

CODE OF CONDUCT <DOCUMENT NAME>		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

CODE OF CONDUCT

Ethical and Socially Responsible Management System



CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

Contents

INTRODUCTION	5
1. OBJECT	6
2. SCOPE OF APPLICATION	6
3. VALUES, COMMITMENTS AND PRINCIPLES	6
3.1. VALUES AND COMMITMENTS.....	6
3.2. ORGANIZATIONAL PRINCIPLES.....	7
4. PRINCIPLES OF ETHICS	8
4.1. HIGH MANAGEMENT.....	8
4.1.1 Ethical Principles.....	8
4.1.2 Ethics with Workers:.....	8
4.1.3 Company Structure.....	9
4.1.4. Ethical Management Policy and Social Responsibility	10
4.1.5. Corporate Social Responsibility Committee	10
4.1.6. Members of the Committee.....	10
4.1.7. Responsible for Ethical Management	10
4.1.8. Risk Management	10
4.1.9. Social Responsibility Plan.....	11
4.1.10. Relationship and Dialogue with Stakeholders	11
4.1.11. Anti-corruption policy	11
4.1.12. Internal Audits.....	11
4.1.13. Management Review and Continuous Improvement.....	11
4.1.14. Disclosure of Non-Financial Information.	11
4.2. PEOPLE WHO MAKE UP THE ORGANIZATION.....	12
4.2.1 Ethical Principles.....	12
4.2.2. Human Rights.....	13
4.2.3. Equal opportunity and non-discrimination	14
4.2.4. Diversity and Inclusion Management.....	14

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.2.5. Reconciliation of personal, family and work life	14
4.2.6. Design and Structure of the organization	14
4.2.7. Monitoring of the working environment	14
4.2.8. Health and Well-being at work	15
4.2.9. Training and Promotion of Employability	15
4.2.10. Responsible restructuring	15
4.3 CLIENTS	16
4.3.1 Quality principles	16
4.3.2. Ethics in contractual matters	16
4.3.3. Responsible Innovation	16
4.3.4. Quality and Excellence	16
4.3.5. Responsible information for products and services	18
4.3.6. Access to Products and Services	19
4.3.7. Advertising and Responsible Marketing	19
4.3.8. Responsible Consumption	20
4.4. SUPPLIERS AND SUPPLY CHAIN	20
4.4.1. Values and Ethical Principles	20
4.4.2. Responsible Purchasing	20
4.4.3. Supplier Evaluation and Approval System	20
4.4.5. Promotion of Good Practices support and improvement measures	20
4.5. SOCIAL ENVIRONMENT AND IMPACT ON THE COMMUNITY	21
4.5.1 Ethical Values and Principles	21
4.5.2. Measurement and Evaluation of Social Impact	21
4.5.3. Investment in the Community	21
4.6 ENVIRONMENTAL ENVIRONMENT	22
4.6.1. Values and ethical principles	22
4.6.2. Identification of environmental activities and impacts, environmental management programs, risk plan and strategies against climate change	22
4.7. INVESTORS	23

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.7.1 Values and ethical principles.....	23
4.7.2 Good Governance, Ownership and Management.....	23
4.7.3 Transparency of information.....	23
4.8 COMPETITION	23
4.8.1. Fair competition.....	23
4.8.2 Cooperation and partnerships.....	23
4.9. PUBLIC ADMINISTRATIONS.....	24
4.9.1. Values and ethical principles.....	24
4.9.2. Compliance with legislation and regulations	24
4.9.3. Responsible taxation	24
4.9.4. Collaboration and public-private partnerships.....	24
5. CHANNEL TO RESOLVE COMPLAINTS, CLAIMS, COMPLAINTS OR SUGGESTIONS	24
6. SANCTIONING MEASURES.....	25
7. COMMUNICATION AND DISCLOSURE	25
8. COMPLIANCE WITH THE CODE OF CONDUCT.....	25
9. VALIDITY AND APPROVAL.....	26

COPIA CONTROLADA 001

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

INTRODUCTION

INSURCOL aims that the development of its activities is carried out considering not only the economic parameters, but also social, environmental and good governance, to ensure that its actions are framed within a responsible policy, which has an impact on its stakeholders; that is why the company establishes the Code of Conduct with which it seeks to obtain the highest management standards that its shareholders, customers, suppliers, workers and the community in general deserve.

INSURCOL is voluntarily committed to Ethical and Socially Responsible Management, which leads to transparent business practices and strict compliance with the regulations in which it operates.

COPIA CONTROLADA 001

<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

1. OBJECT

This Code of Conduct was prepared by the Social Responsibility Committee and aims to establish a set of Values, Principles and other aspects that govern the behavior of INSURCOL including its employees in the fulfillment of the functions and in their commercial and professional relations, acting in accordance with current regulations.

2. SCOPE OF APPLICATION

The Code of Conduct applies to all personnel who work at INSURCOL directly and indirectly, who in one way or another interact in the development of their business activity.

This Code is mandatory and therefore not recommendations. It is a fundamental document for the organization insofar as it includes fundamental aspects to guide the way in which INSURCOL has to carry out its activities.

This code of conduct will be announced in the induction process to all applicants, annually through an annual training plan and will also be available on page www.insurcol.com for consultation.

