



Our CODE OF ETHICS AND CONDUCT

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INTRODUCTION

INTRODUCTION

CarboQuímica's fundamental pillar is to co-create through the values of service, innovation, excellence, and ethics, while respecting every living being and complying with Colombian and international laws.

¿What is CarboQuímica's Code of Ethics?

It is a compilation of guidelines containing the corporate principles and minimum standards of conduct that apply to all employees of the organization without exception.

This Code is not intended to cover every situation that may arise in the course of our daily work; rather, it seeks to serve as a framework of reference for taking actions and making decisions, since, as employees, we are responsible for fostering proper coexistence within CarboQuímica.

Message from the President



Dear Employees and Stakeholders,

At CarboQuímica, the Code of Ethics is our guide for conduct. It is framed within our Values and must serve as a guide for ongoing observance by everyone. The Code of Ethics is also the foundation upon which we build our relationships, both internal and external, and requires our commitment to transparency, honesty, and respect in all our actions.

My personal commitment to the Code of Ethics must be reflected in each of my actions and administrative decisions. Therefore, I invite each and every CarboQuímica employee to become familiar with, analyze, and assess these actions on my part, particularly those of all members of the Management Team, and to report to the appropriate higher authorities, through the

established channels, any irregular events, situations that have not been clearly explained, or circumstances that may result in non-compliance with the principles set forth in this Code.

Each of us, from the highest level to the most operational level, has a responsibility to adhere to these principles. Not only because it is the right thing to do, but also because it is essential to maintaining the trust of our customers, partners, suppliers, investors, and the community at large.

Compliance with the Code of Ethics helps us to:

- Foster a respectful and safe work environment: Where everyone feels valued and heard.
- Protect our company's reputation: By always acting with integrity and professionalism.
- Ensure the sustainability of our operations: By making ethical decisions that deliver long-term benefits.

I invite everyone to study the Code of Ethics and reflect on how we can apply it in our daily activities.

Kind regards,

PABLO CERÓN
President.

Objectives

1

Establish the fundamental principles and guidelines for legal practices that will guide CarboQuímica's ethical conduct in its relationships with our internal and external stakeholders.

2

Define responsibilities to ensure that our employees comply with and enforce internal regulations.

3

Raise awareness of the Ethics Line and promote a culture of reporting any conduct, non-compliance, or practice that does not adhere to the provisions of this Code and that may pose a risk to CarboQuímica and its employees.

Scope Of this code

Our Code of Ethics applies to all members of our organization: Shareholders, Board of Directors, employees, contractors, and all personnel acting on behalf of CarboQuímica.



This Code of Ethics is not intended to cover every situation that may arise in the course of daily work; rather, it seeks to serve as a framework of reference for best practices.



CARBOQUÍMICA CULTURE

Higher Purpose

““We co-create chemical solutions that contribute to the development of a more sustainable world.””



Strategic Objectives for 2028

Sales exceeding 106M by 2028.



Value-added and diversified portfolio: 15% of sales by 2028.

2028Internationalization: 40% of sales by.



Sustainability: Certifications and Portfolio.



CARBOQUÍMICA TALENTS

Corporate Values

Ethics

It entails an individual and collective commitment to act with respect, honesty, and transparency. Everyone must act responsibly, recognizing the boundaries of their role and promoting a culture of open communication and reporting misconduct.

Service

We maintain a close and ongoing relationship with our stakeholders, anticipating their needs and providing excellent service that contributes to the success of our organization.

Innovation

We believe in the importance of innovation to our success. Therefore, we foster a work environment where new ideas are welcomed and collaboration is encouraged to find creative solutions.

Excellence

We are committed to giving our best in everything we do, exceeding expectations and creating value for our organization. We foster a culture of continuous improvement, where discipline, proactivity, and teamwork are key to our success.



Your Rights

Our Active Commitment



Your Dignity Is Our Priority: We are committed to ensuring that every interaction is based on mutual respect and appreciation of your individuality.

