inviting party. Depending on the Compliance Officer’s assessment, the Company must cover all or part of the travel and accommodation expenses related to such invitations.

3.4.3 Obligation of Disclosure and Reporting

- Any gift exceeding the local currency equivalent of two hundred thousand Colombian pesos (COP \$200,000) must be reported to the Compliance Officer.
- Employees must consult their supervisors and/or the Compliance Officer if in doubt as to whether an invitation, hospitality, or gift is appropriate.
- Any hospitality or invitation to an Entertainment Activity given by a third party or Supplier to an Employee must be reported to the immediate supervisor and the Compliance Officer and must receive their approval.
- Any suspicion of an attempted bribe by a third party, or any related request, must be immediately communicated to the Compliance Officer or reported through the Ethics Hotline.

3.5 Prohibition of Facilitation Payments:

Facilitation payments are prohibited at CANAL CLIMA regardless of their amount. Facilitation payments are payments made to Government Officials in order to secure or expedite routine governmental actions or procedures for the benefit of an Employee or CANAL CLIMA.



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Such payments may include:

- Payments to expedite or facilitate obtaining an operating license or an employee visa.
- Payments to accelerate a procedure or decision.
- Payments to obtain a public service.

3.6 Dealings with Government Officials and/or Government Entities

Any matters conducted by CANAL CLIMA involving interaction with Government Entities or Government Officials entail increased exposure to Corruption risk.

Therefore, CANAL CLIMA requires that any contact or interaction by its Employees and Contractors with Government Officials be conducted with transparency, integrity, and openness, and in compliance with the following guidelines:

- Employees must refrain from holding one-on-one meetings with Government Officials; they must be accompanied by another Company employee or collaborator.
- Under no circumstances, during interactions with Government Officials, shall any action or communication be made that seeks to promise, offer, or give any benefit in order to obtain an advantage that could lead to the commission of a Corrupt or Bribery act. Accordingly, all communications with Government Officials must involve appropriate language to avoid statements that could be perceived as improper, misleading, or contrary to the law.
- Meetings with Government Officials must take place at the Company's offices, operational facilities, or at the offices of the relevant Government Entities. Employees must refrain from holding meetings in entertainment or leisure venues.
- Any irregularity perceived during interactions with a Government Official must be reported to the Compliance Officer and Management, or through the Ethics Hotline.

3.7 Communication and Training

Employees:

Under the coordination of the Compliance Officer and the Administrative and Financial Management, the internal channels and conditions for dissemination of this Policy shall be determined.



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CANAL CLIMA shall communicate and disseminate this Policy through emails and training sessions for Employees, which shall be conducted at least once per year.

The following must be observed:

- Attendance at training sessions is mandatory for Employees who are invited.
- After completing the training, Employees must take an evaluation to ensure that the concepts have been understood.
- The concepts are considered assimilated if the Employee achieves at least 60% correct answers. Below this percentage, the evaluation must be repeated. Employees may repeat the evaluation or the training.
- If the passing percentage is not achieved after three attempts, the Compliance Officer shall inform the Employee's immediate supervisor and the Administrative and Financial Management so that this aspect may be considered in the performance evaluation or disciplinary measures.
- Records must be kept of the training materials used, attendance, and evaluation results.

Suppliers and Contractors

This Policy also applies to all Suppliers, Contractors, and other third parties engaged by CANAL CLIMA to conduct business on its behalf.

All written contracts between CANAL CLIMA and Suppliers or other third parties must include relevant anti-corruption representations and warranties. They must also include clauses acknowledging awareness of and compliance with this Policy and applicable anti-corruption laws and regulations, as well as CANAL CLIMA's right to terminate the contract in the event of a violation of this Policy or any applicable anti-corruption law or regulation.

3.8 Reporting Channel

If an Employee or member of Management has information, doubts, or suspicions regarding any form of corruption, fraud, or bribery, they must immediately report it to their Direct Supervisor, the Compliance Officer, or through the Ethics Hotline.

