

Code of ethics



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1.

This is us in Ceiba



1.1. Business values



- We are innovative problem-solvers.
- We value the unique potential of each individual and recognize the importance of work-life balance to support personal and family well-being.
- We are committed to continuous learning and growth.
- We build trust and create value through open collaboration with our customers.

1.2. Business principles



Honesty and transparency.

Our actions are consistent with our thoughts and feelings. We promote a culture in which individuals can respectfully express differing viewpoints, fostering a culture of constructive dialogue while always respecting the recipient of the message.

Equality.

No one shall be discriminated against on the basis of gender, race, national or family origin, language, religion, political or philosophical beliefs. Employees, directors, suppliers and shareholders will be treated with courtesy regardless of their relationship with the Company.

Legal Compliance.

Ceiba is committed to maintaining the highest standards of legal integrity. We strive to ensure that all of our activities are lawful and encourage all individuals who have a relationship with Ceiba to ensure that their actions comply with the current legal framework.



1.2. Business principles



Responsibility.

We are committed to acting responsibly by making conscious decisions, assuming accountability for the outcomes, and answering to those responsible.

Respect.

Treat others with special consideration and appreciation, as the social value of others is recognized.

Cooperation.

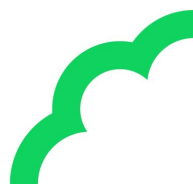
Ceiba employees collaborate towards shared objectives, leveraging individual strengths, and fostering a cooperative environment.



1.3. Our mission



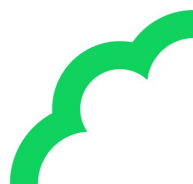
At Ceiba, we are passionate about transforming our clients' businesses. We want to make them more successful through the use of technology and innovation.



1.4. Our vision



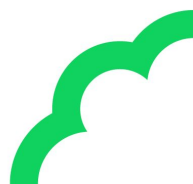
Ceiba will be the preferred choice for clients and top talent.



1.5. Identity and purpose



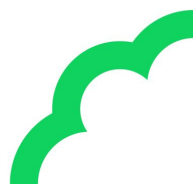
Ceiba is a Colombian software development company headquartered in Medellín, Antioquia. We partner with our clients to transform their businesses by delivering custom software solutions tailored to their specific needs. We are committed to understanding our clients' unique challenges and exceeding their expectations.



1.6. How are we at Ceiba?



At Ceiba, we are innovators, creating comprehensive solutions and always striving to provide exceptional service that drives our clients' business growth. Our interactions with employees, management, suppliers, shareholders, customers, and other stakeholders are guided by our commitment to human dignity and mutual respect. Transparency is at the heart of everything we do. We are committed to conducting our business in full compliance with all applicable laws and regulations. We work closely with our clients to develop customized solutions that are perfectly aligned with their goals. We expect all employees, at every level, to behave in a way that aligns with our company's core values and supports our mission and objectives.





2.

Implementation of our
corporate code of ethics



2.1. Scope



This Code of Ethics is designed to promote and safeguard Ceiba's corporate values and principles. Our goal is to foster trusting, sound, and sustainable relationships with all stakeholders, including employees, management, suppliers, shareholders, customers, and other third parties.

Therefore, the Code of Ethics serves as a personal and professional conduct guideline, steering us towards actions that embody integrity, making us proud as a company, and always driven to create value. In Ceiba, we conduct ourselves ethically. We act responsibly, transparently, and impartially, adhering to our company's policies and public administration regulations. As a result, we always evaluate the rightness and responsibility of our actions before proceeding.

Before undertaking any activity, we conduct a thorough assessment of its potential impacts on Ceiba, our shareholders, employees, suppliers, and customers. We verify compliance with all legal regulations and internal policies, including our Transparency and Corporate Ethics Program and risk management systems. If we identify any risks or negative impacts on any stakeholder, the activity will not be carried out.

3.

Protection of our assets
and interests



3.1 Proper management of external relationships and activities



At Ceiba, our roles as Managers or collaborators do not grant us any preferential treatment or special privileges. We only benefit from the same opportunities as other Managers or collaborators, as long as we have Ceiba's explicit authorization.

We understand that we cannot perform the same work that we perform under our employment contract as a remunerated occupation for third parties, even outside of working hours.

Ceiba employees may hold partnerships or associations in external companies, as long as these activities do not conflict with our job duties and are unrelated to Ceiba's business. Such activities must be undertaken during our personal time and require prior approval from Ceiba's Compliance Officer, with the support of the Legal Representative, in cases where there is a potential conflict of interest.