01



A Work Environment That Empowers You: We provide fair working conditions, a safe and healthy environment where you can perform your duties, and work schedules designed to promote a balance between your professional and personal life.

02



We Grow Together with You: At CarboQuímica, investing in your development means investing in our future. We provide you with access to training and opportunities to help you reach your full potential.

03



Your Trust Is Fundamental: We foster a culture of open and respectful communication, where your voice is heard and your concerns are taken seriously.

04



your opinion. We will provide you with opportunities to participate in decisions that impact your work, recognizing that your experience and knowledge are essential to our collective growth.

05



Transparency and Access to Information: You have the right to receive clear and timely information about the policies, procedures, and decisions that impact your work and the operations of CarboQuímica.

06

Our Duties and Principles: The Commitment That Unites Us

1

Integrity and Transparency: Promptly report any irregularities to maintain trust and integrity in our work

2

Confidentiality and Professionalism: Protect company information responsibly and maintain its confidentiality.

3

Communication and Connection: Keep our contact information up to date to ensure we remain connected.

4

Proactivity and Care: Share observations to prevent problems and report incidents to promote everyone's well-being.

5

Collaboration and Solidarity: Actively support one another in situations of risk to protect people and the company's resources.

Basic Conduct

At CarboQuímica, our principles are the foundation of every action we take. They guide us in building a workplace characterized by integrity and responsibility:

- Act with integrity and in accordance with the law.
- Responsibly report any conduct that may harm CarboQuímica or those who work within the organization.

To ensure that our actions are aligned with our principles, we invite you to reflect before taking action.

ASK YOURSELF IF

? ¿Is it consistent with the provisions of this Code and our values?

? ¿Is it consistent with the organization's policies, procedures, and controls?

? ¿Is it ethical? ¿Is it legal?

? ¿Does it reflect a positive image of you and the Organization?

? ¿Is it something you would be comfortable seeing reported in the media?

Occupational Health and Safety

CarboQuímica is firmly committed to protecting the health and safety of its employees, neighboring communities, and business partners, acting responsibly to safeguard their well-being.



Find here everything you need to know about Occupational Health and Safety at CarboQuímica:



Sustainability



At CarboQuímica, **sustainability is a strategic pillar**. We prioritize environmental and social protection, aligning with the Sustainable Development Goals (SDGs) to innovate and provide sustainable solutions for our customers and future generations, **fostering a culture of responsibility** that integrates the **principles of sustainable development**.

We work directly and specifically with five Sustainable Development Goals:



In this way, our organizational sustainability strategy focuses on four main pillars:



Integrated Management System: A Commitment from Everyone:



Our Integrated Management System (IMS) is at the heart of how we operate. We do not view quality, environmental protection, occupational health and safety, sustainability, and supply chain security as separate areas, but rather as an interconnected whole that drives us toward exceptional performance.

Together, We Drive Our Integrated Management System

- **Quality:** Maintaining high standards in every task to ensure customer satisfaction and continuous improvement.
- **Environment:** Adopting sustainable practices to minimize our environmental impact and conserve resources.
- **Safety:** Following established protocols to ensure a safe work environment for everyone.
- **Sustainability:** Integrating principles to contribute to social and environmental development.
- **Supply Chain:** Ensuring quality and security at every stage, from beginning to end.



CARBOQUÍMICA ASSETS

Tangible Assets

Tangible assets are assets on an organization's balance sheet that have a physical form. Our assets may not be used for illegal or unethical activities.

Some examples of CarboQuímica's tangible assets include:



Money



Equipment
and Machinery



Inventories



Landline and
Mobile Phones



Vehicles



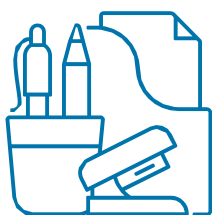
Photocopiers



Computers



Facilities



Office Supplies



Land

Intangible Assets

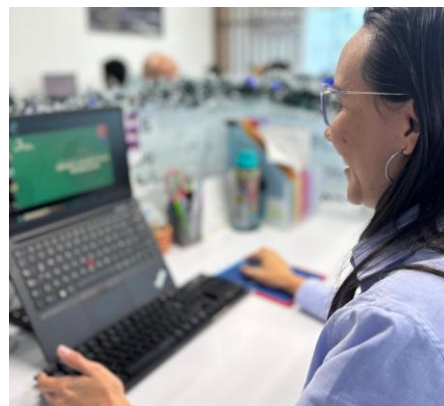
Intangible assets are identifiable assets, whether monetary or non-monetary, that have no physical form.

