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CODE OF ETHICS - CENTRO LOGÍSTICO INDUSTRIAL DEL PACÍFICO CLIP S.A.S. FREE TRADE ZONE USER-OPERATOR

Introduction and Scope

We are governed by the principles of ethics and transparency, and our focus is on Corporate Social Responsibility (CSR) and sustainability. Our conduct is guided by our core values and is framed within our mission and vision. Both the General Assembly and Management aim to promote integrity in the attitudes and behaviors of our partners and stakeholders.

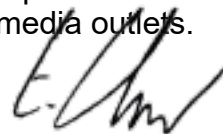
The Code of Ethics establishes a conceptual framework that guides our operations. It requires conscientious application by everyone, including our strategic partners, customers, suppliers, communities, among others, to achieve the best results in the activities of CLIP ZF

Our values allow CLIP ZF to continue to grow in a sustainable way, employees and stakeholders must commit themselves to appropriate them with discipline, ethics, integrity, honesty, respect, transparency and ensuring the best image. By making ethical and responsible decisions, the commitment to transparency will be achieved.


1. Values:

- **Cost Efficiency:** We constantly seek solutions for our clients where they have the best cost-benefit ratio for their operations, generating economic development and social welfare in the territory.
- **Environmental Sustainability:** We believe that through environmental education and understanding of the impacts we have on the environment we can achieve its protection and conservation for future generations.
- **Teamwork:** We encourage the integration and interaction of all members of the organization and promote the establishment of conversational networks that allow the generation of knowledge, commitment and impact on the final result, based on mutual respect and common purpose.
- **Results orientation:** We maintain continuous improvement in our management, aligned with the strategic direction of the organization, which allows us to achieve profitability margins, ensuring our growth, generating wealth and development for our target groups (shareholders, employees, customers, suppliers, community).

- 2. Intended Audience:** This code applies to all collaborators, stakeholders, and anyone else with any form of contractual relationship or link to our organization. We commit to applying and promoting it through various media outlets.



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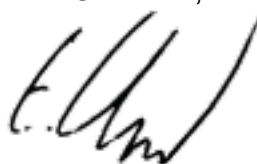
3. Role of the Management Group: As role models, they are tasked with leading by example through their actions, thoughtful decision-making, and relationships with stakeholders. Legitimate actions in pursuit of objectives prevail. Committed to results; they influence by setting a good example, guide and listen, promote efficient and timely processes, manage through self-control and promote respectful and clear communication.

4. Our Behavior:


- Human Dignity; We foster a culture where respect for human dignity is paramount, and this complies with our corporate values.
- Respect for the rules; We comply with the rules that regulate us out of conviction, we protect labor rights and human rights, according to ILO and Global Compact.
- Compliance with competition laws and regulations; We demand ethical and transparent conduct from customers and suppliers, using only legitimate means to obtain information from competitors.
- Promotes quality of life at work as the basis for growth and preservation of CLIP ZF; In a safe, dignified and hygienic work environment, we value differences of opinion and cultural diversity.
- Responsibility and confidentiality of information is a condition for us to preserve security, which implies that we do not disclose such information to third parties without proper and specific authorization, unless there is a legal or professional right or duty to disclose it.
- Proper use of assets and resources; We must not use CLIP ZF assets for personal gain and must ensure that company assets are not stolen, damaged or misused by others. We are responsible for keeping our work environment clean and orderly. In addition, we are responsible for maintaining operational security at all times. Limited personal use of tools such as computers, e-mail, telephones and the Internet may be acceptable within reason, as long as such use does not generate excessive costs and does not interfere with our job responsibilities.
- Employees; We do not expect anything in return for the exercise of our responsibilities. We must have a transparent and equitable management with customers, suppliers and other stakeholders.
- We maintain practices of transparency and integrity; we guarantee fair and loyal competition, respecting confidential information and intellectual property rights.

5. Important Aspects to Act: At the time of their activities, collaborators must take into account;

- That our actions will not affect CLIP ZF, its employees or third parties.



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- That we have the authorization to act or decide and accept our responsibility.
- That our conduct is in accordance with the law and CLIP ZF standards.
- That our conduct is in accordance with the guidelines of the Code of Ethics.
- That the result of our conduct is in the overall interests of CLIP ZF.
- That we are acting in a transparent manner.

6. Relationship with Stakeholders:


- Employees; We strengthen the work environment with respect, loyalty and teamwork, always striving to improve the standard of living.
- Suppliers; They supply us with raw materials, products or services for our operations. Their choice is made through competitive processes, and purchasing and contracting policies established by CLIP ZF, based on ethical, technical, opportunity, price, quality and needs criteria; they are our business partners, and are treated with transparency and integrity, we expect reciprocal behavior from them.
- Customers; In an integral and transparent relationship, we promote respect for their rights, we attend their needs in a timely manner; making clear the conditions between the parties and keeping confidentiality of the operations.
- Shareholders; As established in the current regulations and bylaws, we protect your investment, striving for sustainable profitability in the long term.
- Community and environment; We recognize the value, integrating ourselves in its development and sustainable growth.
- Government; Represented by the powers of the State, they give us the legal framework to develop our activities and guide the relevant public policy. We are obliged to contribute by complying with the Constitution, the Laws and the provisions of the authorities.

7. Policies:

- **Money Laundering - Financing of Terrorism / Financing the Proliferation of Weapons of Mass Destruction** (hereinafter LA/FT/FPADM); CLIP ZF does **NOT** accept any relationship with activities or persons involved with LA/FT/FPADM. We have a Self-Control System (SAGRILAFT), performing due diligence on the sources of resources of the counterparties and reporting suspicious transactions.
- **Donations and Contributions**; we transparently benefit non-profit organizations and communities in our area of



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influence among others, contributing to the improvement in the quality of life of its inhabitants.