Employees must disclose any involvement in governing bodies of other organizations, particularly boards of directors. Board positions with competitors are prohibited. Involvement in non-profit or university governance is permitted, subject to conflict of interest rules. Employees must also disclose any management or representative roles in family businesses that are not Ceiba customers, suppliers, or competitors.



3.2. Responsible use of information



Recognizing that information is a valuable corporate asset, we have read, understand, agree to, and will abide by Ceiba's Privacy and Data Processing Policy. Consequently, we commit to protecting Ceiba's confidential information at all times, both during and outside working hours, and even after the termination of our employment.

We maintain the confidentiality of Ceiba's information and do not disclose it to third parties, including our co-workers, except as necessary for business purposes. We avoid discussing issues related to Ceiba's confidential information in public places or with outsiders. In addition, we agree not to engage in or encourage transactions for our own benefit or for the benefit of third parties using privileged information to which we have access by virtue of our position.

We are committed to upholding the highest standards of financial integrity. This means ensuring that all of Ceiba's financial records are accurate, complete, and reliable. Our financial reports are prepared in accordance with Colombian accounting standards and our internal policies.

We pledge to never falsify, destroy, or alter any financial documents. Any such action is strictly prohibited and will not be tolerated.



3.3. Management of corporate records



The Company shall maintain accurate, complete, and timely records in accordance with all applicable laws and regulations. The integrity of our books and records is paramount to preserving our reputation. Ceiba maintains comprehensive records that accurately reflect all of our business activities. This ensures that we provide our shareholders and the public with transparent and reliable financial reporting. Furthermore, the Company maintains accurate, complete, and timely non-financial records, including cost records, sales data, expense reports, payroll and benefit records, regulatory filings, contracts, and procurement records.

3.4. Acceptable use and privacy of networks, systems, and electronic communications.



We are responsible for using Ceiba's electronic systems solely for business purposes. We understand that our activities on these systems are subject to monitoring and are not private.

Acceptable use policy: Our company's systems are intended for business use only. While we recognize that we may have limited use of these systems for personal purposes, as long as they are lawful, it is important to remember that such use must not interfere with our job responsibilities, cause inconvenience to our fellow employees, or interfere with our overall business operations. Under no circumstances should Company systems or equipment be used for such purposes:

A _____

Engaging in business activities that compete with or are unrelated to the company.

B _____

Introducing malicious programs into a Ceiba network or server (e.g., viruses, worms, Trojan horses).

C _____

Gambling for money.

D _____

Harassing, intimidating, or making discriminatory or defamatory comments about others.

E _____

Creating, sending, accessing, downloading, or storing sexually explicit, abusive, offensive, or immoral material.

F _____

Violating the company's copyright, trade secret, patent, or other intellectual property rights, or those of a third party.

G _____

Engaging in any other activity that violates applicable law, other company policies, or that could expose the company to liability or harm.





Privacy:

Please note that your use of company systems is subject to monitoring. The company reserves the right to monitor, record, and review all system activity, including making copies of any data processed or stored on company systems.

The Company may monitor system use to protect its legitimate interests, including conducting investigations, complying with legal obligations, preventing unauthorized access, or preserving records. Unless required by law, you will not be notified in advance of any monitoring activities.

Personal systems:

There are restrictions on the use of personal systems to conduct the company's business activities.

3.5. Security of company property



To protect company assets, appropriate security measures are in place to prevent theft. Unauthorized or excessive use of company property is strictly prohibited.

Theft or misuse of company property can take many forms, including the following:

- Unauthorized use of Ceiba logos, trademarks, or other proprietary information, trade secrets, inventions, copyrights, or other intangible business assets.
- Theft of supplies, equipment, documents, cash, or other tangible property.
- Misuse of company credit cards or purchasing cards.
- Personal gain at the expense of the company from dealings with customers, suppliers, or other business associates.
- Removing company property from the premises without proper authorization.
- Damaging company property through negligence or willful misconduct.
- Using company resources for personal gain or benefit.
- Excessive use of telephones, computers, copy machines, company systems (including network or wireless access), or other equipment for non-business purposes.
- Submitting falsified or altered expense reports.

3.6. Copyright, intellectual property, and confidential information



At Ceiba, we are committed to protecting copyright, intellectual property, and confidential information with the same care we take to protect our other company assets. Accordingly, we handle confidential information, including valuable trade secrets, in accordance with applicable law.