3. VALUES, COMMITMENTS AND PRINCIPLES

3.1. VALUES AND COMMITMENTS

In **INSURCOL** we have nine (9) values that determine our behaviors and attitudes towards daily work, make us grow personally and professionally, unite us more with colleagues and guide us to offer better customer service.

1. COMMITMENT:	The personnel belonging to INSURCOL must develop their assigned tasks with commitment so that they are executed according to the requirements of the clients, the community, the user, owners, workers, state and other organizations.
2. LEADERSHIP:	INSURCOL has officials who have the ability to generate and positively accept changes and develop the potential of a work team emphasizing innovation and committing to a common object to ensure good development with all stakeholders.
3. HONESTY:	All the activities and all the personnel of INSURCOL , develop and act in a transparent way, with the truth in the execution of their tasks where the common good prevails over the particular good.
4. RESPECT:	Respect is the basis of all coexistence in society, it implies the understanding and acceptance of the fundamental condition of people as human beings with rights and duties in a constant process of spiritual and material improvement. It is to establish how far my possibilities of doing or not doing go, and where the possibilities of others begin. That is why at INSURCOL we work so that all people, communities and their environments are treated without any discrimination. Avoiding cases of workplace harassment, sexual harassment, and gender discrimination.
5. RESPONSIBILITY:	In INSURCOL all staff have the ability to recognize and accept the consequences of decisions made freely; likewise, they are in the moral obligation to fulfill the assigned duty efficiently and effectively, in order to satisfy the client, the community, the owners, the users, the workers, the state and other organizations. Responsibility is fundamental for us to function as people and for society to function as a whole.

6. INTEGRITY:	<p>Integrity at INSURCOL is expressed when we work for the responsible dissemination of truthful and timely information, and for the production of quality audiovisual content, based on values that contribute to the development of society. Integrity includes:</p> <ul style="list-style-type: none"> • Remain faithful to the obligations acquired • Be honest • Be honest in word and deed, and expect the same from others • Accept responsibility for our actions • Be a morally correct person.
7. CULTURE:	<p>Culture is the common mode of organized thinking of the individuals of a society in order to produce coherent social activities, both of material action and of individual action. Culture is the product of learning and not of inheritance. In Insurcol a culture of positive thinking is practiced, having as pillars action, language, attitude and thought; all aimed at the orientation of achievement.</p>
8. SERVICE:	<p>Providing help spontaneously in the smallest details speaks to our high sense of collaboration to make life lighter for others. To serve is to help someone spontaneously, as a permanent attitude of collaboration towards others. The helpful person is in his work, with his family, but also on the street helping other people in seemingly insignificant things, but that are making life lighter. Helpful people live continuously attentive, observing and looking for the right moment to help someone, they suddenly appear with a smile and hands ahead ready to make us the simplest task, in any case, receiving a favor gives birth within us a deep gratitude.</p>
9. RELIABILITY:	<p>Fulfillment of the commitments acquired with third parties. It can be defined as the ability of a product to perform its function as intended. Otherwise, reliability is the probability that a product will perform its intended function without incident for a specified period of time and under indicated conditions.</p>

3.2. ORGANIZATIONAL PRINCIPLES

- **Safety at Work** is paramount in the development of our work to ensure the safety of our workers.
- INSURCOL acts and is continuously committed to **Respect for the environment** in all the activities carried out by the company.
- In INSURCOL we work for the fulfillment of commitments acquired with our interested parties guaranteeing the **satisfaction of our customers**.
- **Proactive thinking**, we are sure that all people have the talent and capacity to be creative and willing, to anticipate the future to respond successfully to new economic, social, cultural and moral challenges.
- In INSURCOL **we work as a team** to develop a common commitment and set objectives and expectations collectively for the achievement of the institutional mission.
- The workers of INSURCOL express themselves continuously based on **the pillars of positive thinking** that generate change of Thought, Action, Language, and Positive Attitude.

<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

4. PRINCIPLES OF ETHICS

The following sections set out the ethical principles and values that guide INSURCOL's actions. In each of the following management areas (related to the company's stakeholders) established by the SGE-21 standard:

Senior Management
Clients
Suppliers
People who make up the organization
Social Environment
Environmental Environment
Investors
Competence
Public Administrations

4.1. HIGH MANAGEMENT

4.1.1 Ethical Principles.

The basic values that characterize the ethical conduct of officials who hold managerial positions at the service of INSURCOL, in addition to those indicated for INSURCOL workers, include the following:

1. Suitability that implies academic preparation, experience and consistency with the principles and values of the institution.
2. Leadership framed within the aims, Mission and Institutional Values.
3. Know and commit to the Code of Conduct of the company that will be constituted in its framework of action.
4. Manage, use and safeguard institutional resources and assets under the protection of ethical principles and values.
5. Ensure compliance with laws and constitutional obligations in the light of best ethical practices.
6. Promote, promote and execute ethical management policies and build strategies to achieve the fulfillment of the objectives, which lead to the effective fulfillment of the Mission and the strengthening of the institutional image.

4.1.2 Ethics with Workers:

1. Guarantee the treatment of workers with dignity, respect and equality, taking into account their cultural diversity.
2. No employee or job applicant shall be subject to gender discrimination on the basis of race, skin color, religion, sex, age, nationality, citizenship status, marital status, sexual orientation, or physical disabilities.
3. Harassment, whether in the workplace, sexual, verbal, physical or visual, directed at an employee is prohibited because of their race, skin color, religion, sex, age, nationality, citizenship status, marital status, sexual orientation or physical disabilities.
4. Ensure that the use of computer systems with and among workers is not generated to create, view or forward offensive language, offensive images or messages, material of sexual or racial content that is offensive or discriminatory to any employee, person or group.
5. Promote the development, training and professional promotion of its workers.
6. Promote the reconciliation of personal, family and professional life of workers with work.
7. Provide the participation of workers in the social action activities in which the company participates.

