

	ANTICORRUPTION AND ANTI BRIBERY POLICY	Date issued: 2017-12-20
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ANTI-CORRUPTION AND ANTI-BRIBERY POLICY


INDUSTRIAS ASTIVIK, SA, a legally constituted private company, identified with Tax ID: 890.401.608-8, committed to full compliance with current regulations, and with high standards of contractual ethics on each and every one of its processes, issues this anti-bribery and anti-corruption policy, ensuring its real and effective compliance.

Due to the foregoing, this policy has as taxable persons all the Company's Directors, Associates, Employees and / or contractors, as well as the suppliers that carry out any activity on behalf of or in representation of the Company, commercial agents, insurance brokers and in general, any legal or natural person with a current commercial and / or contractual relationship, in such a way that each and every one of the previously listed must express in a free and voluntary manner their acceptance of their obligation to comply with the Program of Business Ethics that is adopted hereby.

The written statement will be made by the legal or natural person according to the documents that would apply, such as, through the commercial contract, employment contract or the corresponding instrument that protocolizes its legal relationship with INDUSTRIAS ASTIVIK SA.

The anti-corruption and anti-bribery policy of INDUSTRIAS ASTIVIK S.A emphatically prohibits bribes and gifts in any form, offered directly or indirectly or through a third party, which purpose is to obtain a benefit and / or influence the company processes. This type of conduct shall be investigated, and may be classified as "private corruption", in accordance with article 250 of the Colombian Penal Code, in line with the legal procedure. In that sense, contractors, legal representatives, managers, employees and / or whoever represents or act on behalf of the Company, are obliged to sign the Anti-corruption and anti-bribery Commitment, in that order, they will be bound to act in a loyal and honest way, with morality, integrity and honor in each and every one of the steps, activities or services that would be carried on behalf of ASTIVIK SA

This policy will be embodied in the Compliance Manual for the Business Ethics Program, defined to integrate the internal regulations on the prevention of Transnational Bribery and corruption; as well as the ethical principles and values that are held by ASTIVIK S.A., to conduct business in an ethical, transparent and honest manner.

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This policy will be published in a visible place in the company. It will be the object of massive socialization, sent through emails massively, and it will also be delivered to Agents and Suppliers, who must sign the anti-corruption and anti-bribery commitment.

Given in Cartagena on the 20th day of the month of December of the year 2017.

Updated April 17th, 2021

JAIME SANCHEZ
PIEDRAHITA R. L. ASTIVIK S.A