

PERSONAL DATA PROTECTION AND PROCESSING POLICY

INTRODUCTION

The CONFIPETROL¹ Group (hereinafter, "THE COMPANY"), is aware of the correct use and processing of personal data and information obtained or transferred by its stakeholders (customers, suppliers, employees, candidates, associates, board of directors or management, communities, visitors, and/or any related third party), hereinafter "STAKEHOLDERS", or because of their relationship with THE COMPANY.

In line with the above, we have a commitment to respect, guarantee and protect the privacy and confidentiality of the private information and personal data of our STAKEHOLDERS, guaranteeing the respective and correct use and processing thereof.

AIM AND PURPOSE

The purpose of this Personal Data Protection and Processing Policy (hereinafter, "THE POLICY") of THE COMPANY is to adopt and define the guidelines applicable to the processing of personal data of its STAKEHOLDERS, ensuring their confidentiality and protection.

The aim of this policy is to inform our STAKEHOLDERS about the way in which their personal data and information is collected, processed and protected, and to inform them of their rights, as well as the duties of the COMPANY in this matter.

THE POLICY shall establish the guidelines and directives of the internal procedures² corresponding to each country³ in which THE COMPANY operates and develops its business, thus complying with the provisions of the applicable law in force in each of such countries.

Notwithstanding the foregoing, all employees and/or members of the STAKEHOLDERS that in the exercise of their duties must handle personal information of THE COMPANY and of the STAKEHOLDERS shall abide by the POLICY and procedures of each country, as applicable.

It is worth noting that private personal information does not include information available from public sources.

¹ For the purposes of this POLICY, "CONFIPETROL Group" is considered to be the group of companies in which CONFIPETROL S.A.S. (Colombia) operates directly or indirectly at international level, either through consortiums, consortium companies, affiliates, subsidiaries, branches, or any company or entity where it has participation now or in the future; being considered at the date of issuance of this POLICY the countries of Peru (Confipetrol Andina S. A.), Chile (Confipetrol Chile S.p.A.), Argentina (Confipetrol S.A.S. Sucursal Argentina), and Bolivia (Confipetrol S.A.S. Sucursal Bolivia).

² The term "Procedure" refers to the instructive document that defines the specific guidelines for the development of the activity or process, describing the objective, scope, terminology, responsibilities, etc., applicable to the Policy or different processes subject to compliance.

³ As of the date of issuance of this Policy, THE COMPANY operates and conducts its business in Colombia, Peru, Bolivia, Chile, and Argentina.

SCOPE

THE POLICY is directed to the STAKEHOLDERS, who must comply with all the terms, procedures and guidelines established by law and all current and applicable legal regulations regarding the protection of personal data and habeas data rights in the countries where CONFIPETROL operates and conducts business.

THE POLICY shall apply to all those processes that involve personal data information of the STAKEHOLDERS, which make them susceptible to processing, and to any form of subsequent use of this data and shall be mandatory and strictly complied with.

LEGAL SCOPE

THE POLICY is governed by the legislation applicable and in force in each country in which THE COMPANY operates and conducts its business activities.

DEFINITION OF CONCEPTS AND TERMINOLOGY

For understanding, interpreting and applying THE POLICY, the following definitions are established, in general terms, applicable in the countries in which THE COMPANY operates and conducts its business, in accordance with applicable and current law:

- **Authorization:** The prior, express, and informed consent given by the subject of any personal data for the company to carry out the processing of his/her personal data.
- **Data Base:** Organized collection of personal and/or business data, whether automated or not, regardless of the format, whether physical, magnetic, digital, optical or other that may be created, whatever the form or modality of its creation, generation, storage, organization and access, which is object of processing.
- **Personal data:** Any information linked or linkable to a particular or determinable natural person or persons by means that can be reasonably utilized.
- **Sensitive data:** those that affect the privacy of the Subject of personal data or whose improper use can generate discrimination, such as, physical or moral characteristics of persons or facts or circumstances of their private life or intimacy, such as personal habits, racial origin, ideologies and political opinions, religious beliefs or convictions, physical or psychological health conditions and sexual life.
- **Business data:** Any information linked to a legal entity, company name, corporate name and/or organization.
- **Suppression (deletion or cancellation of data):** The destruction of data stored in registers or databases, whatever the procedure used for this purpose, in those cases in which it is appropriate.
- **Data processor or data base manager:** Natural person or legal entity, public or private, that by itself or acting jointly with others, carries out the processing of data and information on behalf of the data controller or database owner (personal or business).
- **Cross-border data flow:** International transfer of personal or business data to a recipient located in a country other than the country of origin of the personal or business data, regardless of the medium on which the data is held, how the transfer was affected or the processing of the data.
- **Modification of data:** any change in the content of data stored in registers or databases.

- **Dissociated data (anonymized):** Data that does not allow direct or indirect identification of its subject.
- **Personal data subject:** Natural person whose personal data and/or information is the subject of processing.
- **Business data subject:** Natural person or legal entity, owner of the business data and/or information to be processed.
- **Data Controller or Database Subject:** Natural person or legal entity, public or private, that determines the purpose and content of the database, its processing and security measures.
- **Data transfer:** sending, supplying, or disclosing personal and/or business data, of a national or international nature, to a natural or legal person, or to a public entity, other than the subject of the personal and/or business data.
- **Data processing:** Any operation or set of operations involving personal and/or business data, whether automated or not, such as collection, recording, organization, storage, preservation, processing, modification, extraction, transfer, dissemination, consultation, use, circulation, blocking, deletion, communication and/or any other form of processing that facilitates access to the data.

The aforementioned terms and definitions, as well as any other additional terms and definitions, shall be specified and expanded in the corresponding Procedures applicable to each country in which THE COMPANY operates and conducts business.

PURPOSE OF DATA COLLECTION

THE COMPANY will use the data collected or to which it has access, for the execution and development of its corporate purpose, for lawful purposes, in accordance with the provisions of the Constitution and applicable laws, which are communicated with consent, in a free, prior, clear, express, voluntary, and informed manner, establishing the treatment and purpose to which such data will be subjected. The aforementioned communication will be made to the STAKEHOLDERS through the means defined by THE COMPANY.

The data are managed and stored in databases and/or information systems of THE COMPANY, in accordance with the purpose for which they were collected, with the purpose of their processing in accordance with the applicable legal provisions in force and the administrative, accounting, tax, legal, historical and conservation aspects of the information.

RIGHTS OF THE PERSONAL AND/OR CORPORATE DATA SUBJECTS

The owners of the personal and/or business data contained in the databases, files, information systems or similar of THE COMPANY, have the right, in accordance with the applicable legislation and legal requirements in force, to:

- a) Receive the request for authorization and/or consent for the processing of their data, subject to the exceptions provided for in the legislation in force applicable to each country.
- b) Issue the authorization and/or consent for the processing of their personal and/or business data.
- c) Submit requests, inquiries, petitions, complaints, or claims related to the processing of their data to the COMPANY.

- d) Submit requests for access, updating, inclusion, rectification, cancellation, opposition⁴ and/or suppression of their personal and/or business data, as well as the information contained in databases, files, information systems and similar, about which they are holders; except when there is a legal or contractual obligation that prevents it.
- e) Request from THE COMPANY proof of the authorization granted for the processing of their personal and/or business data.
- f) Obtain from THE COMPANY, response to inquiries, requests, complaints, claims, requests for rectification, updating, access, deletion, cancellation, opposition, or revocation of their personal data and / or business data recorded through the means established by THE COMPANY, so that it is easy to read and without technical barriers that impede their understanding. For this purpose, the holder may authorize his legal representative or his assignees as appropriate.
- g) Be informed by the data controller or by the database subject, upon request, regarding the use that will be given or has been given to their personal data and/or business data, and other requirements for each country.
- h) File before the competent authority⁵ complaints for infringements to the provisions of the applicable legislation in force regarding personal and/or business data.

The Procedures applicable to each country in which THE COMPANY operates and conducts business shall establish the specific rights applicable to the subjects of personal and/or business data.

In general, the holders of the data may request access, updating, inclusion, rectification, cancellation, opposition and/or deletion of the same, once the purpose for which THE COMPANY requested their data has been fulfilled or when the term foreseen for its use has elapsed, provided that the time frame is explicitly defined. However, the data will be retained by THE COMPANY, when so required, in compliance with a legal or contractual obligation.

COMPANY OBLIGATIONS WITH REGARD TO THE PROCESSING OF PERSONAL AND/OR BUSINESS DATA

THE COMPANY has the following obligations in the execution of THE POLICY, in accordance with current legislation and legal requirements:

- a) a) Ensure the protection of personal and/or business data.
- b) Adopt measures and procedures within THE COMPANY so that its employees respect the processing of the data of the subjects who have so authorized and/or consented.
- c) Inform the subject of the personal and/or business data regarding the purpose of the storage of their personal and/or business data and its possible communication to the public.
- d) Request from the subject of the personal and/or business data, authorizations for its processing, except for exceptions provided for in the legislation in force applicable to each country.