Some examples of CarboQuímica's intangible assets include:

- ✓ Organizational Information.
- ✓ Trademarks and Patents.
- ✓ Copyrights and Intellectual Property Rights in General.
- ✓ Business Records.
- ✓ Organizational Secrets.
- ✓ Corporate Email.
- ✓ Databases.
- ✓ IT Systems.

Use of Tangible and Intangible Assets

En At CarboQuímica, the resources provided by the company are valuable tools for our work and for achieving our shared objectives. Therefore, it is essential that we **use them responsibly and consciously**, using them only for their intended purposes.



¿How Do We Use Our Assets?

- **With Purpose:** CarboQuímica's assets are intended for work purposes, not for personal benefit or the benefit of third parties. Their use must always be aligned with our organizational activities and objectives.
- **With Care:** We must protect all company resources, safeguarding their value and proper functioning.
- **With Approval:** Any specific use of assets, especially those assigned exclusively, must have the appropriate authorization and be justified by the requirements of the role.
- **With Austerity:** We seek efficiency in the use of resources, avoiding unnecessary expenses and using them responsibly.
- **With Security:** We strictly comply with internal security standards and the applicable legal framework when using assets, protecting both the equipment and the information they contain.

Privileged and Confidential Information

CarboQuímica's sensitive information must be protected at all times. As employees, it is our responsibility to prevent any disclosure or leakage to unauthorized persons, in strict compliance with the laws governing the markets.

Remember that only our official spokespersons are authorized to speak on behalf of CarboQuímica to the media. If you receive any such inquiry, please refer it to them.

Accounting and Financial Records

The integrity and transparency of our accounting and financial records are essential to maintaining trust in CarboQuímica. We must ensure that the information is complete and timely, in compliance with accounting standards and securities market laws. This ensures the accuracy of our indicators and the soundness of our operations.

Intellectual Property

Everything we create together at CarboQuímica, from source code and written materials to designs and databases related to our business, is a valuable asset and is legally protected. During your time with us, any idea or creation with intellectual property potential belongs to CarboQuímica. This ensures that our collective efforts are used for the benefit of the organization and not for personal or external interests.

Tu rol en la Seguridad de la Información

CarboQuímica's information security is a shared responsibility. It is crucial that you use and protect your accounts, access credentials, and passwords responsibly, recognizing the importance of safeguarding all the information we handle.

Personal Data Processing

We take the protection of all our internal and external stakeholders very seriously. Complying with data protection laws is not only an obligation but also a reflection of our respect for your privacy and the trust you place in us. We are committed to keeping your information secure and using it responsibly.

Key Principles for Personal Data Processing



Legality



Purpose



Proportionality



Accuracy



Limited
Retention



Confidentiality
and Security



Transparency
and Rights



Accountability



CARBOQUÍMICA THIRD PARTIES

Customers

General Principles



All employees must treat customers with courtesy, respect, and dignity. Interactions must be friendly and considerate.



Information about products and services must be presented clearly, accurately, and comprehensibly. Employees must be available to answer questions and provide guidance.



Employees must strive to provide high-quality products and services, ensuring that established standards are met.

Effective communication must be encouraged, with employees listening to customers' needs and concerns while demonstrating empathy and understanding.

