

ANTI-CORRUPTION-AND-ANTI-BRIBERY-POLICY

Código: PO-RIS-01 Versión: 2

Fecha: 08/04/2021

QUATTRO PROYECTOS E INVERSIONES S.A.S. hereinafter QUATTRO, is committed to adhering to the highest ethical standards and to complying with all national and international anti-corruption and anti-bribery laws and regulations, for which its legal representatives issue the following Compliance Policies for the prevention of corruption and bribery.

The purpose of this policy is to set a guideline for compliance with regulations to prevent risks related to bribery to all partners, employees, contractors, who carry out activities for QUATTRO on behalf of the client. Thus achieving that QUATTRO is aligned in its activities with all applicable rules and regulations against corruption and bribery. Clarifying that the Company has zero tolerance for any conduct that could be considered bribery or that could be considered corrupt in any way.

This Policy complements the security study stage (security report, code of ethics and Compliance evaluation) of the selection process in terms of direct and/or free-lance personnel.

This Policy applies to ALL collaborators, freelancers and partners of the company; which must express their knowledge and acceptance of their obligation to comply with the regulations related to the prevention of bribery and corruption established herein, as well as those set forth in the disclosed presentation "Business Code of Ethics and Compliance" which is evaluated as evidence of full knowledge through the Compliance FR-GH-008 evaluation; another written statement will be made by signing the confidentiality commitment where the compliance manual is also mentioned, assigned with the code FR-GH-007.

The disclosure of this Policy and the Business Code of Ethics will be done through training and retraining and through mass emails.

Arq. Mauricio Vargas Gaitán Legal Representative