Some examples of the type of information that is considered confidential and may be a trade secret include:

- Customer relations and pricing plans.
- Projections.
- Services under development.
- Acquisition or divestiture prospects.

All documents, files, records, and reports generated during the performance of our duties are the exclusive property of Ceiba. As collaborators, we are not permitted to access or remove such material from the company's premises unless we have the corresponding authorization.





Additionally, all proprietary rights that may vest in the software or any other copyright protected by law, developed by the Employee, individually, collectively, or in collaboration, shall be the property of Ceiba and shall be considered its assets. Therefore, neither during the term of the employment contract nor after its termination may the information related to the software or the software itself be used or removed from Ceiba's premises for the employee's own benefit or that of third parties, without the respective written authorization of Ceiba's Legal Representative.

In the event that we are involved in acquisitions or other sensitive commercial transactions, we may be required to sign a non-disclosure agreement to safeguard the related information.

On certain occasions, we have access to intellectual property or confidential and restricted information belonging to third parties. This may include information or materials licensed and protected by copyright that are learned during a potential acquisition. We only copy and use this information if its use complies with applicable laws and the agreements established with its rightful owners.

3.7. External information requests and notification of legal proceedings



If we receive any communication from a third party (other than our legal representatives, government agents, or entities such as competitors, former employees, or customers) seeking information or documents related to potential or ongoing litigation or investigations involving the company, it is imperative to immediately notify our department manager. This notification is required even if the request is not directly related to us.

If we receive a subpoena or other legal document requiring our presence or a response within a specific timeframe, it is crucial to act promptly. The legal department will assess the matter, determine the appropriate response, and provide guidance to the employees involved. Employees are expected to cooperate fully with the legal department in responding to such requests. In the event that we receive a subpoena, summons, or other legal document requiring our presence or a timely response, swift action is crucial.

Employees must preserve any relevant documents or information related to the legal matter. The legal department will comprehensively evaluate the matter, determine the most suitable course of action, and provide clear guidance to the involved employees. All employees are expected to fully cooperate with the legal department, maintaining the confidentiality of the matter throughout this process.

3.8. False statements and fraud



The credibility and reputation of our company rely heavily on the accuracy of our records, books, and statements. Any attempt to defraud clients, suppliers, shareholders, auditors, or any other individuals or entities with whom we interact or conduct business is strictly prohibited. This includes making false or misleading statements, whether verbal or written, and the deliberate or reckless dissemination of false or misleading information regarding our services, financial condition, policies, security, privacy, or compliance practices.

If we, as employees, communicate with Ceiba's internal or external auditors, it is crucial to provide them with all the necessary information for the preparation of audit reports. Furthermore, we must correct any apparent misunderstandings or misinterpretations of such information before the corresponding reports are published.

3.9. Advertising content and service promotion



All advertising claims and other statements, whether in print, electronic or non-print media, must be truthful and have a reasonable basis. Solid foundations are necessary before publishing or disseminating any information. This also applies to oral presentations or even informal conversations in which objective, concrete or quantifiable comments are made about our services, as well as those of other companies.

Any of this content must be reviewed and approved by the Digital Area, as it will be responsible for verifying that the piece complies with these guidelines and also that it fits the company's brand.

3.10. Use of social media



Social media platforms and services play a fundamental role in the growth of our brand, the promotion of our services, and building relationships with our current and potential customers. However, when using social media, it is important that we follow the following guidelines:

- It is fundamental that we act with personal integrity and take responsibility for our actions;
- We must respect the intellectual property rights of both Ceiba and third parties;
- We can only make legal statements or speak on behalf of Ceiba with the appropriate authorization.

These guidelines apply to company-sponsored social media activity, but they also apply to our personal use of social media when:

- We identify ourselves as Ceiba associates;
- We post about our work at Ceiba, our services, or competitors; or
- We communicate with other associates, clients, agents, suppliers, or other third parties related to Ceiba.

As associates, we must be mindful that we cannot make public statements on behalf of Ceiba that contain comments or information about the company's business, strategies, or financial results in the media, to financial or industry analysts, external consultants, online chats, industry associations, academic events, or other audiences, without the prior authorization of Ceiba's Legal Representative. We must be aware of our limitations and act in accordance with this guideline. The company has established a digital risk matrix that can be consulted at the following link:

[Matriz de riesgo digital →](#)



3.11. Participation in political activities



We are allowed to participate in political activities on a personal or union basis, provided that we comply with the following requirements:

A

That our participation is carried out within the limits of the law.

