BUSINESS TRANSPARENCY AND ETHICS PROGRAM (PTEE)

September 9, 2026

APPROVED BY THE GENERAL SHAREHOLDERS' MEETING

VERSION 3.

PRESENTATION

The ZAHR SAS business group, comprised of the companies Inversiones Botero Vélez SAS, Muebles Albura S.A.S., Lacassine S.A.S., and Inmobiliaria Vélez S.A.S., has 27 years of experience. Its activities include the manufacture and sale of furniture, real estate transactions, and accommodation. This business group is characterized by a culture of integrity and ethics in its internal and external operations. Accordingly, its activities are carried out under strict quality standards in service, which are in turn supported by values such as honesty, responsibility, operational integrity, open and transparent relationships, and corporate commitment.

As a manifestation of these values, the business group categorically rejects transnational corruption and bribery (hereinafter C/ST) or related practices, both within the company and in its external relations. To encourage the prevention of such practices and promote their rejection, the company has adopted this Business Transparency and Ethics Program .(hereinafter PTEE)

The Business Group's Strategic Plan for Occupational Health and Safety (PTEE) is a dynamic document, aligned with current national regulations regarding transparency and business ethics. The document is based on an ongoing analysis of the occupational health and safety (OHS) risks to which the company is exposed, taking into account operational fluctuations and the company's characteristics. This plan also considers the guidelines issued by administrative authorities, such as the Superintendency of Companies, as well as international agreements signed by Colombia related to OHS risks, particularly the provisions of Law 1778 of 2016, External Circular 100-000011 of August 9, 2021, and Law .2195 of 2021

Content

1. DEFINITIONS

To facilitate a proper understanding of the provisions of this PTEE, the following definitions are provided, which must be followed when interpreting and applying the program. Several of the definitions included here were taken from External Circular 100-000011 of August 9, 2021, issued by the Superintendency of Companies; others are our own elaborations based on current regulations on the matter.

- Total Assets: These are all current and non-current assets recognized in the statement of financial position that correspond to the present economic resources controlled by the company.
- Senior Management: These are natural or legal persons, appointed in accordance with the company's bylaws or any other internal provisions and Colombian law, as applicable, to manage and direct the company, whether they are members of governing bodies or individuals. This category includes members of the Shareholders' Meeting and the Legal Representative.
- Shareholders: are those natural or legal persons who have made a contribution in money, in work or in other assets appreciable in money to a company in exchange for shares.
- Compliance Audit: is the systematic, critical and periodic review regarding the proper execution of the PTEE.
- Reporting Channels of the Superintendency of Companies: These are the online reporting systems for complaints about transnational bribery and corruption, provided by the Superintendency of Companies on its website.
- Contractor: In the context of an international business transaction, this refers to any third party that provides services to the company or has a contractual legal relationship of any kind with it. Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants, and individuals who are party to collaboration or joint venture agreements with the legal entity.
- State Contract: State contracts are all legal acts that generate obligations that are carried out by the entities of Law 80 of 1993, provided for in private law or in special provisions, or derived from the exercise of the autonomy of the will, as well as those found in article 32 of the General Contracting Statute.
- Corruption: will be all conduct aimed at a company benefiting, or seeking a benefit or interest, or being used as a means in, the commission of crimes against the public administration or assets or in the commission of transnational bribery conduct.
- Due Diligence: This refers to the periodic review that must be conducted on the legal, accounting, and financial aspects related to an international business or transaction. Its purpose is to identify and assess the risks of transnational bribery that may affect the company and its contractors. With respect to the latter, this includes verifying their creditworthiness and reputation.

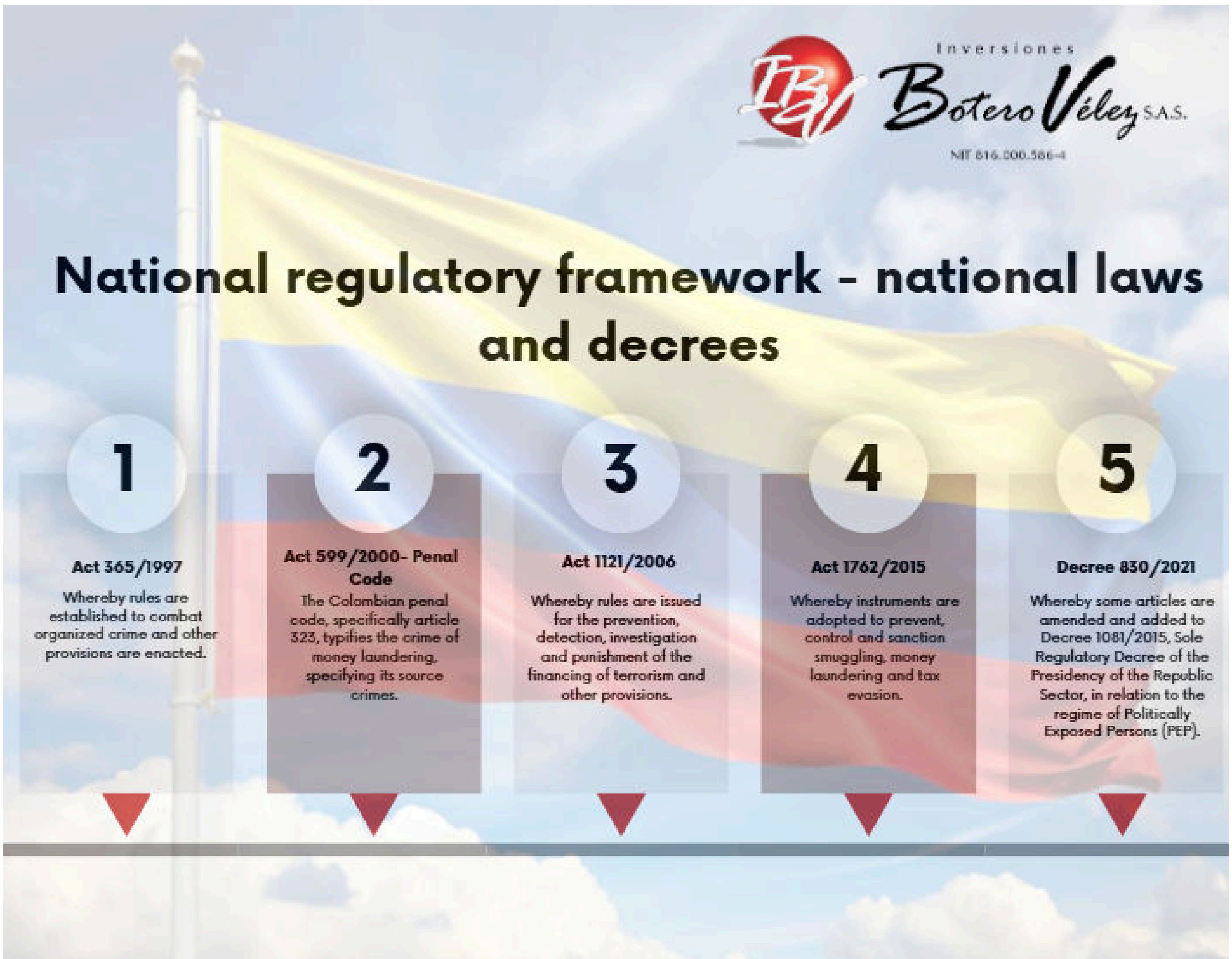
Under no circumstances shall the term Due Diligence as defined in this manual refer to Due Diligence procedures used in other risk management systems (e.g., money laundering and terrorist financing), which are governed by different rules.