Standards of Conduct

Employees must be honest in all interactions and **provide accurate information** about products, prices, and policies. Certain limitations apply, and some internal information will not be disclosed; however, **transparency must remain the guiding principle.**

It is essential to **protect customers' personal and business information.** Regardless of whether an NDA has been signed, relationships are built on trust, and **customer information is private.**

Employees must address customer **complaints and claims** with seriousness and commitment, seeking **prompt and satisfactory solutions.**

Employees must maintain **professional conduct** at all times, avoiding inappropriate or disrespectful behavior toward customers. Likewise, their actions must be **customer-focused**, understanding customers' needs and **seeking to exceed their expectations.**

Suppliers

CarboQuímica is committed to **building strong and lasting business relationships with suppliers and contractors who share our values of integrity, respect, and sustainability**. We require all our business partners to comply with applicable laws and regulations, ensure fair and safe working conditions, and contribute to environmental protection:

Employees who negotiate the acquisition of goods and services required by the organization must **require suppliers to provide fair and honest treatment in every transaction**, always seeking the best conditions for the organization.



The acquisition of goods and services shall be carried out through **objective, consistent, and transparent processes** that ensure the equitable participation of suppliers and their impartial selection, based on criteria of quality, competitiveness, and sustainability.



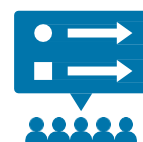
Employees are committed to the **proper handling of confidential information** belonging to suppliers and the organization.



Gifts, hospitality, or gratuities from suppliers that may create a conflict of interest or influence decision-making are not accepted.



All suppliers **must comply with the provisions set forth in the Supplier Code of Conduct Z-GEN-9**, which is published on the organization's website.



Competition

At CarboQuímica, we compete fairly and ethically, in compliance with the competition laws applicable to our industry and to each market in which we operate. We believe in a free market where innovation, quality, and the value we provide to our customers are the foundation of our success.

- ✓ **Fair Competition:** We do not engage in agreements or practices intended to restrict free competition, whether with customers, suppliers, or competitors.
- ✓ **Professionalism and Respect:** In all interactions with competitors' representatives, we maintain a professional and respectful attitude aligned with CarboQuímica's values and principles. We safeguard the reputation of both our company and the industry.
- ✓ **Información Sensible:** Sensitive Information: When interacting with competitors, whether individually or at business or professional forums and associations, we avoid discussing matters that could create legal risks or liabilities for CarboQuímica regarding compliance with competition laws. When in doubt, caution is our best guide.

Government and Authorities

CarboQuímica **cooperates at all times** with the Government and competent authorities in the full exercise of their powers, complying with the **laws, regulations, and applicable requirements** governing the organization's economic transactions, as well as with the **internal guidelines** established by management.



All requests and observations from **governments and authorities** will be addressed appropriately, seeking to **cooperate efficiently**.