B

That we do not use Ceiba's name or resources.

C

That it occurs during our free time.

D

That our job performance or the company's operations are not affected in any way.

3.12. Proper use of company property



We acknowledge that the assets provided by Ceiba are the exclusive property of the company and therefore we ensure that it is protected and used in accordance with company policies, received instructions, and manufacturer's manuals. We commit to neither permitting nor participating in any activity involving Ceiba's assets that could constitute fraud.

Furthermore, we commit to preventing waste, loss, or misuse of Ceiba's assets. We will adopt a sustainable approach to resource utilization, prioritizing environmental protection in all our activities. We are readily available to cooperate with any audits or controls designed to ensure the proper stewardship of company resources.

It is essential to recognize that all designs, developments, software, names, trademarks, or any other tangible material created during the performance of our duties are the exclusive property of Ceiba. We are not authorized to use them to provide services to third parties. Our commitment lies in protecting the company's assets and ensuring that they are not misused.





4.

Data protection

4.1. Personal data protection and privacy



Personal information refers to data that can be used to identify an individual, including their name, address, phone number, government-issued ID, or other unique identifiers. In conducting our business, we may gather, retain, and utilize personal information from our clients, vendors, partners, job applicants, and stakeholders.

It is paramount that others trust us when sharing information that helps us provide high-quality services. We value the trust placed in our company and are committed to protecting the privacy and security of your information at all times.

To that end, we, as employees:

- Adhere to all applicable laws and company policies related to the protection and use of personal data;
- Are only authorized to collect, process, use, disclose, or store personal data when there is a legitimate business need and appropriate notice has been provided;
- Strictly follow all company policies regarding the classification, collection, processing, use, disclosure, storage, transfer, and secure disposal of personal information. We treat all personal data with the utmost care and confidentiality.





5.

Ethical conduct in dealings
with customers, suppliers
and competitors



5.1. Fair and loyal competition



We are fully committed to free enterprise and rigorously comply with all laws related to competition, antitrust, and fair business practices.

We take great care to protect Ceiba's intellectual property and trade secrets. When participating in industry associations, we avoid disclosing any information that could compromise our competitive position.

At Ceiba, we will always promote free competition practices and avoid any action that limits our ability to compete freely, independently and autonomously.

We will refrain from entering into any agreements with competitors that could undermine fair competition. Additionally, we will not discuss with our competitors topics related to costs, prices, markets, or other issues that could unfairly affect competition. Our focus is to maintain a fair and ethical competitive environment in all our operations.



Generally, within the principles of economic competition, the following are prohibited:

- Discounts, rebates, profit margins, costs, or any other mechanism to set service prices, provided that these are aimed at engaging in unfair competition;
- Agreements to limit the production of any service;
- Collective boycotts, such as jointly deciding with a competitor whether or not to negotiate with any other company;
- Exchanging commercial information that is not public, or sharing with competitors trade secrets and commercially sensitive business information for the Company;
- Promoting or executing agreements and actions contrary to free competition;
- Entering into agreements to directly fix prices, terms of sale, or marketing.

5.2. Bribery



We are prohibited from offering, providing, or accepting any form of bribe, including but not limited to, gifts, favors, or financial advantages, with the intent of influencing business decisions in our favor.

Bribery is defined as the act of offering, promising, requesting, giving, or accepting something of value to induce a person in a position of trust to act in a certain way. This can include cash payments, gifts, entertainment, or other benefits.

It is important to note that most countries and local governments have laws prohibiting bribery and corruption, and some of these laws have extraterritorial reach. Therefore, it is crucial to comply with these regulations to avoid serious legal consequences, such as fines and imprisonment, for both corporations and individuals involved.

To comply with anti-bribery laws, it is essential to avoid making improper payments, directly or indirectly, to another business party, a customer, a customer's representative, a government employee or official, or receiving improper payments from them. We must also maintain accurate records of payments to ensure that they are made honestly and are not used for illegal purposes.



5.3. Gifts, entertainment, and invitations



Bribery laws also restrict the offering or giving of gifts, entertainment, or gratuities, especially to government officials or employees. Therefore, we do not solicit, accept, offer, or provide gifts or entertainment that could or appear to influence the ability to make objective business decisions.