- Collaborator: is the individual who undertakes to provide a personal service under subordination to a legal entity or any of its subordinate companies, in exchange for remuneration.
- State Entity: These are created by the constitution, law, ordinance or agreement, or authorized by them, which have public participation, where an administrative, commercial or industrial function is fulfilled.
- Ethics Hotline: Internal reporting channel of the S.A.S. business group for transnational or related acts of bribery, or any breach of this manual and its policies.
- Restricted Lists: refers to lists published or issued by national and/or international persons, which include a list of persons who, according to the one who publishes them, may be linked to bribery and corruption activities.
- Risk Matrix: This is the tool that allows the company to identify the risks of corruption or transnational bribery.
- OECD: Organisation for Economic Co-operation and Development.
- Compliance Officer: This is the individual responsible for identifying, measuring, evaluating, managing, and mitigating the risks of transnational corruption and bribery that could compromise the company. They are also responsible for developing and implementing measures to prevent and combat these risks, as well as managing the company's anti-corruption and anti-bribery program.
- Politically Exposed Person: Politically exposed persons (PEPs) is a term that describes someone who has been entrusted with a prominent public responsibility.
- PEPs of International Organizations: are those natural persons who exercise management functions in an international organization, such as the United Nations, the Organization for Economic Cooperation and Development, the United Nations Children's Fund (UNICEF) and the Organization of American States, among others (e.g., directors, deputy directors, members of the Board of Directors or any person who exercises an equivalent function).
- Foreign PEPs: These are natural persons who hold prominent and distinguished public functions in another country. In particular, the following persons: (i) heads of state, heads of government, ministers, undersecretaries, or secretaries of state; (ii) members of Congress or Parliament; (iii) members of supreme courts, constitutional courts, or other high judicial bodies whose decisions are not normally subject to appeal, except in exceptional circumstances; (iv) members of courts or boards of directors of central banks; (v) ambassadors; (vi) chargés d'affaires; (vii) high-ranking officials of the armed forces; (viii) members of the administrative, management, or supervisory bodies of state-owned enterprises; (ix) members of reigning royal families; (x) prominent leaders of political parties or movements; and (xi) legal representatives, directors, deputy directors, senior management members and members of the Board of an international organization (e.g. heads of state, politicians, high-ranking government, judicial or military officials and senior executives of state-owned enterprises).

- Close associate: has the meaning established in Decree 1081 of 2015 and other regulations that modify, complement, replace, or add to it. This definition shall be understood to apply not only to close associates of PEPs, but also to those of foreign PEPs and PEPs of international organizations.
- Business Transparency and Ethics Program (PTEE): This document outlines the company's policy regarding the risks of transnational corruption and bribery, with the aim of identifying, detecting, preventing, managing, and mitigating them. This is done in accordance with the risk matrix and other instructions and recommendations established in Chapter XIII of the Superintendency of Companies' Basic Legal Circular.
- Risk factors: These are the potential elements or causes that generate occupational health and safety (OHS) risks for the company. These factors include: the economic sector, country, third-party risk, among others.
- Corruption Risks (C): is the possibility that, by action or omission, the purposes of public administration may be diverted or public assets may be affected towards a private benefit.
- Transnational Bribery Risks (TS): is the possibility that a legal entity, directly or indirectly, gives, offers or promises to a foreign public servant sums of money, objects of pecuniary value or any benefit or utility in exchange for said public servant performing, omitting or delaying any act related to his functions and in relation to an international business or transaction.
- Warning Signs: These are the facts, situations, events, amounts, quantitative and qualitative indicators, financial ratios and other information that the company determines as relevant, from which the possible existence of an unusual or suspicious fact or situation can be inferred in a timely and/or prospective manner.
- Supervised Company: the companies that the President of the Republic or the Superintendent of Companies designates as supervised, following the parameters of article 84 of law 222 of 1995.
- Transnational Bribery: is the act by virtue of which a legal person, through its collaborators, administrators, associates, contractors or subordinate companies, gives, offers or promises to a foreign public servant, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value or (iii) any benefit or utility in exchange for said public servant performing, omitting or delaying any act related to his functions and in relation to an international business or transaction.
- Inherent risk: is the intrinsic risk of each activity, without taking into account the controls that are made internally.
- Residual risk: risk that remains after considering the impact of mitigation controls on risk reduction.
- Conflict of interest: These are situations in which a person's judgment, in relation to a primary interest for him or her, and the integrity of his or her actions, tend to be unduly influenced by a secondary interest, which is frequently of an economic or personal nature.

2. REGULATIONS

The PTEE of the business group complies with current Colombian regulations on occupational health and safety, as well as the pronouncements of the Superintendency of Companies and other administrative authorities. In particular, but not limited to, it follows the provisions of:



3. SCOPE

This program is mandatory for all individuals and legal entities associated with the business group. This means it applies to shareholders, senior management, employees, contractors, clients, and all other individuals who have a commercial or legal-contractual relationship with the company.

4. OBJECTIVES

4.1 GENERAL OBJECTIVE:

Adopt the PTEE of the business group as the mechanism to identify, prevent, mitigate and manage the risks of corruption, bribery and transnational bribery within the company and in its relationship with third parties.

4.2 SPECIFIC OBJECTIVES:

- Develop the program's risk management tools (risk matrix) that allow the identification, analysis, and evaluation of the risks of corruption, bribery, and transnational bribery to which the company is exposed.

- Implement the necessary control measures to reduce the inherent risks detected in the different areas and processes of the organization.

- Develop and implement the policies and procedures required to integrate the program into the different areas and activities of the company.