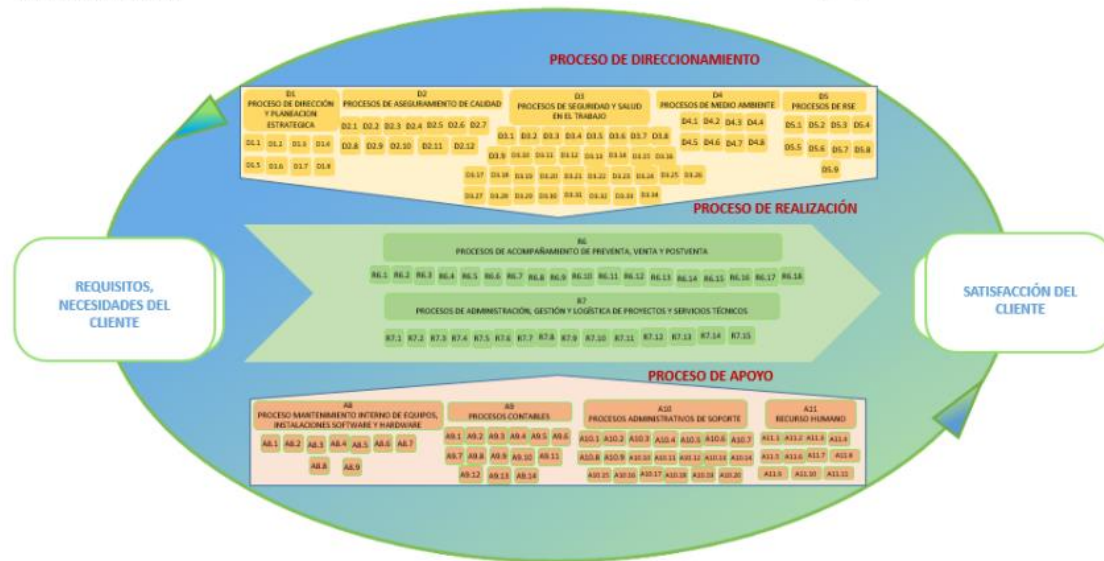
8. Equal opportunities for its workers, recognizing the merits and capacity of each worker according to the performance evaluation allowing their professional ascension.
9. Have internal means of communication with which you can generate suggestions, complaints and / or claims in relation to the continuous improvement of your processes.
10. Guarantee safety and health at work, for which the necessary measures are adopted to achieve optimal working conditions.
11. Have participation mechanisms to ensure that the decisions taken within the company do not affect them directly or indirectly, thus achieving job stability for all.
12. Guarantee and respect the right for workers to join trade unions and for them to bargain collectively with the company.
13. Avoid the hiring of minors, in case it is presented by practitioners, it will be carried out under the parameters of the substantive code of work in Colombia.
14. Contribute to compliance with the program of prevention of money laundering and financing of terrorism, as well as with the program of transparency and business ethics established by the organization.

4.1.3 Company Structure.

The Management has defined the structure of general functions of the company, with its different levels of relationship, in the document Process Map, In addition, the responsibilities of each of the functions for each of the positions are defined.

At the operational level, the general functions derive in the definition of the different jobs of the organization. The Human Resources area keeps updated a table where people and positions at all levels of the organization are identified.

IX. MAPA DE PROCESOS



<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

Likewise, the corporate social responsibility committee is available to all those in the organization who request information about the characteristics of the job they occupy.

4.1.4. Ethical Management Policy and Social Responsibility

The Management has defined and approved the Ethical Management and Social Responsibility Policy, which is within the Integral Management Policy under the CODE IN-CAD31, which is available to all the staff of the organization, including external collaborators. This Policy includes the commitment of the Management with respect to ethical behavior, including the social, ethical and environmental aspects and good governance derived from the applicable legislation.

The Policy is reviewed semi-annually by the Ethics and Social Responsibility Management Committee to verify its adequacy to the organization or, if necessary, make appropriate changes.

4.1.5. Corporate Social Responsibility Committee

Senior management has defined the internal regulation document of the IN-CAE04 code committee, which describes its performance and functions.

4.1.6. Members of the Committee.

The Integral Management Committee is formed as follows:

1. The Senior Management has a representative of the management, which is the President of the Integral Management Committee.
2. The representatives of the departments are elected at the discretion of Senior Management.
3. The secretary of the Integral Management Committee is the Quality Coordinator and/or quality sub-coordinator.
4. The HSE & CSR coordinator will be in charge of monitoring and controlling the corporate social responsibility system.
5. Representatives of the departments will have a voice and vote to intervene in all matters that are discussed in the committee.
6. In case the representative of the department does not attend, a delegate appointed by the representative will assume the responsibilities.

4.1.7. Responsible for Ethical Management

Likewise, the Management has appointed the HSE & CSR Coordinator as the Responsible for Management, her responsibilities are in the representative procedure of the IN-CAD05 Code Directorate and she has the following functions:

- Ensure the implementation, compliance, monitoring and evaluation of the Integral Management system, coordinating the Social Responsibility committee.