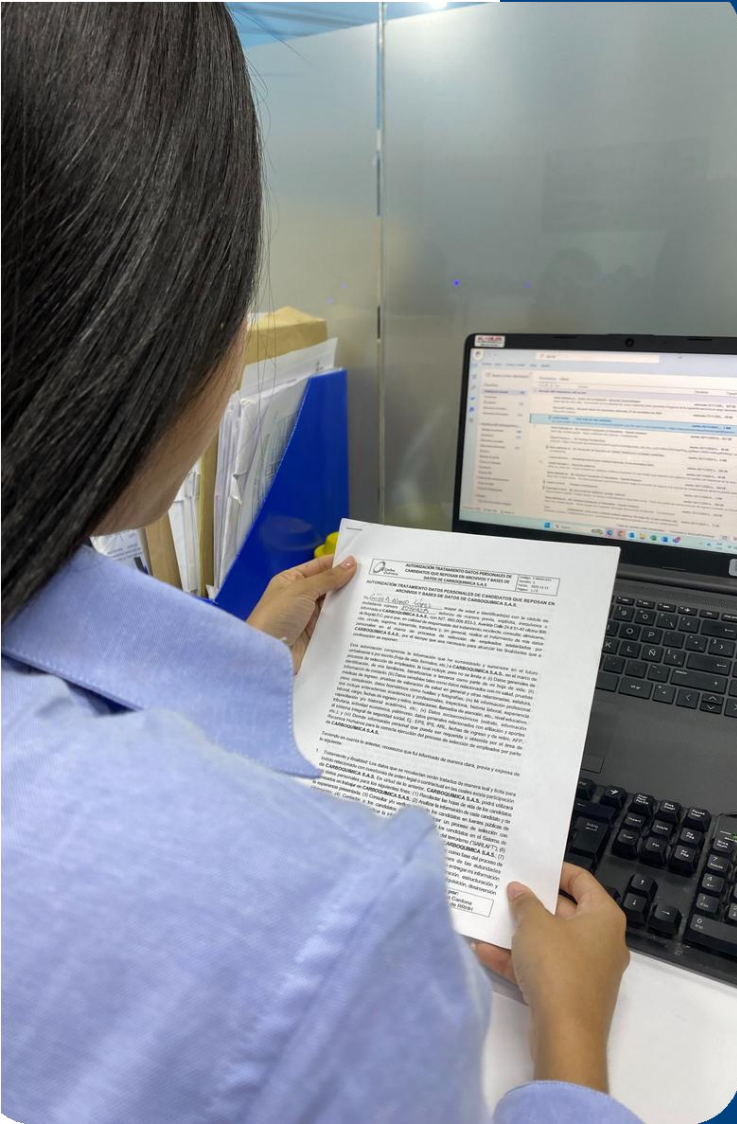


CarboQuímica will obtain **all permits and licenses** necessary to operate.



Our documentation of **all transactions and communications** with the government and authorities will be properly maintained.





CARBOQUÍMICA LEGAL COMPLIANCE

AAnti-Corruption and Anti-Bribery

Los **colaboradores** son responsables de mantener la más alta integridad en **todas sus acciones**. Deben evitar cualquier conducta que pueda dañar la **reputación de la compañía** o generar una pérdida de confianza por parte de nuestros clientes, proveedores y entidades gubernamentales. Es fundamental cumplir con **todas las políticas y procedimientos internos**, incluyendo el apartado de dádivas y hospitalidades indicado en este código.

AAnti-Money Laundering

CarboQuímica complies with laws for the **prevention of money laundering and terrorist financing** and promotes **awareness and compliance** among all employees.

Each employee **must attend the training sessions and activities** conducted by the Compliance Officers, as attendance is mandatory.

The processes and mechanisms developed to comply with **anti-money laundering laws**, which contribute to building security and trust in CarboQuímica's name, **must be understood** by all **employees** and implemented effectively.

Political Contributions

CarboQuímica may make contributions intended to finance **national political campaigns, parties, or movements**. To ensure transparency and compliance with applicable regulations, all donations to political parties **will require prior approval from the Board of Directors**. These contributions will be made exclusively in monetary form and to duly constituted political entities. The Compliance Officer will conduct a **due diligence process for each beneficiary**, and the Shareholders' Meeting will document all decisions. The amounts donated will be subject to the **limits established by law** and will be duly supported by official documentation.

Conflict of Interest

Employees must **avoid any situation that could create an actual or apparent conflict of interest** between their personal interests and those of the organization. Any action that could **compromise impartiality or objectivity in relationships** with the government and authorities is prohibited. Employees must immediately report any potential conflict of interest to their direct supervisor and Internal Control.

For clarification on any concerns, **refer to the Company's Conflict of Interest Policy**.

Gifts and Hospitality

At CarboQuímica, we seek to maintain transparency and avoid any situation that could improperly influence our decisions or create conflicts of interest. Therefore, we apply the following guidelines regarding gifts and hospitality.

What We Must NOT Do

- We must avoid any action that compromises our objectivity and integrity in business relationships.
- It is strictly prohibited to offer or accept any form of compensation, gift, or benefit to or from public officials, whether at the national or international level, including covering expenses related to meals, travel, or entertainment that could influence their decisions.
- We must also avoid any situation that could be perceived as bribery or improper favoritism and exercise particular caution when offering or receiving any gift or hospitality if there is an intention to influence or be influenced, or if its value is disproportionate.
- If there is any doubt regarding whether a gift or hospitality is permissible, it is essential to consult with your immediate supervisor or the appropriate departments.

