

## **POLICY OF MANAGEMENT FOR PREVENTION AND CONTROL OF THE RISK OF TRANSNATIONAL CORRUPTION OR BRIBERY**

### **TRANSPARENCY AND BUSINESS ETHICS PROGRAM**

INDUSTRIAL SOLUTION COLOMBIA S.A. – ISC S.A.S. is subject to the supervision of the Colombia’s Superintendence of Companies, and following current regulations, a risk management system was designed and implemented for the transparency and business ethics program. This system aims to contribute to the fight against transnational bribery, achieve strategic aims, and provide management with reasonable assurance concerning their accomplishment.

#### **I. OBJECTIVE**

Establish guidelines for management in the prevention and control of transnational corruption risks, with the aim of minimizing the possibility of committing corruption and offenses against transparency, ethics, and public morality through various company activities in the development of its operations.

#### **II. GENERAL CONDITIONS**

INDUSTRIAL SOLUTION COLOMBIA S.A.S. is committed to combating illicit activities and will strictly comply with applicable regulations. ISC S.A.S. will internally promote a clear rejection of any criminal activity or behavior involving bribery and/or corruption. The achievement of ISC S.A.S.'s commercial goals is contingent upon compliance with transparency and business ethics standards.

All operations, business, and contracts conducted by INDUSTRIAL SOLUTION COLOMBIA S.A. will adhere to policies and procedures outlined in its manuals and other internal regulations governing transparency and business ethics risk sources; otherwise, they will not be processed.

This policy is mandatory, as are all related procedures, and applies to all personnel, shareholders, clients, suppliers, and other parties associated with INDUSTRIAL SOLUTION COLOMBIA S.A.S.

### III. TRANSPARENCY AND BUSINESS ETHICS PROGRAM

**Due diligence for knowledge of clients and suppliers:** Individuals or legal entities looking to be part of the registry of INDUSTRIAL SOLUTION COLOMBIA S.A.S. will undergo an identification process and compliance through the completion of a form and/or the submission of supporting documentation, subject to verification and confirmation. Corresponding analyses will be conducted during their affiliation to prove coherence with their economic activity and other provided information.

**Enhanced due diligence for clients and suppliers posing a higher risk of Transnational Bribery and/or Corruption:** Depending on the product marketing method, INDUSTRIAL SOLUTION COLOMBIA S.A.S. will develop special affiliation and monitoring processes for third parties whose activities may expose them to a higher risk of ML/TF/CFT, corruption y/o transnational bribery. ISC S.A.S. will strive to find the ultimate beneficiary of goods and services traded in these cases.

INDUSTRIAL SOLUTION COLOMBIA S.A.S. will not begin contractual relationships with clients, employees, suppliers, or third parties registered with publicly available negative information related to corruption. This will be considered an important criterion for denying or ending a contractual relationship.

### IV. DUTY OF CONFIDENTIALITY

**Confidentiality Information about our customers' and suppliers' information:** INDUSTRIAL SOLUTION COLOMBIA S.A.S. will only lift confidentiality on information collected from counterparts because of written requests made specifically by competent authorities, meeting legal requirements and forms, and in cases defined by current regulations.

## V. ETHICS AND TRANSPARENCY PROGRAM REPORTING CHANNEL

What to do when you find a situation of corruption or transnational bribery risk involving ISC S.A.S., its employees, clients, suppliers, or shareholders?

INDUSTRIAL SOLUTION COLOMBIA S.A.S. has improved, through a consulting firm, a confidential internal reporting channel to manage reports submitted by anyone via email to [lineaetica@isc.net.co](mailto:lineaetica@isc.net.co). ISC S.A. has also informed its employees about this channel, as well as the official channels appointed by the Superintendence of Companies and the Secretary of Transparency of the Presidency of the Republic of Colombia.

What to do when find a situation of corruption or transnational bribery risk in general?

### **Transnational Bribery Reporting Channel:**

<https://www.supersociedades.gov.co/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional>

### **Corruption Acts Reporting Channel:**

<https://portal.paco.gov.co/index.php?pagina=denuncie>