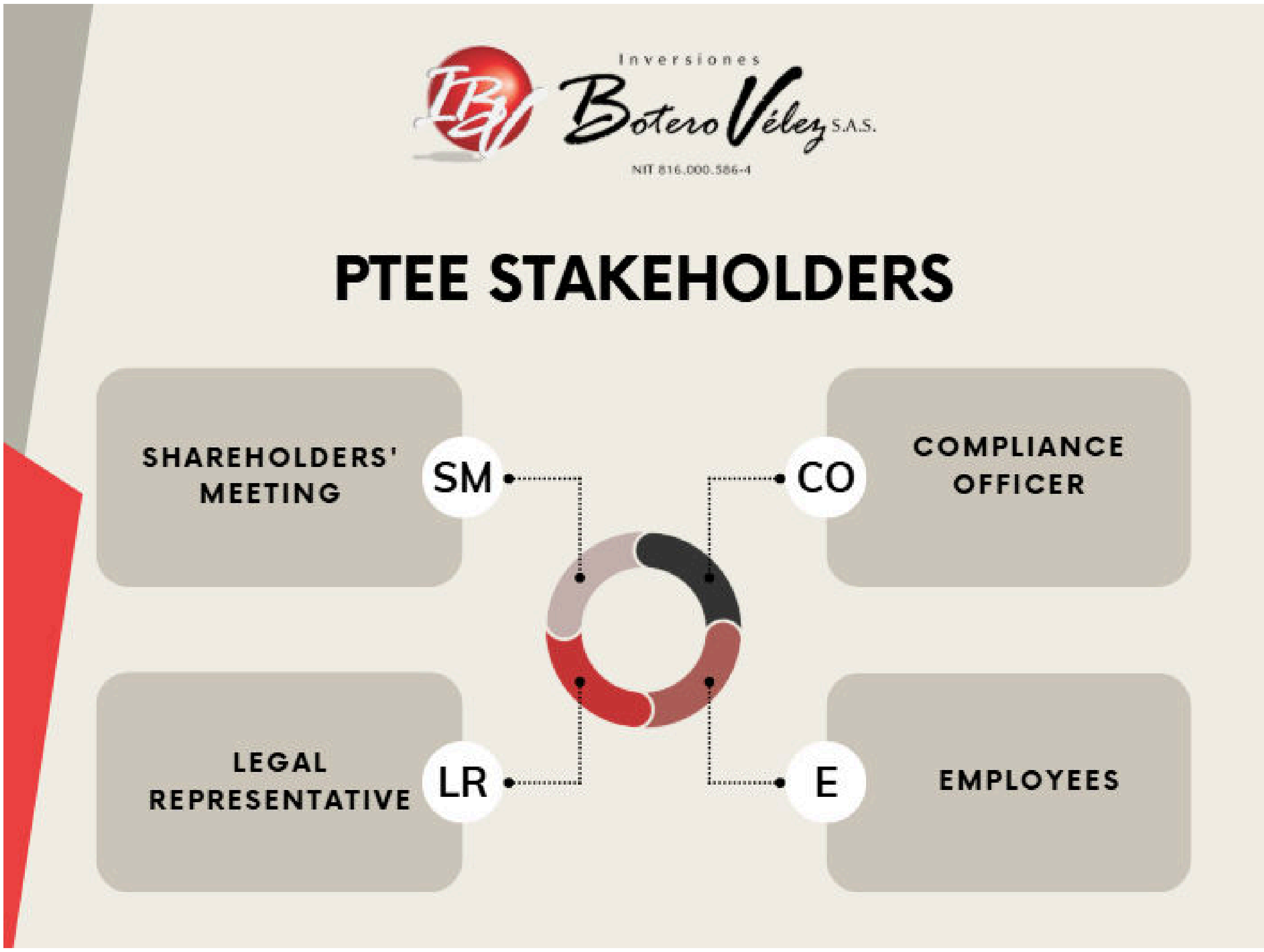
- Disseminate and communicate the PTEE to shareholders, senior management, employees, suppliers, contractors, and customers. This will ensure their awareness and guarantee its implementation.

- To generate a culture of compliance within the company and in the relationships of the business group, with natural or legal persons with whom it has a commercial or legal-contractual relationship.

5. FUNCTIONS AND RESPONSIBILITIES

The PTEE is formed by the joint and coordinated action of the subjects that are linked to the business group, who are responsible for ensuring its application and compliance.

The coordination of this action requires the establishment of responsibilities and functions for the people who are directly part of the company, in relation to the fight against C/ST conduct and the effectiveness of the program:



5.1 Shareholders' Meeting:

The functions and responsibilities of the Shareholders' Meeting, as the highest governing body of the business group, are:

1. Define the profile of the Compliance Officer in accordance with the law, taking into account the requirements, incompatibilities, and disqualifications for this role within the company.

2. Appoint a Compliance Officer, following the formalities required by law. This officer will be responsible for monitoring and ensuring compliance with the PTEE and other tasks necessary for the program's proper functioning.

3. Approve the document that includes the PTEE and its updates.

4. Issue and/or approve anti-corruption and anti-bribery policies, integrating them into the PTEE, in order to prevent or mitigate acts of transnational corruption and/or bribery.

5. Issue and/or approve updates to anti-corruption policies, so that they are integrated into new versions of the PTEE, in order to prevent or mitigate acts of corruption and/or transnational bribery, taking into account the effectiveness they have reflected in the company.

To make a commitment aimed at preventing the risks of transnational corruption and bribery, so that the development of the company's business is ethical, transparent and honest.

7. Ensure the economic, human, technical and technological resources for the development, implementation and operation of the PTEE.

8. Take actions aimed at pursuing and condemning the actions of associates, who have administrative and management functions, collaborators and administrators of the business group who have generated or materialized a risk of transnational corruption or bribery, or have infringed the provisions of the PTEE.

9. To propose and direct communication mechanisms for the PTEE and its updates, for all counterparts (internal or external), national or international.

You must receive reports from the Compliance Officer on the development, progress, and other activities of the PTEE at least once a year. If these reports are not submitted, you must request them; you must also comment on these reports and provide written documentation of your observations.

5.2 Compliance Officer:

The company's Workplace Safety and Health Program (WSHCP) needs to be adapted to the dynamics of the company's operations, its structure, and the environment that affects the occupational health and safety (OHS) risks to which it is exposed. Therefore, the WSHCP requires constant monitoring, updating, and improvement. Its effectiveness in combating OHS practices depends on the measures adopted addressing the risks in their current state and scope. The Compliance Officer is responsible for monitoring, updating, and improving the WSHCP.

The person appointed must possess the qualities that make them suitable for the aforementioned purpose. These qualities will be determined by the company's Shareholders' Meeting.

These must include:

Enjoy the ability to make decisions to manage the risk of C/ST and have direct communication with the highest social body.

