



POLICY ON GIFTS AND COURTESIES

AS-005

Contents

POLICY ON GIFTS AND COURTESIES	3
1. INTRODUCTION.....	3
2. OBJECTIVE.....	3
3. RULES	3
4. DOUBTS OR INAPPLICABILITY	5
5. INFRACTION REPORT	5
6. SCOPE.....	5
7. STAKEHOLDERS	6
8. RESPONSIBLE PARTIES FOR CONTROL AND APPROVAL	6
ANNEX No. 1 GIFTS, COURTESIES AND OTHER BENEFITS REGISTRATION FORM.....	7

POLICY ON GIFTS AND COURTESIES

1. INTRODUCTION

This object of this policy is to regulate the giving and receiving of gifts and courtesies as stipulated in the Code of Conduct and the measures set out in the Risk Management System for Fraud, Bribery and Corruption (SARFC for its Spanish acronym).

The giving and receiving of gifts and courtesies in business is a common way to strengthen business relationships and, with some restrictions, it is a legitimate practice, provided that it conforms to the internal regulation and ethical principles and the Law.

2. OBJECTIVE

The main objective of this policy is to establish the broad action parameters that must be followed in order to minimize the emergence of situations related with the risks of Fraud, Bribery, and Corruption, arising from the giving and receiving of gifts and courtesies.

3. RULES

3.1 GENERAL

1. We do not offer, accept or solicit gifts or courtesies if they are understood as or seem to be understood as an obligation or a bribe.
2. We do not offer, promise, pay or authorize payments, directly or indirectly, to influence the decisions of any government official, authority or any other third party¹.
3. We do not offer, accept or solicit gifts and courtesies in exchange for granting any advantage or ignoring any procedure for or against a third party.
4. We do not offer, accept or solicit gifts or courtesies when a decision is pending or may affect the judgment of a third party
5. Under no circumstances will we receive cash or its equivalent.
6. Before accepting gifts and courtesies we will verify that they are reasonable in cost, frequency and quantity.

¹ Third parties are all those individuals or corporations who have or can have a relationship with Grupo Odinsa, including but not limited to: customers, suppliers, brokers, consultants, authorities, counterparts, etc.

7. We will refuse all gifts or courtesies that do not meet the parameters set forth herein.
8. We do not offer, accept or solicit gifts and courtesies more than twice in a calendar year, from the same third party.
9. We discourage third parties who offer us gifts and courtesies.

3.2 RULES FOR ACCEPTANCE

We can offer or accept gifts and courtesies in relation to our work in Grupo Odinsa, provided they comply with the following rules:

3.3. IN CASE OF COURTESIES:

- We always attend the event in the company of the third party.
- We verify that the expense involved is reasonable for this type of event.
- In the case of a trip, inside or outside the place of residence, it must exclusively relate to a commercial purpose for the Group and the express written authorization of the immediate supervisor must first be obtained, who in turn will report the case to the Compliance Manager.
- We will only accept courtesies that do not involve activities, products or places that may embarrass or be considered distasteful by the recipient, affect the reputation of Grupo Odinsa or violate its ethical principles.

3.4. IN CASE OF GIFTS:

- We will only accept institutional gifts, gifts of symbolic value, or gifts which based on a reasonable assessment, can be estimated to have a value equal to or less than USD \$ 100.
- We do not receive gifts which may be considered in bad taste or which violate the ethical principles of Grupo Odinsa

3.5. PROCEDURE

- Every time we receive a gift, courtesy or any other benefit, we must report it in writing to the Compliance Department by means of the Gifts, Courtesies and other Benefits Registration Form (Annex 1).
- In the event that we receive gifts or courtesies above the maximum amount allowed, we must immediately inform the Compliance department, in order that in conjunction with the Compliance Officer and Internal Audit they determine the course of action.

- In general terms, the return of the gift or refusal of the courtesy by means of a cordial communication is preferable, in line with the communication established by the Compliance Department to that effect.
- In cases where the return of the gift may affect the relationship with the third party or it is impossible, the gift will be donated to the Foundation for its benefit and a communication will be sent to the third party notifying him/her to that regard.

3.6. RULES FOR GRANTING GIFTS

- We always respect our level of authority for extending invitations or granting gifts to third parties
- The gifts and invitations offered must be reasonably priced, according to our good judgement.
- We always respect the gift and courtesy policies for the third parties to whom they are intended

4. DOUBTS OR INAPPLICABILITY

In case of doubt as to the feasibility of receiving or offering gifts or courtesies, or if it is not possible to apply the parameters set here, we must immediately report this to the Compliance Officer for resolution.

Depending on the relevance of the situation and after carrying out the respective evaluation, the Compliance Officer shall refer the situation to the Business Conduct Committee.

5. INFRACTION REPORT

If you observe any violation of this policy, it should be immediately reported to the Compliance Department or the Transparency Line.

Failure to comply with this policy will generate the penalties established in the Code of Conduct.

6. SCOPE

This policy applies to all Employees, Administrators, Shareholders, Directors, Suppliers, and Associated Third Parties of Grupo Odinsa S.A.

It is the duty of the Vice Presidents to implement the necessary measures for the adoption of this same policy by affiliates and subsidiaries

7. STAKEHOLDERS

The following are those directly involved with whom the necessary activities need to be secured for this policy to be realized:

- Compliance Director
- Compliance Officer
- Vice Presidents
- President
- Internal Audit
- Conduct Committee
- Audit Committee
- Board of Directors

8. RESPONSIBLE PARTIES FOR CONTROL AND APPROVAL

This policy may be updated upon the recommendation of the Conduct Committee.

The Conduct Committee will review this policy whenever it deems necessary and propose any amendments it deems appropriate.

ANNEX No. 1 GIFTS, COURTESIES AND OTHER BENEFITS REGISTRATION FORM

Fecha	Área	Nombre colaborador	Cargo	Nombre de la contraparte (empresa y funcionario)	Descripción del regalo o atención	Valor aprox. en pesos	Se aceptó S/N	Comentarios	Vo Bo jefe directo	Vo Bo Dir. cumplimiento

Observaciones Generales

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