

I, Carlos Julio Carrero, the undersigned, an Official English – Spanish Translator in and for the Republic of Colombia, as per Professional Certificate No. 0314 dated September 14th 2010; do hereby CERTIFY that the attached document presented to me for translation into the English language is reproduced in form and substance in the following three hundred seventeen (17) pages.

The translation below is a true translation into the English language of the attached original document, which I have done upon request of the interested party. In witness whereof I affix my seal and sign below in Bogotá on this twenty-third (23) day of October, 2025.

Carlos Julio Carrero
Official Translator No. 0314



Carlos Julio Carrero
Traductor Oficial Inglés-Español
Resolución No. 0314
Septiembre 14, 2010

[Logo: Biomax]	PROGRAM	CODE: CP-PG-001
	TRANSPARENCY AND BUSINESS ETHICS PROGRAM	VERSION: 04
		DATE: Jul/28/2025

1. OBJECTIVE

This Transparency and Business Ethics Program (hereinafter "TBEP") is adopted in accordance with Chapter XIII of the Basic Legal Circular of the Superintendency of Companies for BIOMAX BIOCOMBUSTIBLES S.A. and its subsidiaries GRUPO EDS AUTOGAS S.A.S. and FUELTRANS S.A.S. and any other subsidiary (hereinafter, the "Company"). Its objective is to reaffirm the Company's commitment to ethics, integrity and transparency, establishing guidelines for ethical and transparent business conduct along with the prevention of acts of corruption, bribery, transnational bribery or any practice contrary to current regulations.

2. SCOPE

The Transparency and Business Ethics Program (TBEP) aims to prevent bribery, transnational bribery and any other corrupt practices, promoting an organizational culture based on the principles of integrity and coherence.

This Program is applicable to all partners or shareholders, Board members, directors, employees, whether direct or indirect, as well as customers, suppliers, contractors, subcontractors, strategic allies, agents, distribution channels, and any individual or legal entity acting in the name, on behalf of or in representation of the Company or maintaining a commercial, contractual or cooperation relationship with it, either nationally or internationally.

The Company encourages all Stakeholders to adopt policies and ethical guidelines in accordance with its standards. The TBEP applies to all areas and processes of the organization, including management, operational, and administrative support.

3. DEFINITIONS

For purposes of the Program, except as otherwise expressly provided, capitalized terms shall have the meanings assigned to them as follows:

Senior Management: Persons responsible for the management, administration, and control of the Company, such as Board members, Shareholders' Meeting, the Legal Representative, the General Manager or whoever takes his place, the Statutory Auditor, and other executives who participate in strategic decision-making or risk management, which lead and promote the TBEP.


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Government Entity: National, regional or foreign government agencies, state-owned enterprises, political parties, and international organizations.

Public Official: A person who exercises public functions in Colombia, appointed or elected, including public forces, official employees, and individuals with public functions.

Foreign Public Servant: A person with public functions in foreign governments or entities, including state-owned enterprises or international organizations.

Bribery: Offering or delivering undue benefits to obtain advantages in public or private functions.

Transnational Bribery: Offering or promising a Foreign Public Servant, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value, or (iii) any benefit or advantage in exchange for said public servant performing, omitting or delaying any act related to his duties and in connection with an international business or transaction.

Facilitating Payments: Informal payments to officials to speed up routine procedures.

Acts of Corruption: Improper use of power to obtain personal benefits or for third parties, in the public or private sphere.

Stakeholders: Persons or entities, internal or external, with a direct or indirect link to the Company.

- Internal Stakeholders: Senior Management, Partners, and Employees of the Company
- External Stakeholders: Customers, suppliers, contractors, authorities, and strategic allies

Compliance Officer: Person in charge of implementing and supervising the TBEP, appointed by Senior Management.

Compliance Policies: Internal rules and guidelines to prevent, detect, and manage risks of corruption, bribery, and transnational bribery.

Transparency and Business Ethics Program (TBEP): A set of policies and procedures to prevent risks of corruption, bribery, and transnational bribery and to promote ethical practices.

Due Diligence: Periodic review of the legal, accounting and financial aspects related to a national or international business or transaction, the purpose of which is to identify and


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assess the risks of corruption and transnational bribery that may affect the Company, its subordinate companies and Stakeholders.