Possess sufficient knowledge in the area of C/ST risk management and understand the ordinary course of the company's activities.
To be domiciled in Colombia.

The Compliance Officer:

1. He may be employed by the company or be employed under a service contract.

2. He/She may not belong to the administration, the social bodies or belong to the fiscal audit body or who performs similar functions or acts in its place in the company.

3. In the case of outsourced services: A Compliance Officer may not serve as the primary or alternate Compliance Officer in more than ten (10) companies. To serve as the Compliance Officer for more than one company, (i) the Compliance Officer must certify; and (ii) the body appointing the Compliance Officer must verify that the Compliance Officer does not act as such in companies that compete with each other.

4. When there is a business group or a declared control situation, the Compliance Officer of the parent or controlling entity may be the same person for all the companies that make up the group or conglomerate, regardless of the number of companies that make it up.

This will depend solely on the Highest Social Body and will work autonomously to avoid questions about the management of the PTEE program; for which it must have the resources it deems appropriate at the human, technological and/or economic level.

The appointment will be reported to the Office of Economic and Corporate Affairs of the Superintendency of Companies within fifteen (15) business days following the designation. This notification must be made in writing. Any changes to the Compliance Officer's information must also be reported in writing.

The Compliance Officer will perform the following functions:

1. The Compliance Officer should be considered the highest authority on matters related to PTEE (Production, Equipment, and Equipment). Therefore, all actions aimed at preventing, managing, or penalizing violations in these areas must be handled by the Compliance Officer.

2. The PTEE policies and their updates will be drafted and presented to the Shareholders' Meeting. Furthermore, they will be shared with all areas covered by these policies to ensure their application is appropriate.

3. The Compliance Officer will submit reports to the Shareholders' Meeting at least once a year. These reports must include an evaluation and analysis of the efficiency and effectiveness of the PTEE (Productivity and Energy Efficiency Program) and its policies, and, where applicable, propose improvements. They must also demonstrate the results of the Compliance Officer's and the entity's management's performance in complying with the PTEE.

4. It will lead the structuring, implementation, monitoring of compliance with the PTEE and the sanctions for non-compliance for all counterparties with whom the business group has legal-contractual relationships.

5. It will continuously assess the risks of transnational corruption and bribery to which the company is exposed. To this end, it may use the human, technical, and financial resources it deems necessary. This assessment will be carried out through the implementation and updating of a risk matrix.

6. It will define, adopt and monitor actions and tools for the detection of transnational corruption and bribery risks, in accordance with the implemented risk matrix.

7. The company will participate in disciplinary proceedings against employees for non-compliance with the PTEE (Workplace Safety and Energy Policy) and will report these proceedings to the Shareholders' Meeting. Similarly, the company will participate in sanctioning proceedings against any other counterparty within the business group. In both cases, the company may issue a statement, and its opinion will be considered when determining the sanction.

8. It will establish internal investigation procedures to detect non-compliance with the PTEE and acts of transnational corruption or bribery.

9. You must provide training to new members of the company upon their entry and to workers or contractors in general at least once (1) a year on the PTEE, conduct for the prevention of acts of corruption and transnational bribery or omissions that facilitate this type of acts.

10. You may request and manage internal audits or investigations using the company's own human, technical or economic resources, or those of specialized third parties when there are suspicions of violations of Law 1778 of 2016 or related regulations, or the PTEE.

11. It will ensure the implementation of appropriate channels to allow any person to report, confidentially and securely, non-compliance with the PTEE and possible suspicious activities related to transnational corruption and bribery.

12. Verify the proper application of the whistleblower protection policy of this program.

13. It will verify compliance with due diligence procedures.

14. It will ensure the proper filing of documentary evidence and other information relating to the management and prevention of transnational corruption and bribery risks.

15. Other functions that are added in the dynamics of inspection, surveillance and control of the PTEE and those added or modified by national authorities or the law.

5.3 Legal Representative:

As the person who embodies the company's operations, the Legal Representative must conduct themselves with the highest standards of behavior. They are responsible for implementing, complying with, and promoting compliance with the PTEE (Productivity and Energy Efficiency Plan) within the company and in its dealings with third parties. In this regard, the Legal Representative has the following responsibilities:

1. Collaborate with the Compliance Officer in structuring the PTEE, its policies, and other mechanisms for identifying, managing, and mitigating C/ST risks. Additionally, provide support in its implementation, proper application, supervision, and monitoring.

2. Propose ways to protect whistleblowers when a collaborator or third party states that they are being retaliated against for the complaints made.

3. Identify alternatives for improving the PTEE and other measures to combat C/ST conduct.

4. Receive reports from the Compliance Officer on investigations into alleged C/ST conduct, and provide an opinion on them, when deemed appropriate.

5. Certify to the Superintendency of Companies compliance with the provisions regarding PTEE, when required.

6. Ensure that the activities in development of the PTEE are properly documented, preserving the documentary supports in the manner provided for in the current regulations and in the "Policy for the preservation of documentation" in this program.

5.4 Statutory Auditor:

The company's statutory auditor plays a fundamental role in alerting the public to any conduct by C/ST that could compromise the company. Therefore, the following functions are assigned to them:

1. To receive reports of acts of corruption or transnational bribery.

2. Pay special attention to alerts that may give rise to suspicion of an act related to a possible act of transnational corruption or bribery.

3. Verify the reliability of the accounting and ensure the absence of direct or indirect payments related to bribery or corrupt conduct in the transfers of the business group.

4. Cooperate with the Compliance Officer when inconsistencies or failures are detected in operations, in relation to transnational bribery and corruption behaviors or events within the company, and in improving operations to combat these behaviors.

5. To report to the competent authorities any act of transnational corruption or bribery that comes to their attention in the course of their duties. This is in accordance with Article 32 of Law 1778 of 2016.

5.5 Contributors:

The effectiveness of the PTEE is only possible with the proper participation of the company's employees. In this regard, the following are their responsibilities and functions:

1. Respect and comply with the guidelines of this program and other policies adopted by the company, in relation to transnational corruption and bribery.

2. Promote an anti-bribery and anti-corruption culture through ethical conduct.

3. Report any acts of transnational bribery or corruption related to the corporeta group that you are aware of, through the channel provided for this purpose within the framework of this program.