⁴ Right allowing the data subject to object to the processing of his/her data, on legitimate and well-founded grounds, unless otherwise provided by law.

⁵ Competent Authority is understood to be the government holder or authority that has the necessary competence for a specific public legal action, which generally involves the exercise of power. For the purposes of THE POLICY, the competent authority shall be the governmental entity of the country in which THE COMPANY operates and conducts its business.

- e) Maintain the authorization and/or consent for data processing issued by the subject and/or have it available to be consulted at a later date.
- f) Obtain authorization and consent from the subject of the data, when it is required to provide it to a third party, to be in charge of the processing of personal and/or business data subject to processing.
- g) Adopt the necessary security measures to prevent alteration, loss, consultation, use or unauthorized or fraudulent access to personal and/or business data.
- h) Regulate if required, in contracts with third parties, access to databases, files, information systems and similar containing personal and/or business data.
- i) At the time of data collection, inform the subject of the data, the purpose for which the information is collected as well as its processing.
- j) Collect updated, necessary, relevant and adequate data, in relation to specific, explicit and lawful purposes for which they have been obtained.
- k) Answer the queries and requests referred by the subject of the data.
- l) Provide the competent authority with information on the processing and access to the database managed.
- m) Comply with the instructions and requirements given by the competent authority. Inform the competent authority when there are violations to the security codes and there are risks in the administration of the information of the subjects.
- n) Not to use the data for purposes other than those for which they were collected, unless there is a dissociation procedure or request for a new authorization, as applicable to each country.
- o) Refrain from circulating information whose blocking has been ordered by the competent authority.
- p) Inform the subjects when there are substantial changes in THE POLICY and obtain from the subjects a new authorization when the changes are associated with the purpose of the data processing.
- q) Delete the data when they are no longer necessary for their purpose or when the term for their processing has expired, as applicable to each country.

The Procedures applicable to each country in which THE COMPANY operates and conducts its business shall establish the specific obligations corresponding to THE COMPANY.

The processing of personal data by outsourced technological means, whether complete or partial, may be contracted as long as compliance with the applicable legislation in force in each country is guaranteed. Technological means, including services, applications, infrastructure, among others, refers to those in which the processing is automatic, without human intervention.

PERSONAL DATA OF CHILDREN AND/OR MINORS

In principle, THE COMPANY will not require personal data of children or minors for the development of its processes.

Such data will be required when the law or any social and/or welfare program in favor of the STAKEHOLDERS or at the request of THE COMPANY is necessary; for which, prior collection and/or obtaining and/or consent of the personal data of children and/or minors, THE COMPANY will inform the subject and/or holder of parental authority and/or legal guardian thereof (who will exercise the powers of sufficient representation and/or sufficient capacity to exercise), regarding the optional nature in its delivery, as well as the use and processing thereof.

In this regard, THE COMPANY will ensure a special processing of the information and/or personal

data of children and/or minors, in order to ensure and protect their fundamental rights, except for those data that are of a public nature.

TRANSFER OF PERSONAL AND/OR BUSINESS DATA

The transfer to third parties of personal and/or business data, of any kind, without the authorization of the holders thereof is forbidden; unless such transfer is made to the holders themselves, assignees or legal representatives authorized for such purpose, or is made at the request of third parties authorized by the applicable legislation in force or by the competent Authorities, in the exercise of their legal functions or by court order, as well as in the other cases established by the applicable legislation in force for such purpose.

In addition, those in charge of each database must ensure that any transfer of data has the consent of the data subject, unless otherwise provided for in the applicable legislation in force.

DATABASE

The data provided by our STAKEHOLDERS will be stored in the databases owned by THE COMPANY and will be processed in accordance with the provisions of the applicable legislation in force, in order to perform the purposes set out above.

The procedures applicable to each country in which THE COMPANY operates and conducts business, as applicable, shall establish the registration of the databases maintained to date with the competent authority, which shall be updated as modifications are made thereto.

The data provided by our STAKEHOLDERS to THE COMPANY may only be known and processed by COMPANY personnel who need to know such information. These data will be treated in a loyal and lawful manner, not being used for other purposes incompatible with those specified.

MANAGEMENT AND PROCESSING OF DATABASES

The creation, access, updating, rectification, cancellation, opposition or suppression of the databases must consider:

- a) The implementation of procedures for the creation, access, updating, rectification, cancellation, opposition, elimination, suppression and transfer of databases.
- b) The prior implementation of the security measures necessary for compliance with THE POLICY, the law and its complementary regulations in force and applicable.

The collection of data and consent of the owner of such data must consider:

- a) The COMPANY's prohibition against the collection of data by fraudulent, unfair or unlawful means.
- b) The prohibition of THE COMPANY with respect to the purchase of customer and/or supplier databases.

- c) Prior to any processing of personal data, the person in charge of each database is responsible for ensuring that the consent of the subject of the personal and/or business data is obtained.
- d) Prior to the collection of data, the consent of the subject must be obtained, which must be informed, free, prior, express, voluntary and unequivocal.
- e) Such consent may be obtained verbally or in writing, as appropriate.
- f) The collection of data must be necessary and lawful in relation to the purposes determined. Likewise, the quality of the data contained in the data bank must be guaranteed, and the necessary security measures must be applied to help prevent the adulteration, loss and detour of the data.
- g) In case it is necessary to process the data of a minor, the consent of the minor's parents or guardians, as appropriate, will be required, with the exceptions provided for in the applicable legislation in force.
- h) Consent will not be required when the personal data is of a personal nature:
 - When it concerns personal data contained or intended to be contained in publicly accessible sources.
 - When there are exceptions established by the applicable legislation in force and its complementary rules.
- i) When using the digital environment, consent shall be considered to have been properly granted when "click", "pinch", "tap", "touch", "pad", or other similar means are positively provided, when a member of the STAKEHOLDER GROUP is asked for his/her acceptance of these terms applicable to the processing of his/her data.
- j) In the event of obtaining data without the prior consent of the data owner and there is no exception for the request, measures must be implemented to obtain the consent to process the data.

Any third party with whom THE COMPANY shares data information must consider and comply, as part of the current service, with the requirements of the applicable legislation in force, which must be formalized by means of a contract signed by both Parties.

CROSS-BORDER DATA FLOW

The Procedures applicable to each country in which THE COMPANY operates and conducts its business shall establish the applicable guidelines regarding the cross-border flow of data subject to processing and/or consent.

CONFIDENTIALITY OF DATA

The data provided by the STAKEHOLDERS will be processed with total confidentiality. THE COMPANY is committed to maintain professional secrecy indefinitely with respect to these and guarantees the duty to keep them by adopting all necessary security measures.

DATA SECURITY

In compliance with current applicable legislation, THE COMPANY has adopted the technical security measures appropriate to the category of data necessary to maintain the required level of security, in order to prevent alteration, loss or unauthorized access or processing that may affect the integrity, confidentiality and availability of the information.

The COMPANY has implemented all legal, technical and organizational measures necessary to ensure the security of personal data and prevent its alteration, loss and treatment and/or unauthorized access, taking into account the state of technology, the nature of the data

stored and the risks to which they are exposed, whether from human action, the physical or natural environment, as established by current legislation.

Notwithstanding the above, all information provided by our STAKEHOLDERS will be sent at their own risk. THE COMPANY recommends the utmost diligence to our STAKEHOLDERS when transferring to third parties or publishing personal information to avoid putting their data at risk, exonerating THE COMPANY from any liability in case of theft, modification, or loss of illicit data.

GUIDELINES FOR THE CONSULTATION, CREATION, ACCESS, RECTIFICATION, UPDATING, CANCELLATION, OPPOSITION, ELIMINATION, TRANSFER, SUPPRESSION AND/OR REVOCATION OF THE AUTHORIZATION AND/OR CONSENT OF THE DATA SUBJECTS

In accordance with the applicable legislation in force, data subjects have the right to access their data and the details of the processing thereof, as well as to consult them periodically, request their rectification and updating in case they present changes and/or are inaccurate, as well as to request their exclusion, opposition, cancellation, revocation and deletion when deemed appropriate, provided that the request does not violate legal or contractual obligations that the COMPANY has agreed with the subject of the data.

The Procedures applicable to each country in which THE COMPANY operates and conducts its business shall establish the applicable guidelines and mechanisms for the management of the aforementioned requests from the subjects of personal and/or business data.

It is worth noting that THE COMPANY will record the date of receipt of the request in order to continue the process.