4.1.8. Risk Management

Insurcol has the risk matrix code IN-AZD28-F13, where the risks associated with (ESG) are identified, and controls are established.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.1.9. Social Responsibility Plan

The document Ethics and Social Responsibility Program of code IN-AZD28 has been established, in order to establish deadlines, responsible for the execution of activities in favor of the EMS system.

4.1.10. Relationship and Dialogue with Stakeholders

The Management has defined the criteria for the identification and classification of the different stakeholders related to the company, as well as the methodology to detect their expectations and establish and prioritize action and communication plans. Evidence of communications will be preserved through the procedure Model Dialogue with Interest Groups code IN-AZD57.

4.1.11. Anti-corruption policy

Senior management has established an anti-corruption policy framed under the principles of eradicating corrupt practices, criteria for issuing and receiving gifts and attention, ways to detect and limit conflicts of interest, consultation measures against dubious actions and complaint mechanisms through the document Anti-corruption policy code IN-CAD32.

4.1.12. Internal Audits

The Quality Committee carries out Annual Internal Audits of the system in order to verify that it is correctly applied and is adequate to the requirements of the reference standard, and that it is effective in achieving the objectives and goals established.

In addition, it defines the criteria and methodology of the audit to ensure its impartiality.

As a result of the audit, an Audit Report is prepared that contains the summary and evidence of the audit, as well as the record of the deviations detected. These deviations are analyzed by the Committee, who will open the most appropriate actions in each case, this methodology is described in the document Code Audit IN-CAPO3

4.1.13. Management Review and Continuous Improvement.

Every six months, the Management carries out the review of the Ethical and Socially Responsible Management System, to ensure its adequacy and effectiveness, through monitoring indicators and preparation of continuous improvement plans. The aspects to be addressed during the review are described in the document Continuous improvement of code IN-CAD01.

4.1.14. Disclosure of Non-Financial Information.

Annually, senior management will present an Environmental, Social and Good Governance (ESG) performance report that includes:

The organization profile

Corporate governance and commitments

CSR strategies and plan (approach and results)

Main ESG indicators.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.2. PEOPLE WHO MAKE UP THE ORGANIZATION

4.2.1 Ethical Principles.

In development of the principles and values of the entity, the policies that should guide the ethical actions of the workers at the service of INSURCOL are:

1. Assume the values and principles defined in the company as the guide of the actions and decisions of the exercise of the position, always maintaining, in all private acts as well as in the functions, an explicit commitment to rectitude and honesty.
2. Give other workers fair treatment, observing labor practices based on equity and mutual cooperation within the framework of ethical principles and common values.
3. Fulfill with diligence, efficiency and impartiality the tasks entrusted, always seeking excellence in the exercise of their own functions.
4. Dedicate the greatest effort, the greatest attention and the totality of the working time to the development with the highest quality of the tasks of the assigned function.
5. Cooperate in the creation of healthy and safe working conditions, in a climate of mutual understanding and collaboration, built by dialogue among all officials.
6. Report corrupt acts anytime they are discovered.
7. Do not use confidential information as a means of gaining self-benefit.
8. Ensure the interests of the company and collaborate at all times in the achievement of its objectives, taking special care that the services offered to the public are not affected.
9. Refrain from communicating or disclosing information that could damage the image or prestige of the company.
10. Not to seek undue benefits or advantages, for oneself or for others, by using the position or invoking the company.
11. Refrain from making use of the assets of the company, for personal purposes, their relatives or third parties, and to the detriment of the interests of the institution.
12. Refrain from accepting or requesting any perk, distinction, gift or benefit, for oneself or other persons, in order to give preference to particular interests, and against those of the institution.
13. Refrain from intervening in any business where there is or may be a conflict between personal interests and the fulfillment of the obligations for the institution, which prevents the performance of functions and obligations in an integral and objective manner.
14. Always comply with the word, as well as with the commitments acquired, always giving the best of himself.
15. Limit the actions to the processes and procedures defined by the entity that allow it to best comply with the purposes and mission of the entity.
16. Respect the right to public and private life of other servants, without distinguishing between age, race, sex, sexual orientation or religious or political preference.

Employees are prohibited from entering into any agreement or understanding that violates antitrust or competition laws. The following is a list of representative cases of types of agreements with competitors that have been established as clear violations of antitrust and competition laws:

- Agreements to fix or affect prices, or other terms or conditions of sale.
- Agreements to assign customers, markets or territories.
- Agreements to set production levels or quotas.
- Agreement to boycott third parties.
- Agreements with a customer regarding the price or price levels at which the customer may sell the Company's products.

<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

There are commercial activities that can be violations of the law if it is found that they substantially reduce free competition. Employees should consult with the sub-management before agreeing on any such activity.

It is not necessary to enter into a formal agreement for there to be a violation of antitrust or competition laws. Particular attention should be paid to these activities at meetings of commercial companies which, by definition, consist of groups made up of competitors. No employee shall attend such business conventions or similar meetings, unless summoned for a valid business purpose. If any improper discussion occurs at a meeting of trade specialty associations or at any other time, you must immediately demand that the discussion cease and, if this does not occur, withdraw (or hang up the phone) immediately and report the incident as soon as possible to the Management of the Company.