The reporting channel used at CANAL CLIMA is the following Ethics Hotline, which guarantees anonymity and confidentiality and is administered by an independent third party:

- Toll-free line: 01-800-752-2222 (Option 1 live operator, Option 2 recorded message)



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- Email: lineaetica.rfc@resguarda.com
- Website: www.resguarda.com/lineaeticagruporfc
- WhatsApp: +57 1 7868154

This channel may be used to report any breach of this Policy, improper or unethical conduct, or suspicion of any act of corruption or bribery.

The following rules and guidelines apply to reports:

- Individuals using the reporting channel are entitled to confidentiality regarding the information reported and to anonymity if they so choose.
- CANAL CLIMA guarantees that there will be no retaliation, direct or indirect, against individuals who submit reports in good faith.
- The operation of the Ethics Hotline is based on the principles of independence, confidentiality, feedback, follow-up, transparency, and non-retaliation.
- CANAL CLIMA will not accept false or malicious reports. If such reports are proven to be false or not made in good faith, such conduct will be considered a violation of this Policy.
- The Ethics Committee, together with the responsible areas, shall conduct the investigations required regarding Employees to verify facts related to reports of non-compliance with the Program. The results of such investigations shall be reported to the Board of Directors.

3.9 Sanctions

Any situation involving non-compliance with this Policy or its guidelines by a CANAL CLIMA Employee shall be considered a serious offense and may therefore be subject to disciplinary sanctions in accordance with the Internal Work Regulations.

The disciplinary sanctions established under the Internal Work Regulations do not exclude or exempt the responsible party from facing any applicable civil or criminal sanctions, as the case may be.

Document Control

Version	Description of Change	Date	Prepared and Reviewed by
1	Implementation of the Anti-Corruption and Anti-Bribery Policy	2019	Administrative Management



2	Update of the Anti-Corruption Policy	12/03/2025	Compliance Officer and Administrative Management
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GLOSSARY

This Glossary contains the definitions included in the PTEE and its Annexes or Related Documents.

Administrators: legal representatives and their alternates, when they replace them in cases of accidental, temporary, or absolute absences; the liquidator; members of the Board of Directors; and those who, according to the bylaws and law, perform or hold such functions.

Hospitality (Atenciones): refers to travel or lodging expenses offered by a Third Party or provided to a Third Party by a CANAL CLIMA Employee.

Beneficial Owner: the natural person(s) who ultimately owns or controls a client or the natural person on whose behalf a transaction is conducted. This also includes the person(s) who exercise effective and/or ultimate control, directly or indirectly, over a legal entity or other structure without legal personality. Beneficial Owners of a legal entity include:

- a) A natural person who, acting individually or jointly, exercises control over the legal entity, in accordance with Article 260 et seq. of the Commercial Code; or
- b) A natural person who, acting individually or jointly, directly or indirectly holds 5% or more of the capital or voting rights of the legal entity, and/or benefits from 5% or more of the entity's profits, earnings, or assets;
- c) When no natural person can be identified under (a) or (b), the natural person holding the position of legal representative, unless there is another natural person with greater authority regarding management or governance of the legal entity.

Beneficial Owners of a trust, structure without legal personality, or similar legal structure include:

- I. Settlor(s), trustor(s), constituent(s), or equivalent positions;
- II. Fiduciary committee, financial committee, or equivalent positions;
- III. Beneficiary(ies) or conditional beneficiaries; and
- IV. Any other natural person who exercises effective and/or ultimate control, or has the right to enjoy and/or dispose of the assets, benefits, results, or profits.

Safeguard Clause: refers to clauses that must be included in all contracts entered into by CANAL CLIMA with any third party or Counterparty, aimed at preventing and controlling LA/FT and C/ST risks in contractual relationships.

Conflict of Interest: arises when an Employee's personal, family, and/or commercial interests, directly or indirectly, may conflict with the Company's interest, interfere with the Employee's obligations to CANAL CLIMA, or affect their performance or impartiality.