Occasionally, in the performance of our assigned duties, we accept gifts or invitations, provided that they are not in exchange for granting any advantage or overlooking any procedure in favor of a client, supplier, or authority, or that they compromise our objectivity and good judgment.

In any case, these gifts must be institutional, of symbolic value, and in no case may they exceed a value of COP\$200,000 or its equivalent. If we have doubts about the nature of a gift or attention, we can consult with Ceiba's Compliance Officer.



In no case do we accept gifts in cash or its equivalent, regardless of their value. Consistent with these same criteria, we provide gifts, invitations, or entertainment to our Clients, Suppliers, or Authorities, respecting the authority granted to us based on our level at Ceiba and using our best judgment to set a reasonable cost. If we receive a gift that is not institutional and whose value we believe could compromise our objectivity in decision-making, we must return it immediately. If for any reason it cannot be returned, the gift must be sent to the Company's Compliance Officer, notifying the giver and our supervisor that in compliance with our ethical guidelines we will not use the gift.

Gifts exceeding the nominal value, frequent gifts or entertainment, or entertainment that is more than a normal social courtesy may appear to be an attempt to influence us or the other party. Our policy aims to prevent bribery and even the appearance of bribery with clients, consultants, suppliers, and other current or future business partners. In addition to this policy, we follow the strictest standards required by the businesses we are part of or our individual management.

5.4. Contract execution



All agreements entered into by Ceiba must be documented in writing. It is important to remember that only the Legal Representative of the company has the authority to enter into any type of agreement. No other employee is authorized to sign any agreement on behalf of the company.

Furthermore, to terminate an agreement before its expiration, the direct approval of the Legal Representative is required. The Legal Representative will make the decision and sign the necessary documents. This measure is based on the understanding that even agreements with seemingly modest sums can generate indemnification commitments or other contractual liabilities.

6.

Working at ceiba



6.1. Selection and recruitment



At Ceiba, our selection and recruitment processes are based on candidates' abilities, experience, and knowledge, as well as their alignment with our company's principles and values. The process is conducted with respect and equality, without creating false expectations for candidates and in compliance with all relevant laws and regulations.

6.2. Fair working conditions



We strive for an environment of equity and fair compensation. We care about the health, safety, dignity, reputation, and integrity of all our employees. We reject all forms of discrimination for any reason, value diversity, and promote the exchange of viewpoints and ideas in a respectful and constructive manner.

Our commitment to employee well-being is unwavering which is why we guarantee fair and humane working conditions. Consequently:

- We do not support or tolerate discriminatory or forced labor and ensure that the rights of our employees are fully recognized.
- Our hiring and compensation system is governed by principles of equity and social responsibility, valuing the individual qualities of each member of our company.
- We respect and safeguard the privacy and reputation of our employees and their families.
- We defend the right to freedom of expression for our employees.



6.3. Non-discrimination and harassment



We maintain a work environment based on equal opportunities. We are firmly committed to treating all employees and candidates with respect and dignity, with no room for discrimination. Our recruitment, hiring, development, and promotion processes are guided by this principle, regardless of characteristics such as race, religion, nationality, gender, gender identity or expression, sexual orientation, marital status, age, or disability.

We do not tolerate any form of harassment, including sexual harassment and any type of harassment based on the characteristics previously mentioned. We understand that harassment can manifest itself verbally, physically, visually, or through any other behavior that creates an offensive, hostile, or intimidating environment. In any case, the Coexistence Committee will be responsible for receiving and managing these complaints.

Similarly, if any employee feels violated by offensive jokes or comments of a racial, ethnic, religious, age-related, or sexual nature, they may activate the Coexistence Committee to open a case. We do not tolerate the dissemination or exposure of offensive visual material, such as photos, videos, or cartoons, nor the use of electronic media such as voicemail, instant messaging, or email to transmit information that is derogatory or discriminatory.



6.4. Occupational safety and health management system



At Ceiba, we are committed to the health and safety of everyone who is part of our company. To achieve this, we have a comprehensive Occupational Safety and Health Management System. Through a thorough evaluation of the risks associated with our activities, we have designed preventive programs for accidents and illnesses. In addition, we carry out regular audits to ensure the effectiveness of our safety procedures.