Submission of requests

The subject of the information may consult their data free of charge whenever required. To know the personal data that are being processed by THE COMPANY, the subject may submit this, or any other request related to their data, through the channels indicated in the respective Procedures, indicating the information they wish to consult or know.

The data subject or his/her legal representatives who consider that the information contained in a database of THE COMPANY should be accessed, rectified, updated, suppressed, canceled, deleted, opposed and/or revoked, when noticing an alleged breach of any of the requirements contained in the applicable legislation in force governing THE COMPANY, may submit a claim and/or request to be received, reviewed and managed by THE COMPANY. To this end, THE COMPANY shall take into account that the aforementioned rights referred to the authorization and/or consent granted, may only be exercised by the subjects or their legal representatives, upon proof of representation.

The aforementioned request must be submitted through the means provided by THE COMPANY and must contain at least the following information:

- a) The name, address and/or e-mail address of the holder or any other means to receive the response.
- b) The documents proving the identity or authority of his representative and his capacity as representative.

- c) The clear and precise description of the data with respect to which the applicant seeks to exercise some of the rights.
- d) Physical or electronic address, where the corresponding notifications will be received.
- e) Date and signature of the applicant.
- f) Other elements or documents that facilitate the location of the data.
- g) Any other information that the applicant considers relevant for the understanding and/or management of the request.

Once the consultation or complaint procedure before the COMPANY has been exhausted, the holder or his legal representative may submit his complaint to the competent authority.

Response times and management

The Procedures applicable to each country in which THE COMPANY operates and conducts its business shall establish the applicable response times and management for the handling of the aforementioned requests from personal and/or business data subjects.

AREA RESPONSIBLE FOR THE SERVICE AND PROCESSING OF REQUESTS FOR CONSULTATIONS AND CLAIMS

The Procedures applicable to each country in which THE COMPANY operates and conducts its business shall establish the area responsible for handling requests for consultation and complaints regarding the rights of data subjects.

In the event of any non-compliance with the guidelines described in THE POLICY, whoever detects it must report it to the following e-mail address: habeasdata@confipetrol.com

DATA OF DATA PROCESSOR

The Procedures applicable to each country in which THE COMPANY operates and conducts its business shall establish the data processor with respect to personal data.

APPLICABLE FOR COLOMBIA

The responsible for the processing of requests, queries and claims where the subject may exercise his rights to know, update, rectify and delete the data and revoke the authorization, is:

- a) Responsible for personal data: Confipetrol S.A.S.
- b) Process: Compliance - Personal Data Processing Officer is in charge of the Personal Data protection function.
- c) Address and telephone: Carrera 15 # 98 -26 and telephone 4232949 in Bogota - Colombia.
- d) E-mail address: habeasdata@confipetrol.com

POLICY UPDATE

THE COMPANY commits and guarantees that THE POLICY will be kept up to date, according to the development and operation of THE COMPANY's business. The periodicity for its review, update or approval shall be on an annual basis, or when significant changes occur in internal procedures or in the applicable legislation in force.

Each update of THE POLICY shall be accompanied by the respective notification and training of those obliged to comply with it and to know it.

POLICY EFFECTIVE DATE AND DATABASE VALIDITY PERIOD

THE POLICY shall become effective as of its publication.

The validity of the databases will be the reasonable and necessary time to fulfill the purposes of the Processing.

EXCEPTIONS AND PENALTIES

Consideration must be given to:

- a) Any exception to compliance with THE POLICY must be notified to the person appointed in the Procedure applicable to each country in which THE COMPANY operates and conducts business, for registration and evaluation.
- b) Failure to comply with THE POLICY will be considered a serious offense and will be sanctioned as such, according to the internal work regulations applicable to THE COMPANY.

Note: THE POLICY must be read in conjunction with the applicable procedure for the processing of personal data in each country.

Oscar Jeovanny Fernandez Moreno
OSCAR JEOVANNY FERNANDEZ MORENO.
President and Legal Representative

CORPORATE CODE OF ETHICS

AIM

The aim of our code of ethics is to define the legal and regulatory framework and guidelines under which **CONFIPETROL** acts hereinafter (the Company¹). In order to generate an organizational culture based on principles, ethical values as a fundamental axis to generate transparent relationships, as well as the confidential processing of information, ethical, moral and criminal responsibilities that cover the intellectual property of the Company's information and under which the business is defined, and the activities are executed.

Our code of ethics focuses on healthy, transparent competition and participation in businesses that are within the legal framework, which cover the applicable national and international laws in force in the countries where we operate. Above business is the name and reputation of the Company, which is achieved with ethics and transparency in business, in the execution of any activity by our employees and our stakeholders. The Company recognizes the governmental bodies responsible for security and the management of social conflicts in the countries where we operate, including corruption, extortion, kidnapping, bribery, fraud, drug trafficking, human rights, money laundering and financing of terrorism.

The Company will report to the competent authorities with honesty and transparency anything that may violate the Corporate Code of Ethics.

APPLICATION

This Corporate Code of Ethics shall be adopted and fully complied with in a responsible manner by all employees of the Company and in all countries where we operate. This Code extends to the Corporate Governance, advisors and consultants, customers, suppliers, contractors, communities, allied companies and other stakeholders. They shall apply the provisions of this document in their behavior and decisions.

DEFINITIONS

1. **Corruption:** whoever directly or through an intermediary promise, offers or grants to directors, administrators, employees or advisors of a company, association or foundation a gift or any unjustified benefit to favor him or a third party. Obtaining a particular benefit by action or omission, improper use of a position or power, or of resources or information.
2. **Gift:** any item, object or thing that is given, received or offered free of charge, such as a present, gift, donation, gratuity or alms.
3. **Due Diligence:** performing something with sufficient care to reduce the possibility of being found negligent and incurring administrative, civil or criminal liability.
4. **Extortion:** a crime consisting of forcing a person, through the use of violence or intimidation, to perform or omit to perform a legal act or business for profit and with the intention of causing damage to the assets or property of the passive subject.
5. **FCPA:** Foreign Corrupt Practices Act, the FCPA is a law that prohibits U.S. companies or any of their subsidiaries, regardless of where their operations and employees are located, from directly or

¹ For all purposes of this code, the Company shall be understood as Confipetrol S.A.S., the consortiums in which it participates, its subsidiaries and branches in other countries.

indirectly facilitating bribery of foreign public officials in order to benefit from this action. Failure to comply can result in severe penalties ranging from fines to placement under supervision or court-ordered liquidation.

6. **Financing of Terrorism:** A crime committed by any person who directly or indirectly provides, collects, delivers, receives, administers, contributes, safeguards or stores funds, goods or resources, or performs any other act that promotes, organizes, supports, maintains, finances or economically sustains illegal armed groups or their members.
7. **Fraud:** any action committed intentionally to obtain illicit gains or illegally to the detriment of the interests of the entity or a third party.
8. **Corporate Governance:** Set of principles and rules that regulate the design, integration and operation of the organization's governing bodies. It consists of maintaining a balance between economic and social objectives, between individual and community objectives.
9. **Money laundering:** acquiring, safeguarding, investing, transporting, transforming, storing, conserving, keeping, guarding or administering assets originating from illicit activities.
10. **Drug trafficking:** illegal trade in toxic drugs in large quantities. The process (starting with the cultivation of the substances, followed by production and ending with distribution and sale) is usually carried out by various illicit organizations (called cartels) that specialize in different parts of the chain.
11. **Global Compact:** is a voluntary initiative, in which companies commit to align their strategies and operations with ten universally accepted principles in four thematic areas.
12. **SAGRLAFT:** System for Self-Control and Risk Management of Money Laundering and Terrorist Financing, which aims to prevent the introduction into the financial system of resources originating from activities related to money laundering and/or terrorist financing, as well as to detect and report operations that are intended to be carried out or have been carried out, in an attempt to give the appearance of legality to operations related to ML/FT.
13. **Kidnapping:** to deprive an individual of his liberty illegally in order to demand something in exchange for his release; to take by force a means of transport; to make the distribution of a product judicially impossible; or to seize an asset by judicial means.
14. **Bribery:** an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as a means of inducing something dishonest or illegal to be done in the conduct of the management of an enterprise.
15. **Impersonation:** action of replacing a person or thing.
16. **Transparency:** detailed knowledge of the decisions, resolutions and regulations taken by the organization regarding its activities and projects, in order to provide truthful, verifiable and auditable information on real costs, on the management of funds, on the dangers and implications that may arise, on security aspects and on the mechanisms in place for access to information.

Principles of the Global Compact: The Company has adhered to the Global Compact since 2013, and is committed to 10 principles:

Human Rights:

Principle 1: Businesses should support and respect the protection of universally recognized human rights within their scope of influence.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

Labor:

Principle 3: Businesses should respect freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labor.