Similarly, the company has fully open communication channels to make continuous feedback with interested parties, through letters, meetings directly with senior management, through our web portal, email or phone call. To do this, the company has the procedure IN-CAD06 "Customer satisfaction" where it shows the different activities to be developed depending on the type of services. In cases where there are disagreements of any kind, related to the activities of the company, these will be processed through the document IN-CAPO4 "Control of non-conformities".

4.2.2. Human Rights

INSURCOL, has a management committee that is jointly responsible with the Coordination of Human Talent in ensuring compliance with the rights established by the United Nations in the field of Human Rights.

Part of the commitment made is the responsibility to ensure that human rights are respected, both in the workplace and in their wider sphere of influence. We expect compliance with our Human Rights standards (Voluntary Principles and United Nations Global Compact) throughout the Organization. INSURCOL, does not tolerate an employee or a contractor who violates the laws or develops management that is configured in possible violations of Human Rights.

It is the duty of each and every employee, contractor and interest group in general to take appropriate measures to avoid behaviour or conduct that runs counter to the principles contained in the Universal Declaration of Human Rights, the Voluntary Principles and the UN Global Compact. It is not allowed to retaliate against any employee or person who reports these situations.

The status of compliance with these rights are delivered annually through the general report of the management.

Document IN-AZD44 Persons Who Make Up the Organization describes the commitments in relation to human rights, among which are:

- Freedom of association
- Prohibition of child labour
- Right to fair and satisfactory working conditions.
- Respect for diversity. Rejection of possible discriminatory actions based on gender, racial or ethnic origin, religion or belief, disability, age, culture or sexual orientation

The procedure will be arranged for people who make up the organization to identify, prevent, mitigate and account for addressing the impact and how to repair it.

<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

4.2.3. Equal opportunity and non-discrimination

Insurcol has established the document IN-ADD01 Selection and hiring of personnel, and training and qualification of personnel IN-CAD07 to guarantee opportunity and non-discrimination, also in the publications of vacancy applications will not be discriminated by gender, age, religion or beliefs, racial or ethnic origin, disability, cultural – sexual orientation etc. The department in charge of compliance with the parameters of opportunity and non-discrimination is the Human Resources area in charge of the HR coordinator and sub-coordinator.

4.2.4. Diversity and Inclusion Management.

To periodically identify diversity profiles, IN-AZD44-F01 Guide to the Identification of Diversity Profiles will be used, where their expectations are also identified and actions are established for the same.

4.2.5. Reconciliation of personal, family and work life

Facilitate the reconciliation of personal, family and work life of the people of the company, through the study of particular situations as established by the procedure of people who make up the organization reconciliation of personal, family and work life. Through the INNOVA system, each worker can access their job description with a login and password that is delivered at the moment

4.2.6. Design and Structure of the organization.

In the document Organization Chart of code IN-AZD47 the different Jobs of the company have been defined. All people can access this document to verify their current assignment to the different jobs, as well as the definition of activities and responsibilities of each of them.

4.2.7. Monitoring of the working environment

The Management carries out an annual monitoring of the work environment, which is reflected in the Annual Report, analyzing the results and putting in place the necessary mechanisms for its continuous improvement.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.2.8. Health and Well-being at work

The company has a management system in occupational health and safety in accordance with iso 45001 and current legislation through which it is achieved:

- A Diagnosis of occupational hazards for facilities and by charges, including psychosocial risks
- Implementation of improvements necessary to ensure a safe and healthy workplace through the schedule of occupational safety and health activities.
- Provide training to all contractor and visiting employees on the risks of occupational accidents and diseases.
- Provide information about the facilities to someone who develops activities in it.

The management of health and well-being is certified under the ISO 45001 standard.

4.2.9. Training and Promotion of Employability

Annually, the Corporate Social Responsibility Committee prepares the Annual Training Plan, which lists the training actions that are planned for the current year.
These training actions can come from:

- Requests for training made by the people of the organization.
- Training actions that the company considers necessary for the improvement of management and work.
- Those training activities derived from current legislation (for example, prevention of occupational risks).

The Annual Training Plan is reviewed and approved by the Management. At any time, the Plan can be extended with unplanned training actions, which are considered of interest to the organization is in the registry IN-CAD07-F03 Annual Training Plan.

4.2.10. Responsible restructuring.

The mechanisms for responsible restructuring are defined in the procedure IN-AZD44 People that integrates the organization.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.3 CLIENTS

4.3.1 Quality principles

4.3.2. Ethics in contractual matters

The administrative function related to the contractual processes of INSURCOL is developed in accordance with the following ethical criteria that in the matter will characterize its institutional exercise.

1. **Transparency**, which implies that the entity will act with absolute clarity in the pre-contractual and contractual processes applying the principles of objective selection and equal opportunities, having as a permanent purpose the selection of those proposals that are most favorable and convenient for the administration.
2. **Planning**, which implies that any contractual process will be developed with the technical and necessity studies in advance, which avoids improvisation, waste and waste of resources by all means.
3. **Economy**, which implies that the entity in its contracting process will manage the budgetary resources assigned to it according to criteria of economy, rationality, efficiency and austerity, preventing by all available means the misuse of public goods.
4. **Responsibility**, which implies that the entity will strictly comply with each and every one of the contractual commitments and obligations it assumes, within a policy that recognizes the responsibilities of the officials and the entity. Those who, by reason of their functions, must intervene in the conclusion, execution and control of the contracts concluded by the entity, will be liable civilly, criminally, fiscally and disciplinarily for the consequences of their acts and omissions.