We follow and strictly comply with existing regulations in this area, which guide us in the implementation of processes and systems for the prevention, treatment, and monitoring of work accidents and illnesses. Our highly trained personnel in occupational safety and health risk management provide training on risks, and constantly supervise the application of prevention policies and the analysis of accidents and incidents. Our focus is to achieve continuous improvement in the safety and health of our employees, both in our facilities and for those who work remotely.



7.

Relationship with our
stakeholders



7.1. Ceiba shareholders



We guarantee equal treatment to all our shareholders, regardless of their percentage of ownership in the company. Our priority is to protect their investment and to continually strive to generate a sustainable, long-term return on all aspects of their investment.

7.2. Ceiba shareholders' meeting



Ceiba's Shareholders' Meeting is committed to pursuing the general interest and fostering a culture rooted in transparency and integrity, where Transnational Bribery and Corruption in general are considered unacceptable. This will ensure that our company operates in an ethical, transparent, and honest manner, and is prepared to identify, prevent, and mitigate the risks associated with Transnational Bribery and other corrupt practices.

In the same way, they undertake the following responsibilities:

- Rigorously enforce compliance policies and the Corporate Code of Ethics.
- Provide guidance on structuring, executing, and monitoring actions to prevent bribery and corruption.
- Be committed to preventing bribery and corruption, ensuring ethical, transparent, and honest operations.
- Ensure the Compliance Officer has the necessary financial, human, and technological resources.
- Take appropriate action against directors and employees with management functions, in the event of an act of corruption or transnational bribery.



7.3. Ceiba employees



As Ceiba employees, we cultivate relationships marked by courtesy, mutual respect, and a strong spirit of collaboration and teamwork, always in the name of our loyalty to the company.

Within Ceiba, we maintain a deep respect for our employees and are actively committed to safeguarding their labor rights. Our priority is to ensure the health and safety of every member of our team.

In line with our commitment to inclusive and discrimination-free work environments, at Ceiba we foster diversity, grounded in the respect and inherent dignity of every individual employed in our organization.

7.4. Our Suppliers



We ensure objectiveness in our supplier selection processes, prioritizing quality and excellence criteria to identify the best fit for our needs. Our supplier selection policies respect the principle of fair competition.

We are confident that our relationships with suppliers will remain grounded in integrity and honesty, demanding a high level of commitment to our business ethics standards.

7.5. Our clients



As Ceiba employees, we are committed to providing a service of the highest quality, with professionalism and respect. Customer complaints and claims will be addressed through the organization's established channels in an appropriate manner, seeking to meet their needs fairly.

Our interactions with customers are based on the values of seriousness, professionalism, integrity, and equity. We are committed to ensuring customer satisfaction, respecting their rights, and seeking solutions that meet their needs.

We develop transparent and honest market strategies, where customers can understand their rights and responsibilities without any deception.



7.6. Government entities



We demand the highest standards of professionalism, reliability, and ethics from those employees who have relationships with government entities. It is imperative that they act in strict compliance with current laws. We uphold the authority and decisions of government agencies. Whenever government agencies make adverse decisions to our interests, we are committed to defending our rights through legal means.

Under no circumstances do we exert undue influence on government officials, nor do we engage in practices that are not fully aligned with the law. We categorically reject the offer of cash payments or any type of benefit to obtain favorable decisions from a government official.



8.

Transparency principles at Ceiba



8.1. Transparency and impartiality



At Ceiba, we adhere to the highest standards of transparency and impartiality in all our operations. We neither offer nor promise favors or advantages, directly or indirectly, to secure business, permits, or other benefits from individuals or authorities. We neither seek nor accept any special treatment or preferential arrangements that would compromise our ethical standards.

We do not engage in any activities that could be construed as bribery, whether at the national or international level. We are not involved in the promotion, financing, or support of illegal armed groups, and we are always committed to respecting human rights. We also do not participate in or promote activities that could be related to money laundering, terrorist financing, or activities of criminal organizations.



8.2. Legal compliance



We adhere to all laws, regulations, and standards applicable to Ceiba. Furthermore, we demand the same level of conduct from our clients, suppliers, and all business partners.

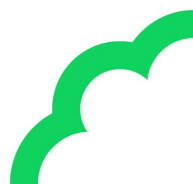
At Ceiba, we promote reliable, honest, constructive, appropriate, and socially responsible behavior. In this regard, we categorically reject:

- Racism and any form of discrimination
- Child labor exploitation
- Corruption and fraud in all its forms
- Workplace harassment
- Any illegal or illicit activity.