Principle 5: Businesses should support the effective abolition of child labor.

Principle 6: Businesses should uphold the abolition of discrimination in respect of employment and occupation.

Environment:

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should encourage initiatives that promote greater environmental responsibility.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anticorruption:

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

LEGAL FRAMEWORK AND REQUIREMENTS SUBSCRIBED BY THE ORGANIZATION

- Laws in force applicable to the Company
- Matrix of legal and other requirements subscribed by the organization.
- Corporate policies and guidelines
- Customer policies and regulations
- Technical specifications and contracts
- IMS procedures and documentation
- Global Compact principles and guidelines
- Environmental regulations
- Industrial hygiene and safety regulations.

FUNDAMENTALS OF THE CODE OF ETHICS

PRINCIPLES:

Teamwork: in the Company, all the people in the team contribute with our capabilities to complement and strengthen the capabilities of the work team, focused on meeting the objectives and goals assigned to our work group, aligned with the principles, objectives and policies of the Company, being equally responsible for the success or failure of the team, who does not add up in the team should not be in the team, all plans and programs of the team are developed in a harmonious and integrated manner by the different members of the team, sharing responsibilities, working in coordination and aiming at the same goal without individual or personal protagonism.

Effective communication at all levels: In the Company, communications transmit and reinforce the values and principles that support our corporate culture, our corporate governance follows up on management and control through process committees bidirectionally at all levels, through internal communications, through our website, through our HSEQ manual, through meetings, through our policies, through our regulations, through reports and briefings. All members of the organization are obliged to ensure the application and dissemination of updated and current information, using the means described above.

Compliance with the law: at the Company, we will always conduct all our activities within the current and applicable legislation.

No harassment or discrimination: all persons of legal age without distinction of race, religion or culture have the option without discrimination to participate in the personnel selection processes according to profiles and requirements for each position, all our employees will earn legal and contractual salaries when subscribed by the organization, have the right to be affiliated to a health insurance company, to an occupational risk insurance company, to a pension fund, to a severance fund, to a family compensation fund and/or the minimum mechanisms established in each country of operation, to a family compensation fund and/or the minimum mechanisms established in each country of operations. Our personnel have the right to receive the necessary equipment, personal protection elements and training in health, safety and environment to avoid and prevent accidents and occupational illnesses.

VALUES:

Occupational health and safety: We promote a culture of self-care among our employees to reinforce safe behaviors and reduce or eliminate those that cause risks, through the following actions:

1. Reporting of unsafe failures or control failures
2. Industrial safety best practices
3. Identification of hazards and impacts
4. Training and improvement of our personnel's competencies.
5. Implementation of management programs to prevent and minimize risks in our operations.

Honesty: we are obliged to apply this human quality, behaving and expressing ourselves with coherence and sincerity (being honest), in accordance with the principles and values of truth and justice. We promote respect for truth in relation to the world, facts and people; in another sense, honesty also implies the relationship between us and the environment where we develop our work or live.

Justice: Justice is the conception that each member of the organization must work fairly and for the common good. It is a principle that determines a balance in our work environment; we must maintain harmony among our collaborators at all levels.

Responsibility: Responsibility is a value that must be always in the conscience of the individual, allowing him to reflect, manage, guide and assess the consequences of his actions, always at the moral level. Once it passes to the ethical level (implementation), these seven ideas must persist in the Company's collaborators to establish the magnitude of such actions and face them in a positive and integral way, always in favor of the labor, social, cultural, and natural improvement:

1. Recognize and respond to one's own and others' concerns.
2. Improve without limits the performance over time and the resources of the position one holds.
3. Timely reporting of anomalies that are generated voluntarily or involuntarily.
4. Plan in a timely manner the different actions that make up a general activity.
5. To assume the consequences that the omissions, works, expressions and feelings that generate in the person, the environment, the life of others and the resources assigned to the position conferred with the position with prestige.
6. Promote healthy principles and practices to produce, handle and use the tools and materials conferred to the position.
7. Disseminate.

Awareness: Awareness within the organization and administration of the Company's Asset Management strategy is related to the fact that people internalize the importance of risk control, self-care in the performance of their work, commitment to their own safety and that of others, the relevance of their actions and behavior in the proper management of physical assets and their optimization. It is also essential that people show in their daily lives their conviction to continuously improve, as human beings, in their work and the benefits that this represents at an individual and organizational level.

Abnegation: We all voluntarily renounce social alienation: alcohol, drugs, vices, libertine inclinations and disorderly activities, aiming first and foremost to fulfill the responsibility assigned to us in our work and to correspond to the trust placed in us as professionals in what we do.

Respect: we align ourselves with compliance with the law, promote harmony with the environment, and recognize the importance of human rights, freedom of religion and freedom of expression.

Transparency: our ethical principles focus on healthy, transparent competition and participation in businesses that are framed within the current and applicable legislation of each country where we operate. Our company will always act under the transparency and ethics in business, no member of the Company may receive or offer anyone economic gifts, in kind or of any other kind to obtain or award any business.

ETHICAL GUIDELINES FOR STAKEHOLDERS

The Company is aware of the impact of its decisions and activities on society and the environment. Consequently, the Corporate Code of Ethics includes criteria that guide the Company's actions and decisions with respect to stakeholders.

Relationship with collaborators

The Company has a work team committed to the objectives and strategies of the organization, which develops its activities in an effective and proactive manner, with the appropriate means, in a safe environment. Employees will act in a manner consistent with the provisions of the corporate code of ethics.

Relationship with shareholders and allies

Equality: shareholders and allies will receive the same treatment, regardless of the amount and/or value of their shares and/or established alliance.

Provision of information: shareholders and allies will receive relevant information to guide their decision-making process regarding their investment and/or alliance and to promote a competent and conscientious participation. In addition, shareholders have the right to the process of accountability by the Company, without this compromising and/or representing risks for the continuity of the business or affecting third parties.

Relationship with authorities

Compliance with legislation: The Company respects and complies with all legal precepts and regulations in force under the limits established in the legal system. Services intended to be provided to governmental entities shall be governed by the applicable laws of each country, as applicable.

Timely response: timely response to requests made by the authorities.

Relationship: Relations with institutional interlocutors are carried out solely and exclusively by the Company's officers who have been appointed by the Chairman's Office for this purpose; as well as relations based on cooperation and transparency.

Relationship with suppliers and contractors

The Company recognizes its suppliers and contractors as strategic allies to enhance productivity, competitiveness, contribution to sustainable development and generating value for both parties and for the community in general. The relationship is based on transparency, legality, equity and mutual respect. The corporate values, the Corporate Code of Ethics and other policies are extended to the value chain of suppliers and contractors.

Gifts and presents: Company officers cannot give or receive or accept gifts, presents or benefits, in cash or in kind, or invitations from public or private officials that may be interpreted as favors that generate private benefits.

Impartiality: The contracting and/or bidding processes carried out by the Company are based on equal opportunities, transparency and fairness. In this sense, the Company prohibits its employees from charging (and/or receiving) directly or through third parties' commissions, incentives or similar in cash or in kind to suppliers and contractors for their personal benefit.

Relationship with the community

The Company will ensure the maintenance of harmonious relations with the communities in the area of influence where it operates, based on mutual respect, consultation and participation. In addition to its corporate business objectives, the Company, as part of its social responsibility, is committed to:

- Being a good neighbor and responsible corporate citizen.
- Being respectful of the cultural values and traditions of the population.
- Maintaining permanent communication channels between the Company and the community.
- Consulting with the communities to provide equitable local employment opportunities for unskilled labor.
- Reviewing with the community the opportunities for qualified technical and professional labor, which, under conditions of equality in the fulfillment of profiles and requirements, will have a preferential option.
- Applying a preferential local procurement and contracting policy for the benefit of the population in the area of influence, within parameters of technical, economic and social viability.
- Inducting and monitoring employees and contractors so that they maintain the corporate guidelines with the community and those defined contractually.
- Coordinating with the communities and local authorities to minimize possible inconveniences caused by the execution of our activities.

Relationship with customers.

It is a relationship based on transparency, respect and responsiveness that allows the customer to find in the Company its allied company. Communication must be clear, transparent, balanced and timely.

Quality and timeliness of service: Provision of a service with operational excellence, under standards of prestige and innovation, and high performance oriented to the satisfaction of our customers.

Added value: seeking the trust and well-being of our clients, the Company offers value-added services that exceed their expectations.

Provision of information: The Company will provide its customers with clear, accurate, truthful and transparent information.