4.3.3. Responsible Innovation

Establishing the guidelines for conducting research, development and innovation of processes is found in the instruction IN-AZD28-F11

4.3.4. Quality and Excellence

To guarantee quality and excellence, the quality management system is available under the NTC ISO 9001:2015 standard.

Principle 1: Customer Focus

Quality management has among its objectives to meet the needs of customers and strive to exceed their expectations.

The "Customer Focus" at Insurcol. Implies:

- Study and analyze the needs and expectations of customers.
- Ensure that the organization's improvement goals match the needs and expectations of customers.
- The needs and expectations of customers are communicated and understood to all the staff of the organization. All the people in the organization identify how their work affects the client's perception of Insurcol. and the products and services offered.

Customer satisfaction is measured and the results are acted upon.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

Principle 2: Leadership

Senior management establishes the conditions under which the people who make up the organization will participate in the achievements of the company's objectives.

The "Leadership" in Insurcol. Implies:

- That workers understand and feel motivated and identified with respect to the goals of the organization and their personal objectives.
- Improve communication between the different levels of the company.
- The needs of all stakeholders including customers, owners, suppliers, shareholders, local communities and society as a whole are considered.

Principle 3: Staff Engagement

It has competent and committed personnel in the work which allows their skills to be used for the benefit of the organization.

The "commitment of the staff" in Insurcol. Implies:

- Identification of the competencies of the staff for the performance of their functions.
- Periodic evaluation of the performance of all staff according to goals and objectives.
- Awareness of the importance of each person's work and its impact on the organization.
- Definition and clear communication of the responsibilities of each position.
- Identification of training needs.

Principle 4: Approach to processes

The comprehensive management system achieves consistent results more effectively and efficiently when activities and related resources are managed as a process.

The "Approach to processes" in Insurcol. Implies:

- The activities necessary to obtain a desired result are systematically defined.
- Clear responsibilities are established to manage activities.
- The capacity of the activities is analyzed and measured.
- Factors, such as resources, methods and materials, that will improve the activities carried out in the organization are identified.
- The risks, consequences and impacts of activities on customers, suppliers and other stakeholders are assessed.

Principle 5: Continuous Improvement

Continuous improvement allows us to maintain performance, react to internal and external changes and create new business opportunities.

The "Continuous Improvement" in Insurcol. Implies:

- Use a consistent and broad organizational approach to continuous improvement of the organization's performance.
- Provide people with training in the methods and tools of continuous improvement.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

- Make the continuous improvement of products, processes and management systems the objective of each worker in the organization.
- Establish goals to guide and measures to map out continuous improvement.
- Recognize and become aware of improvements through periodic management reviews.

Principle 6: Evidence-based decision-making

Decision making is based on the analysis of data and information that allows us to establish improvements, correct and generate preventive actions.

The "Evidence-based decision making" at Insurcol. Implies:

- Ensure that data and information are sufficiently accurate and reliable.
- Make data accessible to those who need it.
- Analyze data and information using valid methods.
- Make decisions and actions based on the analysis of the facts, balanced with experience and knowledge in the processes, legislation and applicable regulations.

Principle 7: Relationship Management

Insurcol manages its relationships with stakeholders by increasing the capacity to create value.

The "Relationship Management" at Insurcol. Implies:

- Establish relationships that balance short-term gains with long-term considerations.
- Formation of teams of experts and resources with partners.
- Identification and selection of suppliers.
- Clear and open communication with stakeholders.
- Propose and recognize the improvements and achievements of suppliers.

4.3.5. Responsible information for products and services

The company develops business practices based on transparency and positive agreements for both parties.

We attend to the requests and needs of our clients:

- We apply process design activities with the brands we represent according to the client's requirements and tailored to their conditions and walls.
- Pre-commissioning and commissioning is done to guarantee the operation of the processes and projects in an official and documented manner complying with the defined safety and security requirements.
- We develop clear and concrete quotes with indications, prices and commercial conditions as well as specifications and data sheet of the quoted equipment.

These parameters are found in the procedures of In-ATI01 Quotes and IN-ATI05 tenders respectively.

<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

4.3.6. Access to Products and Services

To facilitate access to Insurcol products and services. It has restructured its commercial area in order to have commercial personnel in each area of the country distributed as follows:

- **CARIBBEAN:** Atlantic – North Bolivar except Cartagena – North Cesar – Guajira – Sucre – Magdalena – Córdoba.
- **Cartagena:** City of Cartagena including the Cartagena Refinery complex.
- **EAST:** Santander except Barrancabermeja – Norte Santander – Norte Boyacá – Arauca – Sur Cesar – Sur Bolívar – Antioquia.
- **Barrancabermeja:** City of Barrancabermeja including the Barrancabermeja Refinery complex.
- **SOUTH - WEST:** Huila – Tolima - Putumayo – Cauca – Valle del Cauca – Nariño – Caquetá: Choco – Coffee Zone
- **BOGOTÁ-CENTRO:** Cundinamarca – Sur Boyacá
- **EAST PLAINS:** Meta – Casanare – Vichada – Guainía – Guaviare

In this way each client will be accompanied by a commercial who will guide the process of pre-sale, delivery of offer and issuance of purchase order, in addition to the process is added a specialist of line, brand or solution, who will help the processes of identification, development and innovation of solution requested by the client, because the commercial orientation is redirected to sell no equipment or projects, but SOLUTIONS to customers.