Whistleblowing Channel / Ethics Hotline: A tool made available by the Company to all its Stakeholders, with the aim of channeling and facilitating the formulation of any communication related to the Transparency and Business Ethics Program, as well as to inform the Company of any infraction or transgression thereof or about improper conduct that may constitute an Act of Corruption or Transnational Bribery.

Compliance Audit: It is the systematic, critical and periodic review of the proper execution of the Program.

Risk Analysis: Process of identification and evaluation of possible corruption events and their consequences.

Directors / Senior Managers: Persons responsible for managing the Company, such as the Board of Directors, legal representatives, and management committee.

Conflict of Interest: A current or potential situation in which an Internal Stakeholder's personal interests (economic, professional, political, or other) interfere or may interfere with the Company's interests, affecting its objectivity, independence, or fairness.

4. APPLICABLE REGULATIONS

Regulations applicable to this Program are External Circular No. 100 000003 dated July 26, 2016 and the addition of Chapter XIII of the Superintendency of Companies' Basic Legal Circular and its updates or comprehensive modifications, Law 1474 of 2011, Law 1778 of 2016 and Law 599 of 2000, its regulatory decrees, circulars, and resolutions issued by the Superintendency of Companies on anti-corruption and transnational bribery, and the regulations that modify, replace or complement them, as well as the international agreements signed by Colombia, including but not limited to the OAS Inter-American Convention against Corruption, the UN Convention against Corruption (UNCAC), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the guides on compliance programs related to the U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act.

5. ORGANIZATIONAL STRUCTURE, DUTIES, AND RESPONSIBILITIES


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5.1. Board of Directors or Highest Corporate Body

- Approve, update, and monitor TBEP compliance
- Appoint and remove the Compliance Officer in accordance with regulatory requirements
- Know and review Compliance Officer reports on the effectiveness of the TBEP and support his work in a timely manner
- Allocate human, technical and economic resources necessary for the TBEP
- Take appropriate disciplinary action if violations of the TBEP are found by any Stakeholder
- Assess corruption risks when entering new markets
- Lead communication strategies of the Program
- Assess, together with the Compliance Officer, corruption and bribery risks when entering new markets with low corruption perceptions and take the necessary steps to mitigate these risks

5.2. Legal Representative and Management Committee

- Ensure the implementation and continuous improvement of the TBEP
- Support the Compliance Officer and jointly present the Program to the Board of Directors
- Provide resources, disseminate the Program, and execute ordered measures
- Document the Program activities ensuring integrity and confidentiality
- Authorize and provide the necessary resources for the proper implementation and fulfillment of the Program

5.3. Compliance Officer

- Monitor compliance with the TBEP and applicable national regulations on corruption and transnational bribery, as well as promoting a culture of transparency and ethics in the Company
- Submit the proposal of the TBEP and its updates for approval by the Board of Directors or the highest corporate body
- Design, implement, and update risk matrix and risk management methodologies of the TBEP


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- Submit a report on the Program implementation, execution, efficiency, and effectiveness to the Board of Directors on a semi-annual manner
- Inform the Audit and Ethics Committee about the Program execution and the violations or possible violations of the Program and/or the complaints and requests received and processed, on a quarterly basis
- Coordinate internal investigations and the whistleblowing channel and inform the Company's Legal Representative and the Management Committee about any infraction or possible infraction of the Program that, due to its threat or potential exposure to the Company, requires immediate decision-making
- Lead the socialization, dissemination, implementation, execution, and monitoring of the Program
- Ensure the protection of whistleblowers and correct documentary filing
- Define, adopt, and monitor actions and tools for the detection of the risk of corruption and transnational bribery
- Design and implement dissemination, training and education programs (induction, re-induction, and training in specific areas) for Clients and Contractors on the TBEP
- Ensure the implementation of appropriate channels to allow anyone to report, confidentially and securely, any non-compliance or suspected non-compliance with the TBEP
- Address and process all requests and complaints submitted through the Whistleblowing Channel, maintaining due confidentiality
- Order, together with the Legal Representative, the initiation of internal investigations when there are suspicions or indications about the commission of any violation of the Program
- Verify compliance with the Due Diligence procedures applicable to the Company
- Prepare the business reports requested by the competent authorities based on the TBEP
- Address and coordinate any requirement, request or record of any judicial or administrative authority

In addition to complying with the profile required by the applicable regulations, the Compliance Officer shall have the following functions and powers:


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- Autonomy to report directly to the Board of Directors, the Shareholders' Meeting or the General Manager
- Own sufficient annual budget for reviews, audits, and improvements
- Adequate physical infrastructure that ensure the confidentiality of information
- Secure technology that protects information and facilitates tasks of the area
- Sufficient, trained, competent, and experienced personnel to fulfill his duties

5.4. Audit and Ethics Committee

- Know and review the reports submitted by the Compliance Officer in relation to the Program execution and the violations or possible violations of the Program and/or the complaints and requests received and processed
- Support the Program implementation and the Compliance Officer's work
- Know, analyze, and discuss –under the Compliance Officer's leadership– the ethical reports received by the Company through the different channels provided for this purpose (Whistleblowing Channel, email, employee mailbox, among others), including the reports that come to the attention of the companies directly
- Ensure the application and compliance with the sanctioning procedures adopted and/or applicable under the Program

5.5. Internal Audit

- Include within its audit programs, at least biennially, verification activities on compliance with and execution of the Program and the processes and controls related to the prevention and control of the risk of corruption and transnational bribery
- Submit reports to the Compliance Officer on the results, conclusions, and recommendations obtained as a result of the audit activities carried out and inform the Management Committee and the Audit and Ethics Committee thereon

5.6. Employees and All Areas of the Company

- Implement and adopt a culture of prevention and compliance with the TBEP, its related policies, and the Program in general
- Inform and report all possible acts of corruption, bribery or transnational bribery and in general any violation of the TBEP


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- Apply defined controls for risk management under the TBEP

6. GENERAL POLICY ON TRANSPARENCY AND BUSINESS ETHICS

6.1. Guiding Principles

The Company urges all its Stakeholders to act with integrity, awareness, and consistency with corporate values, promoting responsible, transparent and sustainable decisions. In the event that a situation is not covered by the Program or Compliance Policies, action must be taken in accordance with the general principles, without exception.

- **Legality**

All activities are based on compliance with the law and the internal guidelines adopted. Circumvention of applicable regulations is not tolerated.

- **Integrity**

A fair, honest behavior that is aligned with the Company's ethical values is expected, beyond simple regulatory compliance. Any relationship with officials or third parties is governed by the Code of Ethics, the TBEP, and current regulations.

- **General and Corporate Interest**

Decisions must be made in the general interest and in the interest of the Company, free from personal interests or those of third parties. Conduct must be transparent and away from acts of corruption.

- **Reciprocity and Collaboration**

All contractual relationships include obligations to the Program. Knowledge of the Program and the construction of relationships based on trust and respect are encouraged. The Program will be available in the official languages of the countries where the Company operates.

- **Prevention**

The Company implements mechanisms for the prevention and detection of acts of corruption through controls, evaluations, and audits led by the Compliance Officer. Awareness and co-responsibility in the implementation of the Program are promoted.

- **Responsibility**


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Any act of corruption will be investigated and punished, regardless of hierarchy or circumstances, ensuring proportionality and due process.

- **Duty to Report**

Secure, confidential and anonymous channels are enabled to report irregularities. Whistleblowers are protected from retaliation or harassment, and the consequences of non-compliance with the Program are clearly communicated.

6.2. Zero Tolerance for Acts of Corruption, Bribery and Transnational Bribery

The Company maintains a policy of ZERO tolerance for corruption, bribery, and transnational bribery, without exceptions or justifications, under any circumstances, whether direct or indirect, nor does it allow to make or request facilitating payments. It is forbidden to offer, give, request or accept money, gifts or other benefits to influence public or private, national or international decisions. Any conduct that could be construed as an act of corruption, bribery, or transnational bribery is expressly prohibited. The company reiterates its policy of ZERO tolerance for this type of conduct.

6.3. Senior Management Commitment

The Company's Senior Management reiterates its commitment to integrity, transparency, and compliance with the Transparency and Business Ethics Program (TBEP), promoting an ethical culture at all levels of the organization and ensuring the necessary resources for its implementation, supervision and continuous improvement. Senior Management is committed to regularly evaluating the TBEP results and leading by example.

6.4. Promotion of an Ethical Culture

The Company will always foster a culture of business ethics based on principles, values, and responsible conduct, promoting upright decision-making at all levels and relationships, both internal and external.

7. SPECIFIC PROCEDURES OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM FOR THE PREVENTION OF CORRUPTION, BRIBERY, AND TRANSNATIONAL BRIBERY

These procedures are described in greater detail in the Policies of the Transparency and Business Ethics Program.