STATEMENTS:

The Company and all its employees are obliged to:

- Not to accept or request personally or through another person, financial or in-kind gifts, favors or privileges of any kind or any other compensation to expedite a procedure, assign a contract or provide information.
- Always act with transparency and ethics in business.
- Always act in accordance with legal and/or contractual actions as appropriate.
- Never give in to pressure from illegal groups. Our obligation is to denounce any anomalies that may arise and not to provide any type of support.
- Not to carry out private or third-party work (without prior authorization from the Legal Representation), which competes with the scope to which our Company is dedicated and less for what they were hired for, the contrary to the above leads to a conflict of interest, which will be claimed civilly and criminally as the case may merit.
- Proper management of the Company's and customers' assets, monies, facilities, etc.
- Not to generate immoral and unethical activities.
- The processing of Company information such as procedures, formats, personnel data, salaries, contract data, equipment data, calibration data, financial information, developments, technical information, project information, marketing information, legal information, IMS information, minutes of assemblies and meetings and in general any type of information relevant to the Company or any information from customers and other stakeholders that we are given in custody for the use of the contracts we execute, is confidential and must be handled internally exclusively. In the event that any employee acts unethically and shares information to competitors or third parties, he/she shall be subject to internal administrative and disciplinary measures, in addition to responding to legal actions that the Company will institute in the given case.
- Not to remove any information or assets of the Company or of any client to whom we provide services without the authorization of the area manager or any member of the strategic committee, and even less to transmit it to third parties.
- Forward to the legal representative requests for information required by third parties not employed by the Company.
- When required by the Company, submit the current judicial certificate or other equivalent documents according to each country, while working for the Company.
- Do not pass on responsibilities to the Company for employees' personal business, such as personal loans of money or any activity involving securities, such matters are the responsibility of each employee, we recommend not to lend money, jewelry, securities, or other belongings.
- Preventing injury, slander and negligence have criminal liability, it is the Company's policy to take care of the good name and image of the company, customers, suppliers and employees. For this reason, the use of the name, logo and corporate image must follow the parameters of the identity manual and/or be authorized in advance by the Executive Committee or the business development process (marketing).
- Adopt and promote the declaration of human rights and the 10 principles of the Global Compact.
- Ensure the maintenance of harmonious relations with the communities in the area of influence where it carries out its activities on the basis of mutual respect, consensus and participation.
- Complete the voluntary declaration of origin of funds form. This requirement extends to suppliers and contractors.
- Respect freedom of association and the right to collective bargaining.
- Disseminate the Corporate Code of Ethics and comply with it, answering for the legal consequences of non-compliance.

CONFLICTS OF INTEREST

A conflict of interest is considered to exist when personal and private interests go against the interests of **CONFIPETROL**, making it difficult to make objective decisions for the benefit of the Company.

Services rendered or work performed must never result in personal or family benefits or advantages.

All employees must fill out the Conflict-of-Interest Declaration form regarding:

- Degree of consanguinity and affinity of family members working in the organization.
- Provision of any type of services to the company.
- State whether he/she has shares and/or participation in companies.
- Declare to which other companies or third parties they provide services or consultancy services.

All conflicts of interest must be reported to the Compliance Officer. Having a conflict of interest does not necessarily mean a violation of the Corporate Code of Ethics, but not reporting such a conflict of interest does.

CONFIDENTIALITY

Employees are required to know, sign and abide by the stipulations of the confidentiality agreement form. The purpose of which is to ensure that employees will not disclose, divulge or provide to any natural or legal, private or public person any information of the Company, and will not use for their own benefit or for the benefit of any other natural or legal, public or private person, any information related to the performance of their duties, as well as the policies and/or any other information related to their duties and/or the Company's line of business. This form must be submitted to the compliance officer.

ANTICORRUPTION

Confipetrol has guidelines for prevention, detection and response to all those acts that violate the Corporate Code of Ethics, truth and transparency of processes, being a tool to eradicate corruption practices, such as bribery and extortion. The Company:

- Does not tolerate fraud and corruption.
- Implements actions to prevent and react to possible situations of fraud and corruption.
- Promotes a scenario of transparency, integrating the different systems developed for the prevention and detection of fraud and corruption.
- Promotes a culture based on the principle of "zero tolerance" for fraud and corruption.
- Has adequate procedures for the prevention, detection and treatment of fraud and corruption, aiming for continuous improvement.
- Emphasizes proactive activities, such as prevention and detection, as opposed to reactive activities, such as investigation and punishment.
- Reports to the compliance officer any suspected acts of fraud or corruption.

EXTORTION AND BRIBERY

If any employee is being subjected to extortion or bribery in his or her work environment, he or she must immediately report it to the compliance and integral protection area. Likewise, when a case is known of a third person in the company who is being subjected to some kind of extortion and/or bribery, the following must be reported immediately to the Compliance and Integral Protection area.

Any form of illicit payment with the purpose of obtaining advantages in the relations with the different stakeholders is also prohibited. Likewise, the prohibition covers officials who, by reason of their functions and activities, intend to accept or offer bribes to obtain their own benefits.

The U.S. Foreign Corrupt Practices Act (FCPA) makes it illegal to bribe foreign government officials to obtain or retain business.

PRESENTS

The Company does not grant or admit any type of gift that may be interpreted as a behavior that exceeds the business relationship, under no circumstances are cash gifts allowed.

The gifts granted by the Company comply with the conditions established in the Gifts, Corporate Attentions and Courtesies Policy, which may be consulted on the Company's website.

HOSPITALITY

Hospitality offered by the Company is solely and exclusively in connection with the Company's business and is offered in good faith and only in connection with a promotion, explanation, demonstration, site visit. Excessive expenditure on alcohol or any expenditure on lewd entertainment is prohibited.

TRAVEL

The Company has a procedure that regulates the process for travel authorization, travel support measures procedure and expense reimbursement procedure for both employees and third parties in the service of the organization. Travel shall be solely and exclusively for work purposes. However, some mobilizations may be considered when it corresponds to situations of common illness or work accident that merits priority attention and accompaniment of the affected person.

DONATIONS

The Company has policies and procedures that regulate donations to the communities in the area of influence where it operates. In addition to the alignment of these with the principles of the global compact, as well as practices of good relationship with the environment, continuity of operations and mitigation of risks and impacts due to situations that may alter the normal development of the operation.

Donations made to charitable organizations established abroad are permitted, provided that all donations made by the Company to foreign charitable organizations are permissible under the FCPA and local laws, previously approved by the compliance officer and under the principles of due diligence.

SPONSORSHIPS

Sponsorships made by the Company are carried out under the direction of the business development (marketing) process, which determines the relevance of the sponsorship. In addition to following the regular conduit of the purchasing process and compliance officer. Sponsorships are carried out with the purpose of advertising, positioning of the Company and relationship with potential customers, as well as the influx of people and/or companies interested in the Company's services. Participation is usually in fairs, congresses, conventions, expositions, training events on technical and international topics, sporting events, and other events.

ADVANCED DUE DILIGENCE

Refers to the previous concept but with a higher level of care, diligence, and investigation. The Company promotes the application of due diligence with the purpose of:

- Preventing events

- Preparing for the crisis
- Reporting or denouncing.
- Compliance with laws

BOOKS AND RECORDS.

The Company guarantees the integrity, sufficiency and timeliness of the accounting records and books, financial information, reports to external entities (financial statements and other financial information) and interim financial reports for use within the Company (Presidency, executive team and members of the Board of Directors). All year-end or interim external or internal accounting reports must be in compliance with the Accounting Policies adopted by the Company and the IFRS in force.

We reaffirm our commitment not to conceal, distort information, make unauthorized transactions and/or create secret accounts or omit records.

Any attempt to defraud accounting records and/or financial information will be considered a serious breach of the Corporate Code of Ethics and will be reported to the appropriate entities for disciplinary action.

COMPLAINTS, QUESTIONS OR SUGGESTIONS

- E-mail: Colombia and other countries where the Company operates - etica@confipetrol.com
Peru - etica@confipetrol.pe
- External control and reporting entities present in each country, such as those listed below, specific to Colombia.
Gaula (Group of Unified Action for Personal Liberty)
Prosecutor's Office
Attorney General's Office
National Police
País Libre Foundation
National Army, among others and as appropriate or applicable

REGULATORY AND CONTROL MECHANISMS

- Internal Labor Regulations
- Procedure for discharge
- Decision Committee
- Audit, Ethics and Compliance Committee
- External regulatory bodies.

DDISSEMINATION OF THE CODE OF ETHICS

The Corporate Code of Ethics shall be adopted, recognized and disclosed to the Company's employees, suppliers, customers, associates and other stakeholders.

The Company shall communicate and disseminate the contents of the Corporate Code of Ethics to its employees through different means, including the induction and re-induction process.

AGREEMENT

I agree to comply with, promote, disseminate and enforce the Company's Corporate Code of Ethics within our organization and to extend it to other stakeholders with whom we interact.