8.3. Financial reporting



At Ceiba, we are committed to providing our shareholders, regulators, and the market with accurate and transparent information about our operations. Therefore, all employees must contribute to ensuring that financial statements, tax returns, and other financial records reflect the true economic reality, whether through reporting information or applying appropriate controls. Likewise, we comply with all national laws related to financial and tax reporting, ensuring the recording, preservation, and preparation of financial reports in accordance with applicable guidelines.



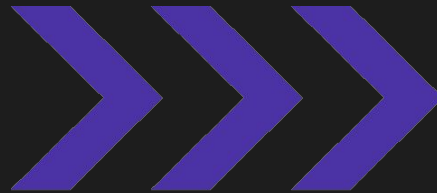
8.4. Internal audit



We maintain a robust internal audit function to ensure compliance with our company's policies and procedures. We will carefully select individuals with the appropriate profile and competencies to carry out this role.

9.

Conflicts of interest



9.1. Conflicts of interest



A conflict of interest arises when a decision involves a personal, professional, or financial interest that could benefit us as employees, our family members, or related third parties, either directly or indirectly. This could compromise the objectiveness of the decision and potentially harm Ceiba's interests.

In identifying conflicts of interest, we will assess the potential impact on our personal or a third party's financial interests. Whenever there is doubt or a potential conflict, we will refrain from taking action and will disclose the conflict of interest.

We are committed to acting with impartiality. Accordingly, we will not use our position for personal or familial advantage, nor will we allow personal relationships to influence our decisions. Our primary duty is to serve the best interests of Ceiba.



9.2. Situations subject to review



All employees must treat third parties fairly, loyally, and equitably. The following situations will be considered subject to review to determine if a conflict of interest exists:

- Conducting business negotiations with client or prospect representatives where there is a blood or sentimental relationship that could interfere with decision-making.
- Receiving Ceiba Coins as a result of a candidate's referral, when employees are involved in the recruitment process.
- Participating as an employee in selection processes where a family member or friend is a candidate.
- Selecting suppliers or contractors where there is a blood or sentimental relationship that could interfere with decision-making.
- Participating in a production project where there is a blood or sentimental relationship with the client's assigned representative that could interfere with decisions or actions taken.

9.3. Managing conflicts of interest



Should an employee, administrator, shareholder, contractor, or officer become involved in, or become aware of, any potential conflict of interest, they must immediately notify their immediate supervisor. The individual must provide a full and detailed account of the situation, including any supporting documentation, and furnish all relevant information necessary for a decision. By doing so, the individual can recuse themselves from the matter and avoid acting favorably or unfavorably in relation to it.

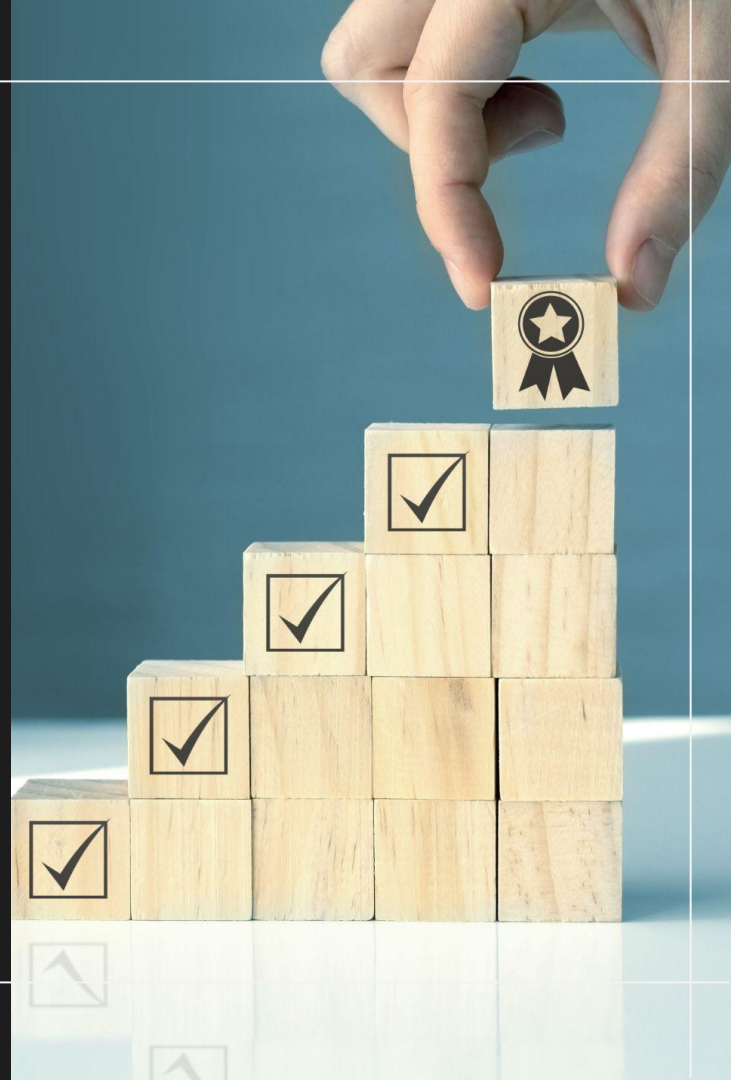
Such an employee must complete this conflict of interest form, which is accessible only to the Compliance Officer <https://forms.gle/vqEbAH7Svg0AEzYb9>