- **Alcohol and Drug Use:** The use of alcohol, hallucinogenic drugs, or stimulants is strictly prohibited on company premises. The company has the authority to test for hallucinogens or psychoactive substances, when it deems it appropriate.
- **Preventive Measures in Incorrect Acts and Fraud;** Preventing being a victim of dishonest acts or acts that risk employees, products, services or image; incorrect acts or fraud by any employee will be reported to the authorities.
- **Measures Related to Harassment and Discrimination;** **We do NOT tolerate harassment,** forced labor, rights violations, discrimination, or child labor. Respecting others means that we are careful about how we treat others and how we communicate. Remember to consider how you might make other employees, partners and customers feel, and don't forget that we all come from different backgrounds so our perspectives may vary. To report to the Labor Coexistence Committee, Ethics and Compliance Committee and to the following channels: **Ethics Line: Tel. 2547201 Ext. 130 - 135 - Cell. 3185915080, Email: eticaycumplimiento@centrologisticoclip.com**
- **Conflict of Interest;** According to the Conflict of Interest Policy PO-GG-07, we must never put personal interest above our duty to the company. We must not enter into any agreement or do business that directly or indirectly competes with CLIP ZF. We must not use our position to obtain improper opportunities or benefits, including but not limited to gifts, loans, investment opportunities, outside employment, contract opportunities or personal transactions. Employees who consider that they may have a conflict of interest must notify their immediate supervisor and the Compliance Officer on form FR-GG-23 Conflict of Interest Report. Failure to do so will result in a reprimand or appropriate sanctions.
- **Secure and Confidential Information;** We are responsible for the integrity and veracity of the information in charge, records, classification and conservation, according to internal standards and the law; to decide must have complete, clear and accurate information, taken from the systems, seeking that documents and content are suitable and legitimate. Confidential information shall be kept as non-public to third parties, except as required by law.
- **Gifts and Hospitality;** According to Gift and Hospitality Policy PO-GG-04, we are not permitted to solicit, accept or request any gift that may influence (or appear to influence) our ability to make objective decisions in CLIP ZF's best interests. We must never seek or



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Negotiations should never be structured around gifts, services, or courtesies from customers, suppliers, consultants, service providers, or any other third party. It is the responsibility and obligation of all employees to report, by filling out the FR-GG-28 Gifts and Hospitality Report form, gifts and hospitality received from third parties with whom they have a relationship and that may in any way have the purpose of seeking to influence the actions and decision making in relation to business or undue benefits.

- **Integral Management:** We have implemented an integral management system to comply with quality, environmental, logistic chain and sustainability standards, we must all be aligned to the compliance of these Management Systems.

8. Risk Management: We have implemented a risk management system that seeks to prevent the materialization of threats to strategic objectives and operations. Employees must internalize risk-based thinking in order to maintain organizational ethics and transparency.

9. Means of Communication: We will communicate with stakeholders in a timely and transparent manner, aligned with the Mission, Vision and Corporate Values. Suitable and confidential means are available to report complaints or clarify concerns, facilitating transparency and ethical behavior. When reporting, you should consider these statements:


- Total confidentiality is guaranteed in the case of complaints.
- When reporting, you must have verifiable information, facts and data.
- It is against the Code of Ethics: false denunciations, adulterated reports or hiding information.
- In the event of any type of discrimination or mistreatment of the reporting employee, whoever does so will face the corresponding disciplinary measures.
- If you have any doubts, you should contact your superior. If you consider doing so anonymously, please contact the following channels: Ethics Line: Tel. 2547201 Ext. 130 - 135 Cell. 3185915080, Email: eticaycumplimiento@centrologisticoclip.com, or the suggestion boxes provided for this purpose.
- If the complaint corresponds to labor relations situations, you should go to the labor coexistence committee, or to the suggestion boxes.

10. How to proceed with respect to the Code of Ethics: The code will be disclosed to employees through established communication channels and presentations delegated to the Compliance Officer.

- Employees are required to report suspicious or irregular conditions, all reports will be treated confidentially.



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- If a suspicious or irregular activity becomes known, the employee is obliged to report it, failing which he/she will be held responsible for the consequences.
- Those who, being involved in any irregularity, report it through the authorized channels; their collaboration will be taken into account when taking disciplinary actions.
- The information will be confidential, involving fair and timely investigations.
- It is a breach of the code of ethics to destroy, alter and conceal evidence.
- Employees must facilitate investigations of irregularities or violations of the rules, if the inquiries define corrective measures; the steps to be taken will be indicated, to avoid a recurrence. Those involved have the right to be heard.

11. Consequences for non-compliance with the Code of Ethics: Failure to comply with the Code of Ethics, either intentionally or by omission, is a serious offense and will result in appropriate sanctions, such as dismissal for just cause under the substantive labor code, Colombian labor laws or internal labor regulations, in addition to possible effects with civil or criminal liability.

When an employee misses a business opportunity or misses a job performance or, in good faith, reports a suspicious situation, the employee will not suffer any type of retaliation for such actions, subject to the code.

Executives, Managers, Chiefs, Coordinators, or Employees who overlook or forgive infractions without maintaining integrity and transparency according to the code, will face disciplinary measures, rules, and laws, potentially resulting in dismissal and/or criminal prosecution. Resulting damages may require reimbursement to CLIP ZF or affected third parties.

12. Change log and document validation

Broadcast		Registration	Description
Date	Source	Date	
February 02, 2023	Extraordinary Shareholders' Meeting	Act 27 February 02, 2023	In version 2, we made structural changes to align the document with CLIP ZF's policies and mission values.


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