What We SHOULD Do

We must act with prudence and transparency when receiving standard promotional materials bearing a company logo. If we receive any gift whose value or intent raises uncertainty, it is our responsibility to immediately report it to our supervisor for appropriate guidance. By following these guidelines, we protect the integrity of our decisions and CarboQuímica's reputation.

Zero Tolerance for Fraud

At CarboQuímica, honesty, integrity, and transparency are fundamental values that guide all our actions. Fraud, in any form, directly undermines these principles and will not be tolerated.

¿What Do We Consider Fraud?

We understand fraud to be any intentional act of deception, manipulation, concealment, or breach of trust carried out for the purpose of obtaining an improper benefit for oneself or third parties, causing financial or reputational harm to CarboQuímica, our customers, suppliers, employees, or any other stakeholder. This includes, but is not limited to:

- Misappropriation of company funds or assets.
- Falsification of documents, accounting records, or reports.
- False statements or omissions of relevant information.
- Misuse of privileged information.
- Undisclosed conflicts of interest that result in an unlawful benefit.
- Corruption, bribery, or extortion.
- Manipulation of processes or systems to obtain improper advantages.
- Misappropriation of intellectual property or intangible assets.

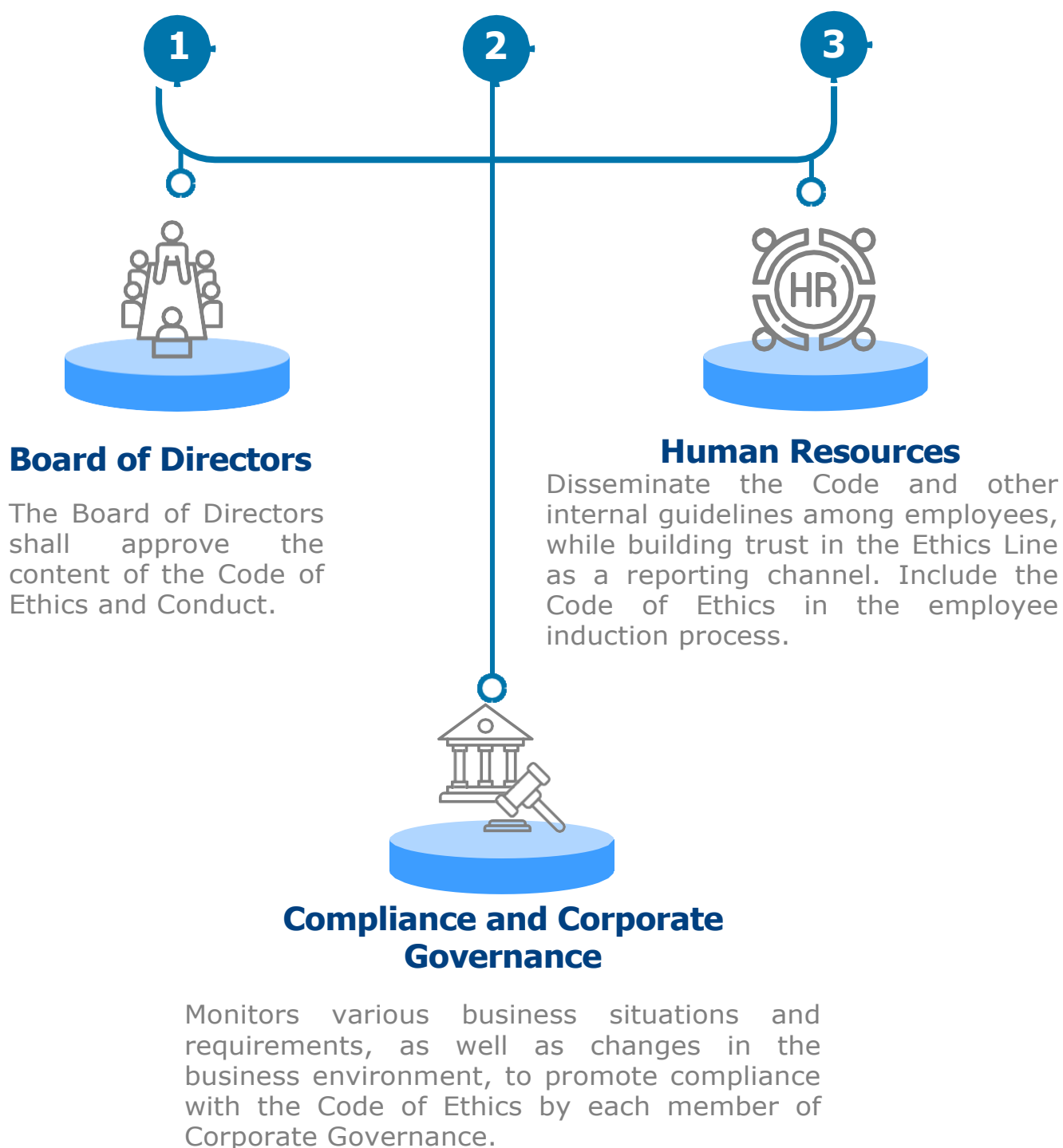
Employee Responsibilities

- Act with honesty and integrity in all work-related activities.
- Understand and comply with internal policies and procedures designed to prevent and detect fraud.
- Promptly report any suspicion or evidence of fraud to your direct supervisor, the Internal Audit department, or through the reporting channels established by the company. Good-faith reporting will be protected.
- Cooperate fully in any investigation related to potential fraudulent activities.
- Maintain the confidentiality of information related to fraud investigations.



RESPONSIBILITIES

Responsibilities



Responsibilities



Internal Audit

Evaluate compliance with the provisions contained in the Code.

Verify adherence to the guidelines established in the Code.

Follow up on the measures adopted by management regarding violations reported through the Ethics Line.

Managers and Directors

Ensure that all employees within their respective divisions comply with the provisions of the Code and the organization's other ethical guidelines.