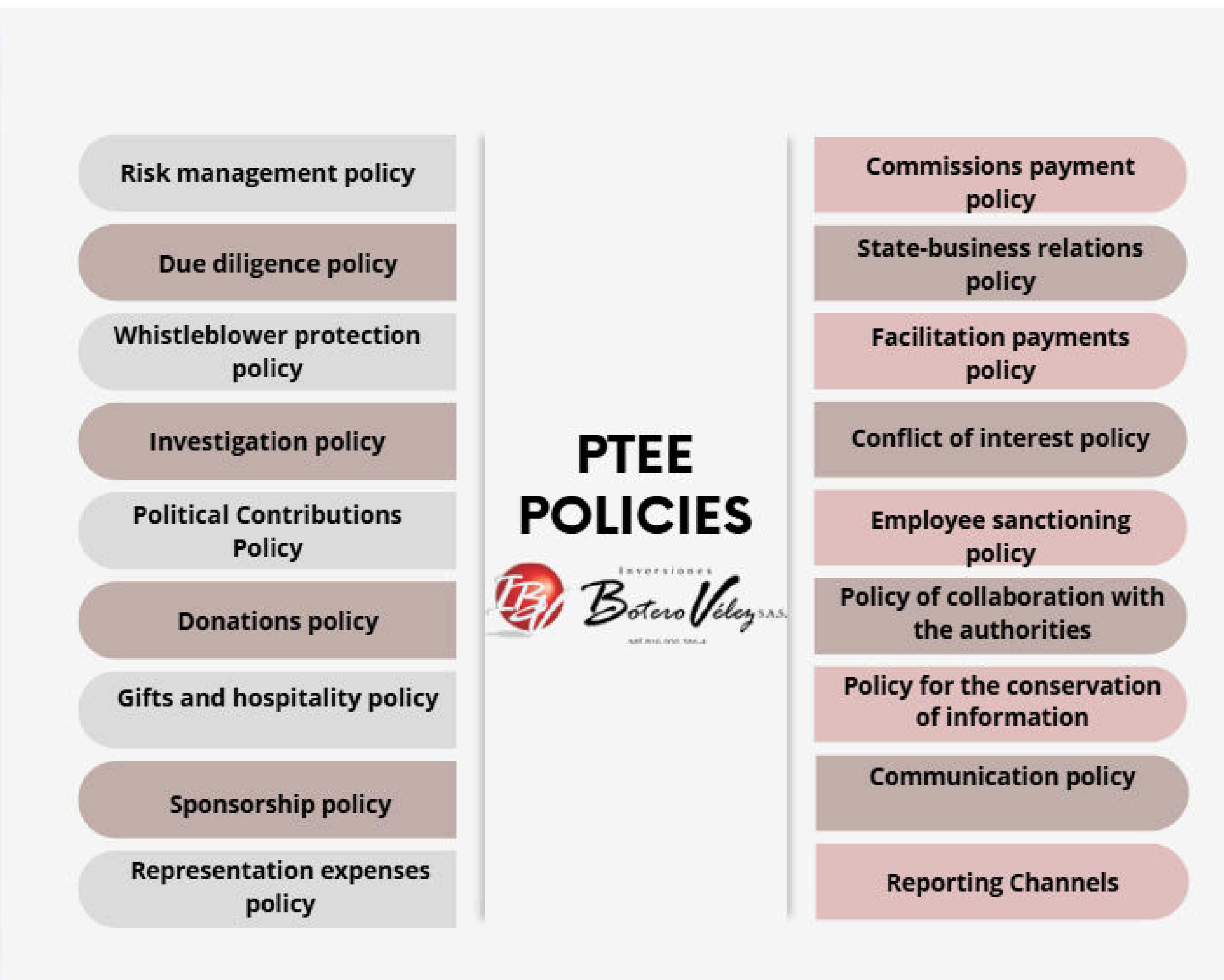
4. Attend the training sessions to which they are summoned, receive and pay attention to the information provided in relation to the programs, policies or measures adopted by the company against transnational corruption and bribery.

5. Demonstrate understanding and management of the programs, policies or measures adopted by the company against transnational corruption and bribery in the periodic evaluations described in this manual or implemented by the company.

6. Attend to the requirements and requests made by the Compliance Officer regarding the PTEE.

6. POLICIES

The PTEE policies provide the guidelines to be followed when carrying out different operations within the business group that may involve occupational health and safety (OHS) risks. These policies allow for the coordination of actions related to these activities and the effective fight against OHS conduct within the company; therefore, compliance is mandatory for all those associated with the company.



6.1 POLICY ON MANAGING THE RISK OF CORRUPTION, BRIBERY AND TRANSNATIONAL BRIBERY:

For the development and implementation of the program's risk management policy, the business group starts with an analysis of its internal and external context, as well as the risk factors grouped into the following categories: country, economic sector, third parties, among others

Once the above has been done and adopting the risk assessment methodology of the ISO 31000:2018 standard, the following stages are carried out for risk management (general risk cycle): (i) Identification (ii) Measurement (iii) Treatment (iv) Monitoring.

The aforementioned stages are carried out using the C/ST risk matrix (Appendix 1), enabling the identification of risks to which the company is exposed and the analysis of their potential causes and consequences. Furthermore, for each identified event, its probability and impact are determined (using a quantitative scale), allowing for the calculation of the inherent risk level according to the risk factor, operation, and area where it occurs.

Once the risks to which the company is exposed (inherent risk) have been identified, controls are designed and implemented for each of these, also measuring their effectiveness to finally obtain the residual risk level for each of the identified events.

The C/ST risk landscape (both inherent and residual risk) is presented graphically through the heat map found alongside the program's risk matrix (Annex 1).

6.2 DUE DILIGENCE POLICY:

In the Business Transparency and Ethics Program, due diligence refers to the "(...) process of constant and periodic review and evaluation (...)" that the company carries out in accordance with the Corruption Risks or Transnational Bribery Risks to which it is exposed. With this in mind, due diligence involves identifying the third party and assessing the C/ST risk that this third party may pose to the company.

The above is done by verifying, through technological tools, the good credit or reputation of the third party, as well as information about the commercial, reputational and sanctioning background in administrative, criminal or disciplinary matters that have affected, affect or may affect the persons subject to due diligence.

For specific cases involving contractors or representatives in public tenders or state contracts within or outside the country, the conditions of the relationship with the third party are verified through an evaluation of the legal, accounting, and financial aspects related to the transaction, in order to identify the existence of possible risks of transnational bribery and corruption.

In accordance with this policy, the PTEE due diligence procedure for shareholders, customers, suppliers and collaborators has been established, as shown in Annex 3 - Interactive Map of PTEE Procedures.

For the purposes of this policy, third parties shall be understood to mean any natural or legal person with commercial or legal-contractual relations with the business group or in negotiations to establish such relations.

The information obtained for the performance of the PTEE due diligence procedure will be updated at least every two (2) years, in accordance with the procedure established for updating third parties

Due diligence will be documented in writing. The documentation will be handled in accordance with the "Document Retention Policy" established in this Manual.