This description of the process of access to products and services is described in the document of Accompaniment of sale, pre-sale and after-sale.

4.3.7. Advertising and Responsible Marketing

Insurcol. It establishes the following principles in order to ensure responsible advertising and marketing:

- **Personal Data:** Authorization will be requested from customers, suppliers on the handling of their personal data.
- **Vulnerable audiences:** Discounts will be established once the customer requests the quote.
- **Content of veracity and relationship with media:** all information issued either Web page, Social Networks, Brochur, will contain only and only images of works, projects developed by Insurcol. and of the representation brands with current contracts.
- **Language and Tone of Communications:** All verbal or written communications will use clear and formal language.
- **Respect for the environment:** In no case will advertising be issued that leads to the damage to the environment.
- **Safe practices:** Images that promote industrial safety as a pillar will be encouraged as much as possible.
- **Advertising self-regulation:** No advertising will be issued without prior authorization from the certifying entities (Use of seal). For which all advertising must be known by the quality coordinator and the senior management and coordination of HSE & CSR of the company before its issuance, as well as it will be framed under the legislation in force in Colombia.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.3.8. Responsible Consumption.

Recommendations for responsible consumption shall be established in the quotations.

4.4. SUPPLIERS AND SUPPLY CHAIN

4.4.1. Values and Ethical Principles

The company considers that the main values that should guide relations with suppliers and subcontractors are respect and honesty, ensuring that it is fairness and justice that determines their selection and maintenance.
In accordance with our ethical principles:

- They will be informed about the Ethical Management System implemented, its repercussions and benefits, trying to involve them in a socially responsible behavior.
- The ethical and socially responsible behavior of supplier and subcontractor companies will be highly valued in their selection and monitoring processes.
- The relationship with suppliers and subcontractors must be based on respect, honesty and transparency as a means of achieving a satisfactory relationship for both parties.
- All the agreements agreed in the contractual relationship will be fulfilled, thus demonstrating that honesty is the basis on which this organization bases its commercial relations.
- Dialogue will be encouraged as a way of resolving conflicts that arise in the relationship between the two parties.

4.4.2. Responsible Purchasing

To guarantee responsible purchases and the methodology of action will be carried out through the procedure IN-AZD02 Purchases.

4.4.3. Supplier Evaluation and Approval System

The system of evaluation, approval and classification of suppliers is described in the procedure IN-CAD09 Evaluation Selection and Reevaluation of Suppliers.

4.4.5. Promotion of Good Practices support and improvement measures.

Annually the organization issues communications to suppliers in order to promote knowledge and improvement in CSR processes.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.5. SOCIAL ENVIRONMENT AND IMPACT ON THE COMMUNITY

4.5.1 Ethical Values and Principles.

In the development of the social function that INSURCOL is responsible for developing by law, the main ethical policies adopted with the community by the company are:

1. Guarantee the provision of the service with quality, promptness, opportunity, effectiveness and efficiency, through an adequate, trained work team, with institutional and social commitment.
2. Generate positive management results, in order to contribute to the rights and interests of citizens, seeking a better positioning of the entity, translated into credibility, trust and good image in front of society.
3. Lead processes of scientific research and knowledge transfer that responds to problems identified in the communities.
4. To train integral professionals, characterized by being competitive and competent, critical and self-critical, creative and innovative, participatory and tolerant, democratic and autonomous and capable of leading processes of change.
5. Refrain from any act or activity that practices discrimination based on gender, age, socioeconomic status, marital status, religion, political or national inclinations, workplace harassment, sexual harassment.

4.5.2. Measurement and Evaluation of Social Impact

Once the organization receives a contract to execute, the matrix of socio-environmental aspects and impacts is carried out where the concrete actions and measures are taken for those identified impacts.

4.5.3. Investment in the Community.

The organization will promote volunteer actions of its workers, and will have all the traceability of social investments, analyzing the social, environmental and economic impact of them.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

4.6 ENVIRONMENTAL ENVIRONMENT

4.6.1. Values and ethical principles

The main ethical environmental policies that INSURCOL adopts in compliance with the environmental requirements imposed by the constitution and laws are:

1. Each official in a constant, responsible, supportive, respectful and effective way will deliver the best of himself to make an austere and efficient use of the work elements at his disposal that leads to concrete and immediate actions of recycling, saving resources and their conservation.
2. In all areas and dependence of the company, a responsible and adequate use must be made of the natural and material resources necessary to fulfill the assigned functions without sustainably affecting the natural environment we inhabit.
3. To become permanently managers and promoters of healthy natural environments among our own co-workers and other fellow citizens.
4. The company will promote the constitution of a healthy work environment, which provides environmentally responsible goods and services to society.
5. Properly manage noise emissions so as not to disturb the other work sites of the institution.

4.6.2. Identification of environmental activities and impacts, environmental management programs, risk plan and strategies against climate change.

The organization has an environmental management system under the NTC ISO 14001 standard, which establishes commitments, identifies impacts and establishes actions to reduce and mitigate environmental pollution.

<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

4.7. INVESTORS

4.7.1 Values and ethical principles

Within the established principles and values, all investor actions will be governed by transparency and loyalty, for which the code of good governance establishes.