A conflict of interest also occurs when an Employee receives improper personal benefits as a result of their position at CANAL CLIMA.

Counterparty: any natural or legal person with whom CANAL CLIMA has commercial, business, contractual, or legal relationships. Counterparties include, among others, Employees, Suppliers, Clients, Contractors, Donors, and Donees.

Contractor: in the context of a business or transaction, any third party providing services to CANAL CLIMA or having a contractual legal relationship of any type. Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants, and participants in collaboration contracts, joint ventures, consortia, or risk-sharing arrangements with CANAL CLIMA.

Corruption: any act that harms CANAL CLIMA's interests or assets and violates the values of transparency and integrity. Corruption acts may include bribery and, more broadly, offenses against public administration, crimes against the environment, economic crimes, and other forms of corruption.

General Director: person appointed by CANAL CLIMA to hold the position of legal representative.

Due Diligence: refers to the process of continuous and periodic review and assessment of contractors and counterparties in accordance with corruption and/or bribery risks.

Enhanced Due Diligence: the process by which the Company adopts additional and more intensive measures to understand the Counterparty, their business, operations, Products, and transaction volumes, according to established segmentation and higher risk levels.

Employees: all individuals who have an employment or service relationship with CANAL CLIMA.

Entertainment: invitations to social, cultural, sporting, or other events attended by the third party with the CANAL CLIMA Employee.

Government Entity: any authority or governmental body, national or international, at the federal, state, or municipal level; public institutions or decentralized entities; judicial offices; state-owned or controlled commercial enterprises; international organizations and agencies such as the World Bank or Red Cross; political parties or party officials, among others. Also includes any agency, office, or subdivision at any territorial level (federal, central, regional, or local) in any country and all entities partially or fully owned or operated by the government (e.g., public schools and hospitals).

C/ST Risk Factors: potential elements or causes that generate C/ST risk.



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Immediate Family: spouse and/or relatives up to the fourth degree of consanguinity, first and second degree of affinity, or first-degree civil relations.

Degrees Of Kinship			
Consanguinity		Affinity	
Kinship	Degree	Kinship	Degree
My parents	1°	My spouse	1° 2°
My children		My parents-in-law	3°
My siblings	2°	My sons-in-law	
My grandparents		My daughters-in-law	
My grandchildren		My brothers-in-law	4°
My uncles	3°	Civil	
My nephews		Kinship	Degree
My great-grandchildren		Adoptive children	1°
My first cousins	4°	Adoptive parents	

Terrorism Financing (TF): A set of activities aimed at channeling lawful or unlawful resources, directly or indirectly, to provide, collect, deliver, receive, manage, contribute, safeguard, or store funds, assets, or resources, or to perform any other act that promotes, organizes, supports, maintains, finances, or economically sustains organized crime groups, armed groups operating outside the law or their members, national or foreign terrorist groups, national or foreign terrorists, or terrorist activities.

Financing of the Proliferation of Weapons of Mass Destruction (FPWMD): Any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, trafficking, handling, transport, transfer, storage, or dual-use for illegitimate purposes in violation of national laws or international obligations, when applicable.



Government Official: Any employee or person acting on behalf of a Government Entity. This includes anyone working for a Government Entity or considered a public official according to the applicable laws of their country. It also includes individuals performing public functions on behalf of a political party. Additionally, employees and officials of state-owned or state-controlled companies are included. Government Officials also include political party officials and employees, political candidates, and officials of public international organizations (e.g., Red Cross).

Board of Directors: According to Article 434 of the Commercial Code, the board of directors is a mandatory collegiate administrative body in joint-stock companies, composed of at least three members and their respective alternates.

Ethics Line: The independent channel established by CANAL CLIMA S.A.S to receive reports regarding violations of internal CANAL CLIMA policies and/or unethical or inappropriate practices.