SANCTIONS

Failure to comply with this Code is considered a serious offense and will be sanctioned in accordance with the sanctions matrix which is an integral part of the discharge procedure. In addition to being reported to the authorities and prosecuted in accordance with the applicable laws in force in the country where the operations are conducted.

Oscar Jeovanny Fernandez Moreno

OSCAR JEOVANNY FERNANDEZ MORENO.

President and Legal Representative

COMPLIANCE POLICY

INTRODUCTION

The **COMPLIANCE POLICY** (hereinafter the “**POLICY**”) establishes the tone of the management against the rejection of practices related to the crimes of **MONEY LAUNDERING, FINANCING OF TERRORISM, FRAUD AND CORRUPTION** (in all its forms, including but not limited to: Bribery, transnational bribery, generic active bribery, specific active bribery, influence peddling, simple and aggravated collusion) and its commitment to activities revolving around ethics, transparency, and honesty. In turn, it reinforces compliance with legal, contractual and/or regulatory requirements, issued for the prevention of these practices in the countries where **CONFIPETROL**¹ operate.

This **POLICY** is fundamental in the direction of **CONFIPETROL**'s Risk Management and Prevention System and its ethical commitments; in this sense, it complements the guidelines established in the Code of Business Ethics and the other **CONFIPETROL** policies that are part of the System; allowing to reflect a commitment so that all its processes and relationships are executed with transparency and reliability and, in turn, to strengthen the mechanisms of identification, evaluation and control of risks that may arise from the System by virtue of the continuity of the business and to maintain its prestige.

SCOPE AND RECIPIENTS

This **POLICY** is targeted to all associates, employees, suppliers, customers, communities, PEPs², representatives, public servants and other persons who are or become part directly or indirectly of the stakeholders and third parties acting on behalf of **CONFIPETROL** (who together shall be referred to as the “**RECIPIENTS**”); who shall also comply with all terms, procedures and guidelines established by law and all applicable regulations in force in the countries where **CONFIPETROL** has operations and in reference to the offenses mentioned throughout the **POLICY**, where situations that may become a threat to the operation and good name of the Company are evident.

NON-ADMITTED PRACTICES

CONFIPETROL does not admit that the **RECIPIENTS** practice or encourage, directly or indirectly, the development of conducts, such as:

- Offering or promising money, profit, benefit, facilitation payment³ or any promise of remuneration or otherwise, directly or indirectly, to delay or omit an act proper to the position or role, or to perform an act contrary to the duties of the **RECIPIENTS**.
- Request or receive money, profit, benefit, facilitation payment or any remuneration promise or not, directly or indirectly, from the **RECIPIENTS**, to obtain in exchange the participation, celebration, facilitation, closing of a business deal, awarding of a contract or in general any management related to favoring a contracting, business or process of any kind.

¹ For all purposes of this **POLICY**, **CONFIPETROL** shall be defined as the Company in the countries where it operates, its consortiums, consortium companies, affiliates, subsidiaries, branches or any company or entity where it has participation now or in the future.

² PEPs - Publicly Exposed Persons. These are individuals who have been entrusted with prominent public functions, such as Heads of State or Government, high-level politicians, high-level government or judicial officials or high-ranking military officers, high-level executives of state corporations, officials of major political parties. Financial Action Task Force (FATF).

³ These are unofficial and improper payments in cash or in kind that are given in exchange for ensuring or expediting the course of a procedure, in which the person making the payment (which may be small) has a preferential right to something. This type of payments violate the legality and expose **CONFIPETROL** to sanctions and/or its administrators to criminal proceedings in accordance with the current regulations of each country.

- Unduly using, for personal gain or for the benefit of others, influences derived from the exercise of one's position, role or that allow one to act as an intermediary in order to obtain any personal benefit or benefit for third parties and/or to cover up an illegal situation or a situation that involves one in an ethical dilemma.
- Inducing, influencing, assisting, allowing or favoring the **RECIPIENTS**, in the commission of any conduct of **MONEY LAUNDERING, FINANCING OF TERRORISM, FRAUD** and/or **CORRUPTION** in all its forms, in the countries where **CONFIPETROL** operates.
- Using funds, resources, assets or personnel of **CONFIPETROL** for any illegal, improper, illicit or unethical purpose or for any purpose intended to cause damage to the corporation, the Company or other parties.
- Not reporting gifts received in accordance with **CONFIPETROL's "POLICY OF GIFTS, CORPORATE ATTENTIONS AND COURTESIES"**.
- Omitting or delaying the completion of the Report of Intended or Unusual Transactions to **CONFIPETROL**, with respect to any practice of **MONEY LAUNDERING, FINANCING OF TERRORISM, FRAUD** and/or **CORRUPTION** in all its forms, known by any means.
- Acting in contravention of the Code of Business Ethics, the Work Regulations and/or the Policies for the prevention of **MONEY LAUNDERING, FINANCING OF TERRORISM, FRAUD AND CORRUPTION** in all its forms.

CONTROL MECHANISMS

CONFIPETROL establishes control mechanisms to prevent situations that may directly or indirectly become practices of **MONEY LAUNDERING, TERRORISM FINANCING, FRAUD** and/or **CORRUPTION** in all its forms. Some of them are:

- The **RECIPIENTS** having a relationship or link with **CONFIPETROL**, make a voluntary declaration on the origin of their funds or resources, with the purpose of certifying that their origin is legal.
- The **RECIPIENTS** who have labor or commercial relationship or participation with **CONFIPETROL**, are committed to keep confidential the privileged or confidential information of the Company, to protect their *know-how* and interests.
- **CONFIPETROL** employees who are involved in a real or presumed conflict of interest situation shall fill out the employee conflict of interest declaration form. For the other **RECIPIENTS**, the request for declaration is extended, if there are doubts or suspicions regarding conflict-of-interest situations.
- **CONFIPETROL** shall refrain from making cash transactions; if exceptions other than petty cash arise, such payments must be approved by a higher authority and reported to the Company's Compliance Officer.
- **CONFIPETROL** has implemented procedures to identify its employees, suppliers and customers through the application of due diligence measures in their knowledge, recording their basic data, identifying people considered higher risk in the formalization of commercial and contractual relationships, such as PEP's and foreign persons not domiciled or with criminal records and/or related in binding lists that may jeopardize the reputation of our organization.
- **CONFIPETROL** will limit the linkage or establishment of relationships with natural and/or legal persons that appear within restrictive binding lists in the countries where **CONFIPETROL** has operations and in turn will disassociate the **RECIPIENTS** it identifies as reported in the monitoring process; except when control authorities require that the link or relationship be maintained or when the life and integrity of a **RECIPIENT** may be at risk.
- **CONFIPETROL** will report directly to the entity (in the country where it is identified) in charge of centralizing, systematizing, and analyzing data related to operations of **MONEY LAUNDERING, FINANCING OF TERRORISM and/or CORRUPTION** in all its forms; suspicious operations related to these crimes.

- **CONFIPETROL** periodically informs, discloses and/or trains its **RECIPIENTS** on the guidelines established in its **POLICY OF GIFTS, CORPORATE ATTENTIONS AND COURTESIES**.
- **CONFIPETROL** has no particular ideological, political or partisan affiliation; it respects the political and religious ideology of each employee, which will be entirely personal and may not include contributions of time, financial support and resources belonging to the Company.
- **CONFIPETROL** is committed to directing actions to comply with Principle 10 of the Global Compact "Businesses should work against corruption in all its forms, including extortion and bribery", by adhering to this initiative.

Failure to comply with the guidelines established in the **POLICY** will lead to the implementation of disciplinary or administrative measures, depending on the link or relationship that the **RECIPIENT** has with **CONFIPETROL**. In any case, the actions will be taken in accordance with the provisions of the regulations, corporate policies, documented information of the system, laws and applicable regulations in force in the country where the non-compliance originates.

Furthermore, it is the duty of all **RECIPIENTS** to report any malicious proposal, illicit act, conduct that affects or may affect **CONFIPETROL**'s reputation, criminal practice and in general any attempted or unusual operation related to **MONEY LAUNDERING, TERRORISM FINANCING, FRAUD** and/or **CORRUPTION** practices in all its forms, through the following e-mail addresses:

- Colombia and other countries where the Company operate - etica@confipetrol.com
- Peru - etica@confipetrol.pe

CONFIPETROL ensures that the reports associated with malicious practices and/or crimes reported, will be treated with full confidentiality and anonymously if so requested by the person making the report. It also ensures that any **RECIPIENT** who reports in good faith, a practice of **MONEY LAUNDERING, FINANCING OF TERRORISM, FRAUD and/or CORRUPTION** in all its forms, will not suffer any consequences from the Company in terms of its commercial, labor or other relationship as appropriate. Externally, **CONFIPETROL** promotes with all its **RECIPIENTS** the filing of complaints in the instances and/or surveillance and/or control entities, if negative deviations are identified, as appropriate.