7.1. Donations, Contributions, and Sponsorships


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The Company does not contribute to campaigns, political parties, or sponsor events for purely political purposes. Any exceptions require written approval from the Board of Directors.

Donations are made as part of corporate social responsibility or in the case of contributions and sponsorships for lawful purposes such as marketing, brand positioning or union initiatives, with prior approval and following the corresponding Donations, Contributions and Sponsorships Policy. They are subject to Due Diligence and supervision by the Compliance Officer and the Management Committee. Its use to conceal Acts of Corruption is prohibited.

7.2. Relationship and Interaction with Public Officials

Employees, partners or shareholders must not accept requests for corruption, bribery or transnational bribery by national or Foreign Public Officials regardless of their position, role, responsibility, hierarchy, authority or nature of the Government Entity. Any related irregularity must be reported and brought to the Company's attention immediately through the Whistleblowing Channels or Ethics Hotline and the procedure established by the Company in the Interaction and Relationship with Public Officials Policy CP-PL-004 must be followed.

7.3. Compensation and Payment of Commissions to Employees, Associates, and Contractors

All payments must have the respective supporting documentation, such as invoices, electronic transfers, and certificates so that the respective compensation can be supported in accordance with the Company's payment and compensation policies.

Practices involving diversion of resources or violating the Company's policies are prohibited. Payments, compensations, commissions, bonuses, incentives, and any remuneration to employees must be made in compliance with the defined objective requirements, so that they cannot be interpreted as an irregular payment or generate a conflict of interest.

No Employee will tolerate or accept requests from suppliers, contractors or any third party to give compensations or make payments in violation of the Company's procedures and policies.

7.4. Gifts and Gratifications


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The decisions of the Company, its employees, and our counterparts must be objective and not influenced by gifts, gratifications, or favors. It is prohibited to offer or receive gifts, gratifications or benefits from or granted to Public Officials or representatives of private companies with the purpose of unduly influencing decision-making. Gifts are only allowed within the framework permitted by the Gifts and Gratifications Policy CP-PL-005 and the Company's Code of Ethics and Basic Principles.

7.5. Entertainment and Travel Expenses of Senior Managers and Employees

The entertainment, food, lodging and travel expenses of Directors and Employees must be managed under criteria of reasonableness, need and business purpose, ensuring their adequate justification and documentation, which will be included in the Company's annual budget in accordance with the Company's Travel Expenses and Advances Policy CA-PL-004.

7.6. Conflicts of Interest

The Company strives to avoid situations in which the personal interests of employees, partners, and shareholders, whether economic, commercial, labor-related, personal or of any other nature, conflict with or interfere or seem to interfere with the Company's decisions, or detract from its independence, fairness or objectivity in its actions to the detriment of its interests.

In the presence of conflicts of interest, the Stakeholders' actions must adhere to the guidelines set forth in the Company's Code of Ethics and Basic Principles, as well as the provisions of the Conflict of Interest Management Policy CP-PL-002. And, in any case, it must be governed by the principles of transparency, commitment to ethics, due diligence, and duty to inform of the situation constituting a conflict of interest, avoiding privileged, discriminatory or contrary behavior to the detriment of the Company's interests.

All employees must make a conflict of interest declaration in the format defined for this purpose by the Company, at the time of their engagement and subsequently update it annually and/or at any time that the current or future circumstances related to it change. Reported conflicts of interest will be analyzed and managed by the Compliance Officer and/or the Ethics Committee, when deemed necessary.

7.7. Accounting Records

The Company will maintain accurate records of its accounting operations and transactions. It is prohibited to alter or omit accounting information, especially to hide


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direct or indirect payments related to corruption, bribery or transnational bribery, gifts, kickbacks or other conduct contrary to the applicable regulations in this matter. The Company will comply with the provisions regarding accounting, books, records, and provisions, and will take into account the rules applicable to the tax audit provided for in article 207 of the Commercial Code and other applicable accounting standards, which allow the Company's tax auditor to verify the accuracy of the accounting and ensure that the transfers of money or other assets between the Company and its subordinate companies, direct or indirect payments related to bribes, gifts, kickbacks or other corrupt conduct are not concealed.