Risk Matrix: A tool to identify risks of corruption, transnational bribery, money laundering, terrorism financing, and proliferation financing of weapons of mass destruction.

International Business or Transactions: Business or transactions of any nature with foreign natural or legal persons, whether public or private law.

Gifts: Any item of value such as discounts, gift cards, favors, subsidies, goods, equipment, or services given by Employees to third parties, or by third parties to Employees.

Compliance Officer: The person appointed by CANAL CLIMA responsible for promoting and developing specific procedures for the prevention, monitoring, and mitigation of money laundering, terrorism financing, corruption, and domestic and transnational bribery risks.

Facilitation Payments: Payments that may be offered or given to expedite routine governmental procedures.

Politically Exposed Person (PEP): Public officials at any level of the national or territorial public administration, performing functions such as issuing regulations, general management, policy-making, implementing plans/programs/projects, managing state assets, administering justice, or having administrative sanction powers, as well as private individuals responsible for resources in political movements or parties.



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These functions may be executed through budget allocation, public contracting, investment project management, payments, settlements, or asset administration.

Examples of PEPs include:

- President, Vice President, Ministers, Deputy Ministers, and administrative department directors.
- Secretaries-General, Treasurers, CFOs of ministries, administrative departments, or superintendencies.
- Directors, managers, secretaries-general, treasurers, and CFOs of public establishments, special administrative units, state-owned enterprises, public health companies, state industrial and commercial enterprises, and mixed-economy companies.
- Superintendents and deputy superintendents.
- Generals of the Armed Forces and National Police, inspectors, and officers authorized to commit public resources.
- Governors, mayors, council members, treasurers, and secretaries-general at departmental, municipal, and district levels.
- Senators, representatives, and administrative directors of the Senate and House of Representatives.
- Bank of the Republic managers and co-directors.
- Directors of regional autonomous corporations.
- High-level judicial and fiscal officials.
- Notaries, urban curators, and public university budget officers.
- Legal representatives, presidents, directors, and treasurers of political parties and movements.
- Settlers of autonomous patrimonies or trusts managing public resources.

PEP Status Duration: Remains during the term in office and for two (2) years after leaving, resigning, being dismissed, or terminated.

International Organization PEPs: Individuals holding management roles in international organizations such as the United Nations, OECD, UNICEF, or the Organization of American States (OAS), including directors, deputy directors, board members, or equivalent positions.

Foreign PEPs: Individuals holding prominent public positions in another country, such as heads of state, ministers, parliamentarians, supreme or constitutional court members, central bank directors,



ambassadors, senior military officials, state-owned enterprise managers, members of reigning royal families, political party leaders, or senior executives of international organizations.

COLCX Program: A CANAL CLIMA business line for certification and registration of greenhouse gas (GHG) mitigation initiatives, contributing to sustainable development and promoting environmental markets through carbon credit certification and registration (COLCERS).

Supplier: A person or entity selling or providing goods or services to CANAL CLIMA in exchange for monetary or in-kind compensation.

Corruption Risk: The possibility that, through action or omission, public administration purposes are diverted, or public assets are affected for private gain.

Transnational Bribery Risk (ST Risk): The possibility that a legal entity, directly or indirectly, gives, offers, or promises money, valuable objects, or any benefit to a foreign public official in exchange for performing, omitting, or delaying actions related to their duties in connection with an International Business or Transaction.

Bribery: The offering, promising, or payment of (i) money, (ii) objects of monetary value, or (iii) other benefits or advantages, by a CANAL CLIMA employee to a third party, private or public, to influence actions or decisions in relation to a CANAL CLIMA business.

Transnational Bribery: When the Company, through its employees, executives, counterparties, or subsidiaries, directly or indirectly gives, offers, or promises a foreign public official money, objects of value, or benefits to influence or delay actions related to an international business or transaction.

Third Party: Any natural or legal person with whom CANAL CLIMA has a commercial, business, or financial relationship different from an employment relationship.