This **POLICY** unifies the guidelines established in GG-GEN1-PO-18 ANTI-BRIBERY AND ANTI-CORRUPTION POLICY and the MANAGEMENT POLICIES OF THE MONEY LAUNDERING AND TERRORISM FINANCING (ML/FT) RISK MANAGEMENT SYSTEM GG-GEN1-PO-20 and, in turn, replaces them.

Oscar Jeovanny Fernandez Moreno

OSCAR JOEVANNY FERNANDEZ MORENO
President and Legal Representative

CONFLICT OF INTEREST POLICY

INTRODUCTION

With the purpose of strengthening the organizational culture based on principles, values and transparent relationships, this **CONFLICTS OF INTEREST POLICY** (hereinafter the "**POLICY**") is implemented to reaffirm the "Tone at the top¹" regarding the declaration and/or reporting of conflicts of interest situations by employees, personnel in the process of selection (candidates), legal representatives, partners, shareholders, members of the Board of Directors, suppliers, customers and communities of **CONFIPETROL** (who together shall be referred to as the "**RECIPIENTS**"); who also must adhere to all the guidelines that this **POLICY** establishes.

For **CONFIPETROL**, a conflict of interest is a situation that arises when there is a link, relationship and/or participation between the **RECIPIENTS**, legal entities and/or natural persons within the Company or outside it, which may affect the objectivity and independence of those involved in a real or apparent way in the decision making process, in the execution of actions or in the development of the work that may lead to personal or third parties' favoring, directly or indirectly.

The application of this **POLICY seeks** to strengthen the principle of transparency during the performance of functions and/or decision making of the **RECIPIENTS** and where the interests of **CONFIPETROL** always prevail.

TYPES OF CONFLICTS OF INTEREST

CONFIPETROL has established the following types of conflicts of interest that may arise, which are described in greater detail in **CONFIPETROL's** "Procedure for the Management of Conflicts of Interest":

- **TYPE I:** It occurs when employees, personnel in the selection process (candidates), legal representatives, partners, shareholders and/or members of the Board of Directors of **CONFIPETROL**, have any relationship up to the fourth degree of consanguinity, second degree of affinity and/or family relationship with **CONFIPETROL** employees; or, when their spouses, permanent partners, cohabitants and/or those with whom they have an affective relationship, also work for **CONFIPETROL**.
- **TYPE II:** Refers to all cases in which the spouse, permanent partner, cohabitant, person with whom an employee, personnel in the selection process (candidates), legal representatives, partners, shareholders and/or members of the Board of Directors of **CONFIPETROL** maintain an affective relationship and/or have a kinship relationship up to fourth degree of consanguinity, second degree of affinity and/or family type and at the same time work or have some type of participation with suppliers, customers and/or competitors of **CONFIPETROL**.
- **TYPE III:** It occurs when an employee, personnel in selection process (candidates), legal representatives, partners, shareholders and/or members of the Board of Directors of **CONFIPETROL**, offer goods or provide services to third party companies, participate in them as legal representatives, partners, shareholders and/or members of the Board of Directors or provide services to **CONFIPETROL** not related to their functions and/or the role for which they were hired in **CONFIPETROL**.

¹ Management tone or Top management commitment

- TYPE IV²: It occurs when an employee, personnel in the selection process (candidates), legal representatives, partners, shareholders and/or members of the Board of Directors of **CONFIPETROL**, cohabit³ with any of the **RECIPIENTS** and/or with competitors of **CONFIPETROL**.

DISCLOSURE, REPORTING AND ANALYSIS

The Code of Business Ethics, the procedure for handling conflicts of interest, this **POLICY** and other guidelines established within **CONFIPETROL**, establish that it is the responsibility of the **RECIPIENTS** in good faith and respecting their right to privacy, to immediately disclose their conflicts of interest and report those identified within **CONFIPETROL**. The declaration and/or report must be attached and/or sent to the following e-mails, or to the official assigned for this activity:

- Colombia, Bolivia, Argentina and Chile: vp.controlinternoycumplimiento@confipetrol.com and/or etica@confipetrol.com
- Peru: etica@confipetrol.pe

CONFIPETROL periodically requests its **RECIPIENTS** to fill out and/or update their conflicts of interest or to confirm the absence of any of them. This request is made taking into account the criticality of the positions and/or roles of the **RECIPIENTS**, the requirements governing **CONFIPETROL** and/or the needs of the operation. In all cases, the Compliance Office must evaluate the level of risk and criticality of the situations presented in such a way that the corresponding decisions are taken and in certain cases the respective controls are implemented so that the interests of **CONFIPETROL** prevail.

The presentation of a conflict of interest should not become an obstacle to comply with the guidelines established by **CONFIPETROL** regarding the handling of confidential information, intellectual property and *know-how* of **CONFIPETROL**. Nor become a mechanism that facilitates the generation of alliances, the creation of companies and the offering of services using confidential information of **CONFIPETROL** for this purpose.

NON-COMPLIANCE

Failure to comply with the above will lead to the application of sanctions and/or decision making in accordance with the provisions of the Labor Regulations, procedures and other **CONFIPETROL** policies.

DISSEMINATION AND COMMUNICATION

This policy is available on **CONFIPETROL**'s web page.

Oscar Jeovanny Fernandez Moreno
OSCAR JEOVANNY FERNANDEZ MORENO
President and Legal Representative

² This typology applies to Colombia.

³ Living with another person, without necessarily being related, being spouses, permanent partners, cohabitants and/or having an affective relationship with each other.

GIFTS, CORPORATE HOSPITALITY AND COURTESIES POLICY

INTRODUCTION

The **GIFT POLICY** (hereinafter the "**POLICY**") establishes the corporate guidelines regarding the reception and delivery of legitimate gifts in the strengthening of commercial relations between **CONFIPETROL**¹ and its stakeholders and in its brand recall processes (*Top of Mind*).

SCOPE

This **POLICY** defines the guidelines for handling gifts, contemplating: Sponsorships, hospitality, brand recall items, philanthropic contributions, donations, hospitality, sponsorships and similar items.

This **POLICY** is addressed to all partners, shareholders, employees, suppliers, customers, communities and other persons who are or become direct or indirect stakeholders of **CONFIPETROL** (who together will be referred to as the "**RECIPIENTS**"); who must also adhere to all the guidelines established in this **POLICY**.

CRITERIA FOR ACCEPTANCE AND DELIVERY OF GIFTS

The following aspects must be considered for **CONFIPETROL** employees to be able to accept and/or deliver a gift to/from **RECIPIENTS**:

- The intentionality of the gift should be associated with strengthening the business relationship. It should not be associated with generating personal ties.
- The gift must be delivered and/or received in good faith by the giver.
- Receiving or delivering a gift must be done openly and with absolute transparency.
- Gifts must be delivered at **CONFIPETROL**'s offices and/or those of its **RECIPIENTS** and not at the homes of employees working at **CONFIPETROL**'s facilities and/or those of its **RECIPIENTS**.
- Receiving and/or delivering a gift should not commit **CONFIPETROL** and/or its **RECIPIENTS** to receive or give preferential treatment.
- The maximum amount allowed to receive and/or give a gift is USD \$50 or the equivalent in the currency of the country where **CONFIPETROL** operates as a single value or accumulated semiannually in relation to the same third party. In any case, gifts must be modest and reasonable in the context of the business.
- Receiving or delivering a gift should not be a frequent practice with respect to the same **RECIPIENTS**.
- It shall not be considered irregular to accept or carry out within the social or commercial uses, invitations to promotional events in which **CONFIPETROL** and/or its **RECIPIENTS**, assume the travel and/or living expenses, provided that the purpose of such invitation is related to the operation of **CONFIPETROL**.
- The invitation or acceptance of invitations and gifts to or from persons of the Government (PEP'S), including persons who could act on their behalf, is prohibited. In case of considering that the refusal to receive the gift or invitation may deteriorate the collaborative relationship with the state entity, this must be consulted to the Compliance Office by the manager or immediate boss where the associated risk will be evaluated.

¹ For all purposes of this **POLICY**, **CONFIPETROL** is defined as the company in the countries where it operates, its consortiums, consortium companies, affiliates, subsidiaries, branches or any company or entity where it has participation now or in the future.