All possible red flags must be considered in the analysis of accounting records, operations or financial transactions and the Compliance Officer must be informed if identified, including: (i) Invoices that seem to be false or do not reflect the reality of a transaction or are inflated and contain excess discounts or refunds. (ii) Transactions abroad, the contractual terms of which are highly sophisticated. (iii). Transfers of funds to countries considered tax havens or with strategic deficiencies, weak governance, systematic corruption or ineffective anti-bribery controls. (iv) Transactions that do not have a logical, economic or practical explanation. (v). Transactions outside the ordinary course of business. (vi) Transactions in which the identity of the parties or the origin of the funds is unclear. (vii) Assets or rights, included in the financial statements, that have no real value or do not exist.

8. DUE DILIGENCE

In order to know the counterparties before establishing or maintaining commercial, contractual or legal relationships, the Company will apply due diligence procedures in order to prevent risks of corruption, bribery, transnational bribery, and conflicts of interest.

The guiding principles of this due diligence are transparency, integrity, and regulatory compliance in accordance with the Company's Due Diligence procedure.

9. RED FLAGS

Some non-exhaustive red flags that should be taken into account by the Company and Interested Counterparties are below:


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- Contracts with unreasonable or unusual terms (extremely short terms or unjustified restrictive clauses)
- Inconsistent or incomplete third-party information, especially in key aspects such as beneficial ownership, shareholding structure
- The counterparty, partners or directors have been investigated in terms of corruption, bribery or transnational bribery
- Third party with no verifiable track record, especially if they present themselves as intermediaries or consultants with no clear experience
- Requests for payments in cash, to personal accounts or in jurisdictions unrelated to the transaction, especially if they are deemed high risk for corruption or bribery or show strategic deficiencies in the prevention of these conducts
- Unusual or disproportionate trading conditions, such as excessive fees or irregular payment deadlines
- Recent change in the shareholding or management structure, just before the start of the business relationship
- Lack of verifiable street address or functional institutional website
- Relationship promoted internally by collaborators with potential conflicts of interest, without having been formally declared
- Gifts, gratifications or donations without clear justification, especially if they involve Public Officials or counterparts who are immersed in decision-making processes of any kind within the Company
- Business relationships with Politically Exposed Persons (PEP) without proper due diligence
- Pressure to approve businesses or transactions without complying with internal procedures and authorizations

10. RISK MANAGEMENT METHODOLOGY PROCEDURE

The identification, assessment and processing of risks related to corruption, bribery, and transnational bribery is carried out in accordance with the *Risk Management Methodology Procedure CP-PR-005* adopted by the Company. This procedure establishes the guidelines and methodologies used for adequate management and monitoring of risks and their controls.


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11. MONITORING OF THE TBEP

The Company will periodically evaluate the effectiveness of the TBEP through compliance indicators and internal audits. The Program will be updated in the face of regulatory changes, identified risks or adjustments in the organizational structure, ensuring its validity and effectiveness.

12. QUERY AND WHISTLEBLOWING CHANNELS

The Company has channels for any counterparty to report possible acts of corruption, bribery, transnational bribery or violations of the Transparency and Business Ethics Program. Reports can be made anonymously and confidentially. The Company prohibits any form of retaliation against those who report, in good faith, possible acts of corruption, bribery or violations of the TBEP.

It will be ensured that whistleblowers, in good faith, are not subject to dismissal, sanctions, discrimination, harassment or any type of retaliation. The company will ensure that the appropriate controls are in place and implemented to preserve the confidentiality of reports. Any action against this principle will be considered a serious offense and may lead to disciplinary and/or legal sanctions.

The Company fosters an environment of trust and integrity, where reporting misconduct is a manifestation of ethical commitment.

The channels enabled are:

- Biomax webpage: <http://www.resguarda.com/biomax>
- Autogas webpage: <https://www.autogas.com.co>
- Email: etica.biomax@resguarda.com
- Email: Lineaetica@autogas.com.co
- Telephone: 01-800-752-2222

In addition, official channels made available by the Superintendency of Companies, as well as by the Secretariat of Transparency, can be used to report Transnational Bribery and Acts of Corruption, respectively:

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


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- <http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion>

13. DISSEMINATION AND TRAINING

The Transparency and Business Ethics Program will be available to all counterparties on the Company's website (www.biomax.co and www.autogas.com.co) and other physical and electronic media, such as emails and publications in document management systems, will be used.