Colaboradores

Read and understand the established guidelines.

Know and use the Ethics Line to report any violation of or risk related to the guidelines established in this Code.

Immediately report any actual, potential, or apparent conflict of interest that may affect the organization's interests.



ETHICAL COMPLIANCE SYSTEM

Ethical Compliance System

Violations of this Code will be subject to disciplinary action. The severity of such disciplinary action will depend on the seriousness of the violations committed.

In cases of serious misconduct or criminal offenses, disciplinary action may range from dismissal to filing a criminal complaint with the competent authorities.

We must periodically acknowledge that we have read the Code and agree to comply with it. Failure to read or acknowledge the Code is not an excuse for non-compliance.

Responsibilities



Integrity of Financial Information

All employees must **accurately and truthfully record** all information related to the company's business activities in the established systems. **Records must comply with all applicable laws and regulations**, faithfully reflecting each transaction and activity.



Internal Control

Todos **All employees are committed** to complying with the company's internal control system. This means **acting with diligence, transparency, and responsibility** in managing the company's resources, information, and operations. **Each individual is responsible** for understanding and complying with internal policies and procedures, as well as reporting any irregularities or deviations they may identify.



External Reports

All information provided to external entities must be **accurate, complete, and honest**. This includes reports required by internal policies, laws, regulatory authorities, courts, or related to matters such as exports, imports, and the environment. **Any employee who identifies false or misleading information must immediately report it to the Compliance Officer.**

Ethics Line

The Ethics Line is a formal mechanism that will be used to report any non-compliance with the Code of Ethics and other CarboQuímica internal guidelines.

This line is available 24 hours a day, every day of the year, and is managed by an independent third-party organization that ensures complete anonymity.

Report irregularities through our Ethics Line:



aarias@sanfordmgt.com
lfernandezc@sanfordmgt.com