NON-ADMITTED PRACTICES

In no case and under no circumstances will **CONFIPETROL** employees be able to accept and/or send:

- Gifts that, by their appearance, amount and/or frequency, could be considered as a bribery mechanism and/or limit their objectivity and/or independence.
- Gifts during the negotiation process and/or the submission of economic bids.
- Cash or the equivalent in bearer documents, negotiable instruments or bonds that are redeemable regardless of their amount.
- Invitations for adults to events where obscene, lewd and/or harmful behavior to **CONFIPETROL**'s Code of Business Ethics may be generated.
- Gifts for the use and/or benefit of family members of **CONFIPETROL** employees and/or its **RECIPIENTS**.
- Gifts that violate the legal, regulatory and/or normative requirements of the countries where **CONFIPETROL** operates.
- Alcoholic beverages².
- Air or land tickets that are not related to **CONFIPETROL**'s operation.
- Gifts as a real or apparent mechanism to secure business, obtain undue advantage, generate an expectation of reciprocity or generate improper influence.

CONSIDERATIONS

- In the development of **CONFIPETROL**'s operation, the generation of political contributions is not contemplated, therefore, none of its associates, employees and/or representatives, may accept and/or send on behalf of the Company, contributions of this type.
- Philanthropic contributions and hospitality may be evaluated by the legal representative of the country where **CONFIPETROL** operates (where this type of contribution is subject to review) and its Compliance Officer; in order to evaluate the approval according to the context of the situation. In any case, neither philanthropic contributions nor hospitality should be excessive, instead they must comply with the guidelines set forth in this **POLICY**.
- Travel and representation expenses generated by partners, members of the Board of Directors, representatives and employees in the performance of their role, position and/or functions, must comply with **CONFIPETROL**'s procedures.
- The donations and/or sponsorships made by **CONFIPETROL** are validated through the Corporate Social Responsibility process, complying with the "Procedure for attention and management of requirements of the interest group communities"³.
- In **CONFIPETROL** entertainment activities are carried out with its employees, activities that may involve the delivery and/or receipt of souvenirs but are intended to contribute to the welfare of the personnel. The welfare activities are led mainly by the Human Talent team of the countries where **CONFIPETROL** operates.
- Adherence to the exchange of gifts among employees, a practice that may occur on festive occasions such as birthdays, weddings, birth of children, Christmas, among others, besides being prudent, should always be free, voluntary and spontaneous among **CONFIPETROL** employees and its **RECIPIENTS**.
- In countries where it is customary to give alcoholic beverages to managers in the administrative offices of the company, or to the management team of the contracts/services, these gifts should be returned with great courtesy, in case it is considered that such action may deteriorate the business relationship with any related party, its acceptance and treatment will be submitted to the evaluation of the General Manager and the Compliance Office.

² Only alcoholic beverages associated with the ingestion of food during a lunch or dinner will be allowed. Drinking quantities are restricted to a maximum of two (2) beers or two (2) glasses of wine during lunch or dinner. In accordance with the corporate policy on ALCOHOL, TOBACCOISM, DRUGS AND WEAPONS - GG-GEN1-PO -3 and the policy on ROAD SAFETY - GG-GEN1- PO -12. Persons who drink alcoholic beverages may not under any circumstances drive any vehicle, whether personal or Company vehicle.

³ This item applies to Colombia.

- At least once a year, the compliance area will send a communication to the relevant stakeholders to remind them of the guidelines of our gift policy, minimizing the exposure of our personnel and related to uncomfortable rejections in the administration of their gifts, especially on dates where this practice is promoted (e.g. Christmas, Thanksgiving, Mother's Day, etc.)

ACTIONS AND REPORTS

When gifts do not comply with the "CRITERIA FOR THE ACCEPTANCE AND DELIVERY OF GIFTS" set forth in this Policy, employees, partners, shareholders and/or representatives of **CONFIPETROL** must report their receipt to their immediate bosses, respectively, so that they in turn in a consolidated and periodic manner inform the Compliance Office and/or the person in charge of the Compliance function in the countries where **CONFIPETROL** operates.

Anyone who receives a gift may report its receipt directly to the Compliance Office. In any case, the report is made so that the gift is reviewed, eventually approved and registered. Accepted gifts may be destined to different social activities that **CONFIPETROL** develops from Corporate Social Responsibility - CSR, Human Talent and other areas. It is the duty of all **RECIPIENTS** to report and/or denounce any presumption of malicious proposal, ethical deviation, illicit act and/or conduct that affects or may affect the reputation of **CONFIPETROL**, to the following ethics e-mails:

- Colombia and other countries where the Company has operations: etica@confipetrol.com
- Peru: etica@confipetrol.pe

Please note that **CONFIPETROL** will not tolerate any retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this **POLICY** and/or **CONFIPETROL**'s Code of Business Ethics.

RETURNS

All gifts that do not comply with the "CRITERIA FOR THE ACCEPTANCE AND DELIVERY OF GIFTS" must be returned to their origin immediately and formally the Compliance Office will issue a response through the "GG-CUM-F-13 Format for the return of gifts". However, when the return of a gift may harm the commercial or collaborative relationship with the provider of the same, after review by the Compliance Office and/or the legal representative of the country where **CONFIPETROL** operates, the gift will be received, raffled among employees and/or delivered in a Corporate Social Responsibility activity recording proof of it.

NON-COMPLIANCE

CONFIPETROL employees are not authorized to give, offer, demand, request or accept gifts outside the parameters defined in the **POLICY**. Failure to comply with the guidelines set forth herein, will lead to the implementation of disciplinary or administrative measures according to the link and/or relationship that the **RECIPIENT** has with **CONFIPETROL**. In any case, the actions will be taken in accordance with the provisions of the regulations, corporate policies, documented information, laws and applicable regulations in force in the country where the non-compliance originates.

DISSEMINATION AND COMMUNICATION

This policy is available on **CONFIPETROL**'s web page, by clicking on the following link:
<https://confipetrol.com/sites/default/files/Confipetrol.pdf>.

Oscar Jeovanny Fernandez Moreno

OSCAR JEOVANNY FERNANDEZ MORENO
President and Legal Representative

RELATED PARTY TRANSACTIONS POLICYS

INTRODUCTION AND SCOPE

The purpose of this policy is to regulate all operations carried out between CONFIPETROL and its related parties¹, in order to manage the possible risks that may arise in transactions derived from supplies, leases, guarantees, purchase and sale of assets, financial operations, purchase, sale, provision of services, loans, hiring, equipment rental, investments, among others, and to determine the guidelines on which such operations will be valued, approved and disclosed, avoiding real or apparent conflicts of interest² and acting under the principles of equality, transparency and impartiality. Transactions between related parties also include the hiring of relatives with any degree of consanguinity of the related parties.

This policy is applicable to all management and strategic positions of CONFIPETROL and some at the tactical level, who will ensure the adoption and implementation of the guidelines set forth herein, as well as for all related and/or related parties and its compliance is mandatory.

DEVELOPMENT

All possible transactions with related parties must be notified to at least one member of the Board of Directors prior to their execution, in order to perform the respective assessment and approval, taking into account materiality, market conditions, transparency of operations, objectivity and impartiality, leaving in writing the review and approval or denial of each transaction. The members of the Board of Directors who have a real or apparent conflict of interest or are a related party, may not participate during the respective approval, because they are involved in a conflict of interest.

Related party transactions shall be disclosed in the financial statements in accordance with international accounting standards and the provisions of this policy.

Balances of related party transactions shall be disclosed in the notes to the financial statements including at least the name of the related party, amount and type of transaction.

For those transactions that have already been authorized, it will not be necessary to process a new authorization as long as the characteristics and conditions under which they were approved are maintained. Periodically and randomly, the Compliance Officer and/or any member of the Board of Directors may review the suitability of the approved transactions to ensure that the transparency and impartiality of the decisions taken in relation thereto are maintained.

All related parties that have approved transactions must comply with all internal procedures of the company before and during the execution of the authorized transaction, leaving the respective supports as evidence of transparency in the operations of CONFIPETROL.

The approved transactions between related parties shall be governed by the guidelines established in this policy, those established in the Code of Business Ethics, the procedure for handling conflicts of interest and conflict of interest policy of CONFIPETROL.

Oscar Jeovanny Fernandez Moreno
OSCAR JEOVANNY FERNANDEZ MORENO
President and Legal Representative

¹ Natural person or legal entity that directly or indirectly owns shares in CONFIPETROL, is a member of the Board of Directors (principal or alternate), president, legal representative (excluding legal representatives and attorneys-in-fact), vice president, manager, director, leader and/or with whom there is a blood, affinity, civil and/or affective relationship between them, or there are patrimonial ties and/or they exercise shareholder control or are directors or legal representatives of other companies.

² Situation that occurs when there is any link, relationship and/or participation between an employee of CONFIPETROL and legal and/or natural persons, within the company or outside it, which could affect the objectivity and independence of those involved in specific situations such as decision making and execution of actions in the development of work in CONFIPETROL and lead to personal favoring and/or third parties, directly or indirectly.