The Compliance Officer will be responsible for the content creation for trainings related to this Program. The Training and Development area (HR) is responsible for ensuring the creation and execution of the annual training plan for all the Company's employees, which will be disseminated through E-learning, publications, and physical media.

The Company promotes the creation and availability of tools that facilitate the access, knowledge, and training of Contractors, Employees, and Associates regarding the Compliance Policies and the Transparency and Business Ethics Program (TBEP).

14. ARCHIVING AND PRESERVATION

The procedures for archiving and preserving documents related to International Businesses or Transactions in which the Company is involved, as well as those associated with the Transparency and Business Ethics Program (TBEP), must comply with the Company's document management system and observe the established document retention tables.

Such documents must be kept for a minimum period of ten (10) years, in physical or electronic format. Once this period has expired, they may be deleted, provided that their exact reproduction through electronic or digital means is ensured, in accordance with the provisions of the applicable internal provisions.

15. CONFIDENTIALITY AND NON-DISCLOSURE

All information related to the Program implemented by the Company and obtained in the development of its provisions, procedures or policies, is confidential information and is subject to confidentiality, and therefore may only be disclosed to the Compliance Officer,


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Directors, and the Company's authorized employees or the competent authorities, provided that a prior request has been made and there is a legitimate reason for accessing the information, ensuring that this does not violate the rights of third parties and/or jeopardize investigations or the Company. All managers and employees have the obligation to safeguard information related to the Program, and limit its use to strictly determined purposes.

16. VALIDITY AND UPDATING

This Transparency and Business Ethics Program is in force as of its approval by the Board of Directors of the companies. In accordance with the nature of the Program, its provisions may only be repealed, amended or added to by means of a decision validly adopted by the Board of Directors. This Program will not be reproduced, distributed, modified or lent in whole or in part without the prior written authorization of the Board of Directors, the Legal Representative authorized to do so and/or the Compliance Officer, except for the purposes of the Program dissemination and training.

The Transparency and Business Ethics Program (TBEP) must be reviewed and updated at least every two (2) years, in order to ensure its validity, effectiveness, and alignment with the normative, regulatory and operational changes that may impact the Company.

17. RELATED DOCUMENTS

The following documents are an integral part of this Program:

- Donations, Contributions and Sponsorships Policy
- Interaction and Relationship with Public Officials Policy CP-PL-004
- Gifts and Gratifications Policy CP-PL-005
- Conflict of Interest Management Policy CP-PL-002
- Travel Expenses and Advances Policy CA-PL-004
- Risk Management Methodology Procedure CP-PR-001

By order of the Board of Directors, its updates will be approved by the Company's Main Legal Representative on behalf of the management.

18. SANCTIONS


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The Company will apply sanctions to associates, directors, and employees who fail to comply with this policy, the Program or the applicable regulations, following procedures established according to the severity of the non-compliance. Labor sanctions do not exclude possible civil, administrative or criminal sanctions, especially in cases of corruption and transnational bribery. The Legal Representative and the Compliance Officer shall, together with the legal area, report corruption violations to the competent authorities. Clients or contractors who fail to comply may face the application of contractual clauses or the contract termination, without prejudice to the actions initiated by the competent authorities. In the event of non-compliance by foreign authorities or Public Officials, the corresponding report will be made to the enforcement entities. Ignorance of the Program or the regulations does not justify non-compliance.

19. TRACK CHANGES

Version	Date	Description of the Change
1	Jun/23/2021	Creation of the first version document
2	May/23/2022	General update of the structure and content, especially in relation to the whistleblowing channel, inclusion of reporting channels, authorities, non-retaliation.
3	Dec/18/2023	Adjustment to responsibilities and expansion of scope.
4	Jul/28/2025	<ol style="list-style-type: none"> 1. Comprehensive program change 2. Update of the program objectives 3. Program scope update – elimination of GNE soluciones as part of the company 4. Update of the general policy on transparency and business ethics 5. Update of the program responsibilities 6. Update of red flags 7. Elimination Annex 1 Risk Management Methodology for the creation of a related procedure 8. Inclusion of guidelines on protection for whistleblowers 9. Update of PACO URL (anti-corruption portal)

[Logo: Biomax]	PROGRAM	CODE: CP-PG-001
	TRANSPARENCY AND BUSINESS ETHICS PROGRAM	VERSION: 04
		DATE: Jul/28/2025

Prepared by	Revised by	Approved by
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