4.7.2 Good Governance, Ownership and Management

CODE OF GOOD GOVERNANCE: INSURCOL, openly disposes of all the information related to the financial and operational behavior of the same to all its investors, given this within the principles of transparency, loyalty and good faith developed in each of the activities. Within the review report of the System by the MANAGEMENT IN-CAD01, which is carried out on a semi-annual basis, the total behavior of the company is reflected; where the state of effectiveness and efficiency of the management systems by which we are governed are shown. In the same way, the procedures IN-ADIO19 Reports are available; IN-ADIO20 Year-end and IN-ADIO22 Special Reports and Requirements; which establish the necessary criteria in financial matters to keep senior management and its shareholders informed when they require it.

4.7.3 Transparency of information

The organization's accounts are public and disclosed through the sustainability report, delivered to the relevant regulatory entities and available for consultation by client.

4.8 COMPETITION

4.8.1. Fair competition.

To ensure fair competition the organization submits to the guiding principles and arbitration of our clients, the procedures established for this purpose and to ensure ethical behavior is procedure of IN-ATI01 Quotations and IN-ATI05 Tenders respectively.

4.8.2 Cooperation and partnerships.

To guarantee cooperation and alliances and transparent processes in them is developed through the procedure IN-AZD28-F12 Cooperations and Alliances

<DOCUMENT NAME>		
CODE OF CONDUCT		
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17

4.9. PUBLIC ADMINISTRATIONS

4.9.1. Values and ethical principles

The company considers that relations with the Public Administration should be based on honesty and the fulfillment of its expectations or requirements. The company defines the following as ethical principles:

- We are committed to satisfying all legal requirements for the Public Administration.
- We will establish an anti-corruption policy in dealing with the Public Administration, applying zero tolerance for bribery and extortion practices, committing ourselves to their denunciation in the event that such practices are detected.

4.9.2. Compliance with legislation and regulations

The identification, implementation and compliance with legislation and regulations is carried out through the procedure IN-CAI01 Supplier Database.

4.9.3. Responsible taxation

The organization has an external tax review that is responsible for monitoring the good accounting procedure, cancellations of taxes related to the volume of activities carried out.

4.9.4. Collaboration and public-private partnerships

The organization has established the procedure IN-AZD28-F12 Cooperations and Alliances, to establish and promote the culture of ethical management and CSR.

5. CHANNEL TO RESOLVE COMPLAINTS, CLAIMS, COMPLAINTS OR SUGGESTIONS

There is the Integral Management Committee which ensures compliance with the Code of Conduct, all people may contact it in order to resolve complaints, claims, complaints or suggestions by issuing PQRS cards of code IN-AZD27-F11.

All communications received by the Committee, including complaints of ethical misconduct or breaches of the Internal Regulations or the Code of Conduct, are confidential, and are not disseminated to any other person or part of the organization. This communication channel is also used to inform the Committee about bribery or extortion proceedings, which will be adequately dealt with.

The communication of complaints may result in the application of sanctioning measures that will be applied to the activity or aspect of the management that has caused said breach, but will never be applied to any person. Finally, the Ethics Management Committee can also make internal communications, when it is necessary to disseminate relevant information to the company's personnel, and this must be recorded.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

6. SANCTIONING MEASURES.

The Ethics Management Committee analyzes the communications received related to ethical faults, conflicts of interest or breaches of the Code of Conduct (whether complaints or doubts about its results).

From the result of this analysis, and in agreement with the Management, it decides the application of sanctioning measures that are communicated to the staff.

These sanctioning measures are applied on activities, processes or aspects of the management of the company, giving them the consideration of non-Conformity and, therefore, defining the most appropriate Corrective Actions in each case. Through the application of these actions, it is possible to continuously improve the management of the company in each of the ethical principles contained in this code of conduct.

7. COMMUNICATION AND DISCLOSURE

All employees and people who work on behalf of INSURCOL, must know this Code of Conduct, and comply with it. To this end, the Ethics Management Committee has defined the following methods of distribution or dissemination of the code:

On the page WEB

The Code of Conduct is published on the company's website. In this way, it is available to all interested internal and external people. In this case, there is no record of the dissemination, since it is public.

In induction proceeding:

When a Worker performs the Induction process, this code is made known, delivered and evaluated to ensure its understanding.

By Email.

The Committee may send the Code of Conduct to the person or persons concerned by e-mail, attaching the document to the mail sent.

Paper copy

In the quality office rests a paper copy, to facilitate the consultation of the interested parties.

8. COMPLIANCE WITH THE CODE OF CONDUCT

All Coordinators and Assistants are responsible for ensuring compliance with the Code of Conduct by the people in their charge, they must also give an example of the compartment through their own conduct, in case of non-compliance with this code will proceed to take the respective disciplinary measures in accordance with the provisions of the Internal Work Regulations of the company.

CODE OF CONDUCT			<DOCUMENT NAME>
<DOCUMENT CODE> IN-AZD26	<DATE LAST REVIEW> 28/04/2023	<REVIEW STATUS> 17	

9. VALIDITY AND APPROVAL

This code will enter into force from the day of signature of the same by the Management of the Company. Any adjustment or modification of this will be governed within the guidelines for the management and control of the documents belonging to the management system.



ALVARO GONZALEZ RODRIGUEZ
General Manager

COPIA CONTROLADA OCT