6.3 WHISTLEBLOWER PROTECTION POLICY:

The effectiveness of the PTEE (Strategic Prevention and Evaluation Plan) and the fight against C/ST (Consumer/Workplace Harassment) conduct depends on the proper and timely reporting of such conduct. Therefore, protecting those who perform this role is crucial. In this regard, the business group, through its senior management, guarantees the following protections to whistleblowers:

- Whistleblowers of potential transnational corruption or bribery will not be subject to retaliation, punishment, sanctions, revenge, aggression, or offense by the corporate group, its shareholders, employees, or third parties. Should such retaliation occur, the corporate group undertakes to take the necessary measures to correct, mitigate, and/or sanction the conduct. To this end, if a whistleblower believes they are being retaliated against, they must report this to the Compliance Officer, who will in turn inform the Shareholders' Meeting (the highest governing body), in accordance with the "Whistleblower Protection Procedure" outlined in Annex 3 of this Interactive Procedures Manual.

- Keep the whistleblower anonymous, to avoid retaliation from the accused or third parties.

- Protect the whistleblower.

- If necessary, promote the protection of the whistleblower through state entities.

- The Shareholders' Meeting or the Legal Representative may provide other means of protection for whistleblowers, at the request of the Compliance Officer, depending on the particularities of the specific case.

- The implemented safeguards will cease immediately if the complaint is dismissed for not constituting an action or omission related to any type of C/ST conduct. If the complaint constitutes any type of transnational bribery or corruption by action or omission, the protocol will remain in effect for the entire duration of the process, that is, while all corrective and disciplinary measures are taken. All complaints will be considered presumptive and made in good faith until proven otherwise. In accordance with the "Investigation Policy" in this manual, the Compliance Officer will assess, in the investigation report, the recklessness or bad faith of the actions. Once the report is submitted, the appropriate measures will be taken.

6.4 RESEARCH POLICY:

When suspected C/ST conduct is reported, by any means, the Compliance Officer, in conjunction with the necessary departments and personnel, will conduct the corresponding internal investigation. This investigation will be carried out in accordance with the "Internal Investigation Procedure (PTEE)" described in Annex 3 of this Manual – Interactive Procedures Map.

In investigations carried out within the company regarding alleged bribery or corruption conduct, or related matters, the following principles will be respected: confidentiality, efficiency, impartiality, legality, proportionality, due process, and good faith.

6.5 POLITICAL CONTRIBUTIONS POLICY:

Although making political contributions has not been common practice within the company's activities, the possibility of doing so has been established, provided that the following guidelines are met:

- Political contributions will require express written authorization from the General Shareholders' Meeting, which will define the recipient of the contribution and its value.

- Prior to making political contributions, the following must be done:

- ✓ Conduct due diligence on the beneficiary of the contribution, and analyze the existence of conflicts of interest with the beneficiary of the contribution.

- ✓ It must be verified that the company does not obtain any advantages from receiving this contribution. It must also be verified that no benefits are received other than those established in current national regulations.

- Once the contribution has been made, a formal accounting record of political contributions must be kept and the certificate requested by the electoral authority must be issued.

- Under no circumstances may they accept or request particular benefits, other than those provided for in current Colombian regulations, for making political contributions.

- The company will refrain from making contributions to political parties, organizations, or campaigns when it is in negotiations to establish a legal, contractual, or commercial relationship, or is already related to one.

- In development of this policy, the procedure for making political contributions has been established, which is described within ANNEX 3 - Interactive Map of PTEE Procedures.

6.6 DONATION POLICY:

Within the business group, the possibility of making donations on behalf of the company has been established. These donations may be in cash or in kind. In all cases, the following guidelines must be observed when making donations:

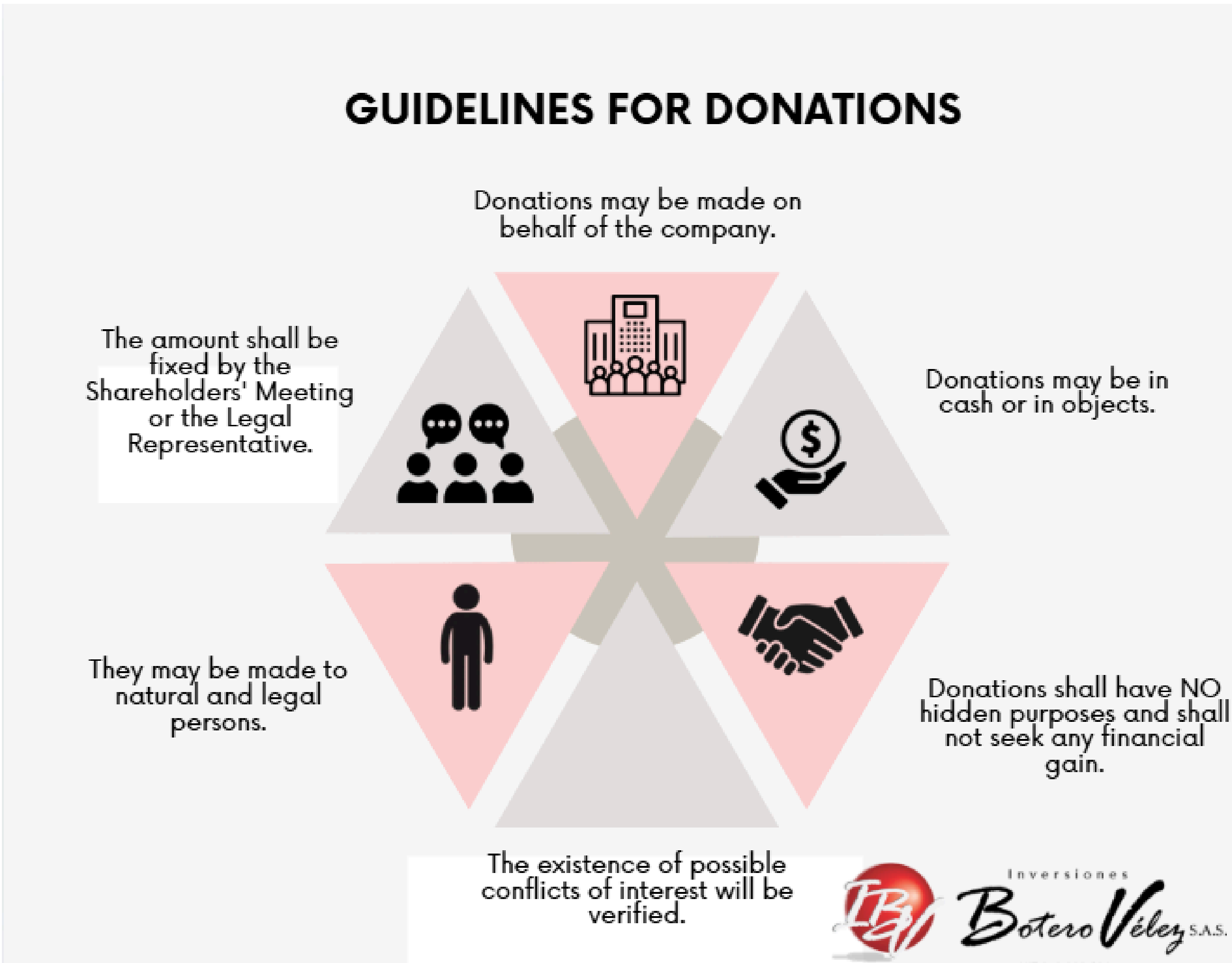
- The Shareholders' Meeting and/or main legal representative will define the amounts in money or their representation in kind in relation to donations.