The Compliance Officer, in conjunction with senior management, will determine how to manage the potential conflict. They will assess whether the conflict is temporary or permanent in nature. In the case of a permanent conflict, they may assign another employee to continue with the respective process or activity.



10.

Adherence to this code
of ethics



10.1. Effective implementation and compliance with this code



The effective implementation and compliance with this Code is the responsibility of the Shareholders' Meeting, the Legal Representative, and the Managers of Ceiba's various departments. The overall supervision of the implementation, monitoring, and maintenance of this Code is the responsibility of the Compliance Officer appointed by the Company's Shareholders' Meeting.

Given Ceiba's commitment to transparency and appropriate conduct from all members of the organization, we maintain a zero-tolerance policy for fraud. Any violation of this Code of Ethics will be considered a serious breach of the Company's Internal Regulations and our employment obligations. Depending on the severity, this could even result in termination of employment in accordance with the company's disciplinary procedures.



10.2. Procedure in the event of violations of this code



In the event that a situation is identified that violates this Code of Ethics, the following procedure will be followed:

A _____

Conduct of a preliminary investigation of the facts,

B _____

Disciplinary action will be taken against the employees involved,

C _____

Severe violations may result in termination of the contract,

D _____

Report to the competent authorities.

Aligned with our commitment to integrity and accountability, the Strategic Talent Management department will be responsible for managing this process.



Two magnifying glasses with black handles and frames are positioned on a dark brown wooden surface. One is slightly above and to the left of the other. In the bottom left corner, there are three blue chevron arrows pointing to the right.

11.

Complaints and investigations

11.1. Why report?



In the event that we have a suspicion about possible violations of the Code, the Law or Ceiba's policies, we must report it using any of the channels available for such purpose. It is fundamental to report any violation, regardless of who the alleged offender is or their position.

Thus, if we have information or suspicion of a violation of the Code or other immoral or illegal behavior, we will immediately inform our manager, the Strategic Talent Management or the Ceiba Compliance Officer. We can also use the company's ethics line **linea.etica@ceiba.com.co**.

While it is encouraged to identify yourself when reporting a suspected violation of Ceiba's Code of Conduct, we understand that some situations may require anonymity. You can submit your report confidentially.

Allegations will be promptly investigated, and appropriate action will be taken if necessary. This is essential to protect all Ceiba employees, maintain our reputation, and comply with legal obligations. Cooperation is highly valued.



11.2. Investigation of allegations



All allegations of violations of Ceiba's Code of Conduct or applicable laws will be thoroughly investigated. This includes anonymous reports. To carry out a complete and effective investigation, our collaboration and honesty as collaborators is essential. If an investigation reveals a violation, appropriate disciplinary action or other corrective measures may be taken in accordance with company policy.



11.3. Whistleblower confidentiality



Ceiba is committed to protecting the confidentiality of whistleblowers. We will keep this person's identity confidential unless they explicitly authorize us to disclose it, or when such disclosure is required by law, regulation, or court order, or if necessary to conduct a thorough investigation.



11.4. Whistleblower protection



Retaliation against any individual for reporting suspected misconduct, cooperating in an investigation, or opposing unlawful practices is strictly prohibited and constitutes a serious violation of this Code.

Retaliation may include, but is not limited to, threats, intimidation, harassment, or adverse employment actions. Any employee found to have engaged in retaliation will be subject to disciplinary action up to and including termination of employment.



Code Of ethics