- Donations can be made to any third party (non-profit organizations, legal entities, or natural persons).

- The existence or absence of conflicts of interest between the company, its shareholders or administrators and the beneficiary of the donation will be verified.

- At no time will the donation have hidden purposes or seek an economic benefit from the operation, other than those accepted by current regulations.

To make a donation, you must act in accordance with the procedure established in the Donation Procedure, described in ANNEX 3 - interactive map of PTEE procedures.



6.7 GIFT AND GRATITUDE POLICY:

As part of its business practices, the business group authorizes the granting of gifts on behalf of the company to third parties, in accordance with the following guidelines:

- Gifts are only permitted in kind and must be institutional or corporate gifts.
- Gifts may not be given to public officials.
- A maximum price of half the minimum wage (1/2 SMLMV) is established for institutional gifts.

- This value will be updated annually according to the Consumer Price Index (CPI), calculated, published and certified by the National Administrative Department of Statistics (DANE).

6.8 SPONSORSHIP POLICY:

Sponsorship is understood as the strategic collaboration between the business group and other natural and legal persons in order to provide logistical or economic support.

The support may be directed towards social, cultural, sporting, educational, or other projects to enhance or promote the company's image and values, and to contribute to community development. In order to prevent the risks of corruption and transnational bribery in its operations, the business group establishes the following rules:

- The company can sponsor.
- Employees of the company are prohibited from sponsoring businesses in their own name and using the company for that purpose.
- The Shareholders' Meeting must define and approve the maximum sponsorship limits.
- Due diligence must be carried out on the beneficiary of the sponsorship prior to the sponsorship.
- The existence of conflicts of interest with the sponsorship recipient must be examined. The business group will refrain from sponsoring any projects where risks of corruption or transnational bribery are detected.
- Should the authorities require it, all information regarding the sponsorship will be made available. Under this policy, a formal and detailed accounting record of all sponsorships must be maintained. When a sponsorship exceeds USD 1,000, the procedure for handling sponsorships exceeding USD 1,000, described in Annex 3 of this Manual, must be followed.

6.9 REPRESENTATION EXPENSE POLICY:

In order to provide security to the company's operations and prevent the risk of transnational corruption and bribery to which it may be exposed, the business group determines that representation expenses must have the authorization of the company's legal representative.

6.10 COMMISSION PAYMENT POLICY:

The following guidelines will be taken into account for the payment of commissions within the business group:

- Commissions are part of the company's business practices and are awarded to employees for their performance and achievement of goals.

- The justification for the commissions established by the company for its employees must be documented, indicating the motivation and the method of calculation.

6.11 POLICY ON LINKAGE AND/OR RELATIONSHIP WITH THE STATE:

In all interactions and relationships with public officials, private individuals exercising public functions, or any third party acting on behalf of and/or for the State, current regulations must be followed. In addition, the following guidelines must be taken into account:

- Any relationship or connection must be carried out within a framework of legality.

- Those acting on behalf of the business group must act reasonably, using common sense, and looking after the interests and needs of the company.

- The relationship must be governed by values of transparency, honesty and integrity.

- The objectives of the interactions must be clear and widely known by the parties. Interactions with hidden objectives are not permitted.

- The parties involved in the interaction must be clearly identified. The existing relationship on whose behalf they are acting must also be identified.

- If possible, at least two (2) collaborators and/or senior managers of the business group should be present during the interactions.

6.12 FACILITATING PAYMENT POLICY:

Within the business group, facilitation payments by shareholders, collaborators, and senior managers are prohibited; these consist of small, unofficial, and illegal payments made to obtain or expedite procedures such as licenses, certificates, permits, among others.

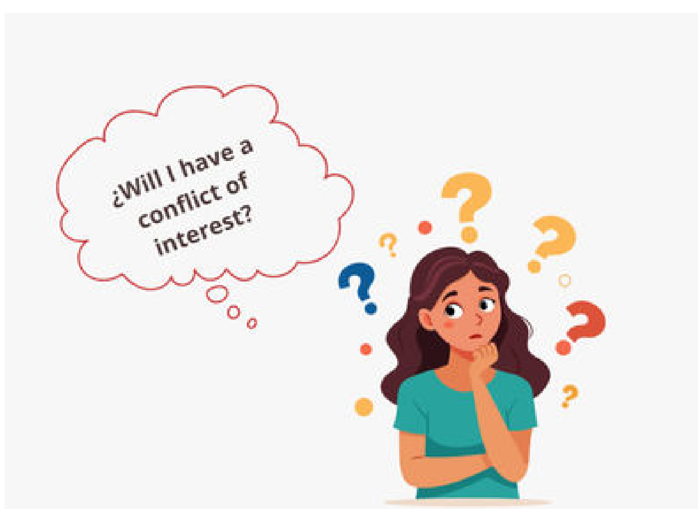
This prohibition is particularly relevant in relation to national or foreign public officials or private individuals acting in public capacity. The prohibition applies to actions taken both on their own behalf and on behalf of the corporate group.

Requests received from shareholders, employees, or senior management for facilitation payments must be reported immediately to the Compliance Officer. The report must be submitted within twenty-four (24) hours of the request. In accordance with this policy, the procedures outlined in the Reporting of Facilitation Payments, described in Annex 3 of this Manual, must be followed.

6.13 CONFLICT OF INTEREST POLICY:

Conflicts of interest are situations in which a person's private interests may prevent, or do prevent, them from acting objectively and independently in the performance of their duties. These interests can be economic, professional, relational, or employment-related, among others.

While such conduct is not illegal, actions or decision-making in the presence of conflicts of interest may constitute unethical business practices. Therefore, the company outlines its Conflict of Interest Management Policy in the guide entitled "Will I Have a Conflict of Interest?", which is included in this manual (Appendix 2) and is readily available to employees.



When a collaborator identifies that they are in a conflict of interest, they must act in accordance with the “Procedure for Reporting Conflicts of Interest” described in Annex 3 – Interactive Map of Procedures.

In addition to the guidelines set out in the aforementioned guide, the employees of the business group:

1. They must safeguard the company's interests while performing their duties. In their decisions, these interests must take precedence over any private interests that may arise between them and the company's interests.

2. When they find themselves in a situation of conflict of interest, they must declare the conflict using the form provided for that purpose.

3. They will refrain from acting or deciding when they find themselves in a situation of conflict of interest.

4. Situations of conflict of interest must be declared, even when the collaborator has acted or made a decision while the conflict existed previously.

5. Situations involving conflicts of interest must be declared, even if there is doubt as to whether one actually exists. In these cases, guidance can also be sought from the Compliance Officer, explaining the situation and the corresponding doubt.

If there is any suspicion that a company employee is involved in a conflict of interest, this fact should be reported through the reporting channels provided in this manual.

6.14 SANCTIONING POLICY FOR COLLABORATORS:

If an investigation reveals the involvement of any employee of the business group in conduct suspected of being related to workplace safety or in non-compliance with the policies and procedures established in this manual, an internal disciplinary process will be initiated. This process will be conducted in accordance with the provisions of the Internal Work Regulations established by the business group, ensuring the employee's right to defense and rebuttal.

The business group may remove the employee from their position or specific functions when it is determined that their performance may affect the proper functioning of the process, or the reputation of the company.

If there is sufficient evidence, the business group may impose its respective sanction on the employee or employees involved in the process, in accordance with the provisions of the Internal Work Regulations.

For the development of this policy, a Disciplinary Procedure for Non-Compliance with the PTEE has been established, described in Annex 3 - Interactive Map of Procedures.

6.15 POLICY ON COLLABORATION WITH THE AUTHORITIES:

The business group ensures transparent management in its relations with the authorities when requirements arise for the exercise of its functions.

In accordance with the above, the business group guarantees that any request submitted by an authority and related to the PTEE will be answered diligently and respectfully, providing all available support and information transparently, in compliance with its duty to collaborate with the authorities.

Given the above and in order to collaborate with the competent and control authorities, a document preservation policy is established for the safekeeping of the program's own documentation, as well as that related to the linking of clients and/or suppliers, which support the transactions carried out, and that which has served to determine an operation as unusual or suspicious.

In development of this policy, the Procedure for Handling Authority Visits and the Procedure for Handling Authority Requests have been established, described in Annex 3 - Interactive Map of Procedures.

6.16 INFORMATION RETENTION POLICY:

All information related to the activities carried out by the business group in application of the PTEE will be kept in accordance with the parameters established in Law 962 of 2005 on information retention. This retention period will be 10 years.

The Compliance Officer will ensure the preservation of the information, for which purpose the Information Verification Procedure, described in Annex 3 - Interactive Map of PTEE Procedures, will be followed.

Within the PTEE Program and as a result of each of the procedures and documents resulting from its implementation, Inversiones Botero Vélez S.A.S. must guarantee their proper storage and safekeeping. These records must be kept for a period of ten (10) years in accordance with the provisions of Article 28 of Law 962 of 2005, or the regulation that modifies or replaces it.

6.17 DISCLOSURE AND COMMUNICATION POLICY:

This Manual is disseminated by the business group to all interested parties through different tools and communication channels, ensuring that the published information is accurate, ethical and aligned with the values and objectives set out in this document. One of these dissemination channels is the company website: https://ibv.com.co/, thus facilitating easy and public access to the manual.

In furtherance of this policy, the Procedure for Disclosure of Programs to Stakeholder Groups has been established, described in Annex 3 - Interactive Map of PTEE Procedures.

7. REPORTING CHANNELS

The fight against workplace harassment and exploitation (WSE) depends on the proper and prompt identification of suspected such behavior. In this regard, it is crucial to provide the public with mechanisms to report these issues. That is, the company must offer easily accessible channels for reporting suspected WSE practices.

For these purposes, the business group has set up an ethics hotline via the email address lineaetica@mueblesalbura.com.co

Shareholders, senior management, employees, third parties, stakeholders, and any other interested party may use this channel to report any misconduct by C/ST that they are aware of, as well as raise questions about the criteria for defining such misconduct. Regarding the reporting channel:

- This tool should be used responsibly, for the purposes set out in the program.
- It is a tool for reporting, and clarifying concerns about reports, related to alleged transnational corruption or bribery conduct concerning the company.

The reporting channels will be easily accessible, must guarantee the protection of the whistleblower's identity, and ensure the integrity of the information. These channels will be widely publicized to shareholders, employees, senior management, and other third parties. Any changes to these channels will also be communicated.

In addition to the business group's reporting channel, individuals can also use the reporting channels of the Superintendency of Companies, which are as follows:

- Transnational bribery reporting channel: https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-de-Denuncias-Soborno-Internacional.aspx

- Reporting channel for corruption: https://anticorrupcion.gov.co/innovar/portal-anticorrupcion

Inversiones Botero Vélez S.A.S.
NIT 816.000.386-4

INTERNAL REPORTING CHANNELS

Correo electrónico:
lineaetica@mueblesalbura.com.co

EXTERNAL REPORTING CHANNELS

1. Transnational bribery whistleblower channel: https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal- de-Denuncias-Soborno-Internacional.aspx

2. Corruption reporting channel: http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion

Regarding the complaints:

1. It is the obligation of shareholders, collaborators, senior managers and third parties linked to the business group to report any acts of transnational bribery, corruption or related acts of which they are aware.

2. Complaints may be made with identification or anonymously. When the complainant's identity is known, it will be kept confidential to prevent retaliation from the accused and/or third parties.

3. A written record of all complaints filed must be kept. This record must be properly documented.

4. All complaints received must be brought to the attention of the Compliance Officer. No more than thirty (30) days may elapse from the date of becoming aware of the complaint before such notification is made.

5. Once the complaint is received, the procedure outlined in the "Investigation Policy" of this manual will be followed.

8. VALIDITY

This manual of the Business Transparency and Ethics Program (PTEE) will come into effect on September 9, 2026, as approved by the minutes of the Shareholders' Meeting of 2026.

Modifications, deletions, or additions will take effect one (1) calendar day after their publication. The Business Transparency and Ethics Program must be updated at least once every two (2) years.

9. ANNEXES

- PTEE risk matrix (annex 1).
- Interactive map of PTEE procedures (Annex 2)
- Guide to conflicts of interest (Annex 3)
- Catalogue of warning signs (Annex 4)