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CODE OF ETHICS AND BEHAVIOR

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1. PRESENTATION OF THE CODE OF ETHICS AND BEHAVIOR

1.1 Objective

The objective of this Code of Ethics and Behavior is to have a set of principles and rules of action before the stakeholders of TESICOL SA, so that all the people who make up the Company proceed in a manner consistent with the values, policies and objectives general of it.

The stakeholders of TESICOL S.A. are:

- Customers.
- Suppliers.
- Contractors.
- Workers.
- Board of Directors.
- Shareholders.
- Society.
- The state.

1.2 Scope

The scope of the Code of Ethics and Behavior of TESICOL S.A. is part of the guiding ideas of the Company, described in its mission and vision, compliance with its principles and organizational values by each of the people who make up the Company and evidenced in daily actions.

The Code of Ethics and Behavior contributes to generating a culture of respect, responsibility, commitment and discipline in all acts related to the management of processes and relationships with stakeholders.

The code is a reference for the actions of TESICOL's Senior Management, Administrators and Collaborators and is an integral part of the employment contract between TESICOL S.A. and employees.

For the purposes of this code, the members of the Board of Directors, as Administrators, the Presidency and substitute and Collaborators, all workers including students in practice and apprentices of TESICOL are understood as Senior Management.

Failure to comply with this Code of Ethics and Behavior by any employee implies the application of the sanctions established in the Collective Labor Agreement, the Substantive Labor Code, the Colombian Penal Code, the Labor Contract and the Internal Labor Regulations, independent of the sanctions that the Law establishes.

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1.3 Principles for good working relationships

- Work relationships between employees must be based on harmony, conceived as equity, respect, understanding and constant evolution, between the presidency, workers, contractors, clients and suppliers.
- The interests and actions of the Company's shareholders, Senior Management, Administrators and Collaborators must be directed to the fulfillment of the strategic objectives of the Organization through controlled processes under the principles of efficiency, effectiveness and continuous improvement, respecting the integrity of the people, promoting their personal growth and in harmony with the environment.
- The Human Management area must lead the development of an organizational culture based on justice, harmony, respect and control, which supports successful operational results, within a framework of economic, human, social and ecological reasonableness.

1.4 Corporate Values

Integrity: We demand in our daily conduct to act with integrity, that is, to do the right thing. We safeguard the resources of the Company, we comply with all the rules, policies, principles and regulations that govern TESICOL. We promote tolerance for diversity, fair treatment, trust and respect.

Excellence: We act and carry out our work exceeding in a positive way our own expectations, those of our internal and external clients. We seek to be better every day.

Discipline: We always act in an orderly and persevering manner to achieve our organizational and personal goals. We fulfill our commitments and take responsibility for our actions and their results.

Respect: We always value the other as a human being without discrimination. We are tolerant of differences and individuality and we adhere to ethical and moral principles.

Austerity: We make the best use of material and intangible resources. We take care of our own and others' things so that they provide a better service.

Cooperation: We recognize the active participation of people as members of a team, committed to activities and results; we seek synergy and relationships between contributions, being able to reconcile apparently extreme or dissimilar positions, directed towards the fulfillment of common objectives.

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2. RESPONSIBILITIES REGARDING THE CODE OF ETHICS AND BEHAVIOR

Board of Directors:

Adopt the policies of the Code of Ethics and Behavior, order its compliance, instruct the administration on its compliance, set an example in its application and approve any pertinent updates in a timely manner.

Presidency:

Direct the implementation of the policies approved by the Board of Directors in relation to the Internal Control System.

Audit Committee:

Evaluate the internal control structure of TESICOL, of which the Code of Ethics and Behavior is an integral part, as well as its application and continuous improvement.

Human Management Directorate:

Disseminate the obligation that collaborators have to maintain an organizational culture supported by the values that govern TESICOL, as well as publicize the Code of Ethics and Behavior in induction programs to new employees and give instructions to generate the certification of read and commit application.

Likewise, advance the procedure established for the event of breach of this Code and for the resolution of conflicts of interest of collaborators, in accordance with the provisions of the same.

Managers, Directors, Coordinators and Supervisors:

Ensure the observance of the Code of Ethics and Behavior; advise collaborators in cases of ethical or interest conflicts, so that they can make the most appropriate decision and, if applicable, consult with other bodies, when it considers that it is not possible to give the appropriate advice; report to the Human Management Directorate, or the area that takes its place, the non-compliance by the employees in charge of the precepts contained in this Code.

Internal audit:

Ensure compliance with the principles and standards of ethics and behavior throughout the Company, through audit programs through which their application is evaluated, reporting non-compliance to the human management department, or the area that takes its place.

In the same way, make known to the Audit Committee those cases that warrant it and propose the improvements that it deems appropriate.

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Purchasing Coordination:

Make known to contractors and suppliers the Code of Ethics and Behavior, at the time of the relationship and where possible, that they act in accordance with its precepts.

Commercial Management:

To make the clients aware of the Code of Ethics and Behavior, at the time of linking and where possible, that they act according to the stipulations.

Compliance Officer or whoever acts its:

Coordinate the updates of the Code of Ethics and Behavior, its approval, monitoring of its compliance by TESICOL collaborators and annual disclosure to suppliers and clients.

Additionally, the Compliance Officer or whoever acts in his or her role must ensure the operation of the Self-Control and Risk Management System for Money Laundering and Terrorism Financing (SAGRLAFT), as a component of TESICOL's internal control system.

All collaborators:


Know and put into practice in all its actions the provisions of the Code of Ethics and Behavior, having to commit to its compliance and assume the consequences in case of non-compliance.

Likewise, report in writing and immediately to the Human Resources Directorate, any behavior that it knows violates the provisions established in this Code of Ethics and Behavior by the persons obliged to comply with it.

3. COMMITMENT TO THE INTERNAL CONTROL SYSTEM

To ensure the effectiveness of the internal control system, TESICOL's Senior Management, Administrators and Collaborators must commit to the following:

- Evaluate and control their work, detect deviations and carry out corrections in the exercise and fulfillment of their functions, as well as improve their tasks and responsibilities, all in order to comply with the objectives set by TESICOL.
- Recognize the importance of the management system by processes, the internal and external audit, the statutory audit and the established committees.
- Facilitate and provide in a timely manner all the information and documentation that the control bodies require for the fulfillment of their functions. as well as any requirement that arises as a result of audits or inspections, with the diligence and honesty that they deserve, in the manner and within the terms established by the agencies that issue them.

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- Implement the actions recommended by the control bodies that have been agreed with the areas, as well as the provisions adopted by the general management and by the administrative and financial area, to improve controls.
- Know the economic activity carried out by its clients and suppliers.
- Keep confidential reports that are issued.
- Comply with and enforce within its competence, the recommendations and suggestions delivered by the control bodies.
- The requirements that arise from the claims of the clients must be attended with the speed and opportunity that guarantee the client's satisfaction.

4. OTHER ASPECTS OF INTEREST

- The accounting books, financial statements, accounting accounts and reports issued by TESICOL must be exact and reflect truthfully the reality.
- The reports issued responding to the requirements of any competent authority, must correspond to the truth and reality of the requested information.
- No person may issue or receive vouchers (invoices, receipts, etc.) for amounts greater or less than the true value of the transaction carried out, nor issue certifications, receipts or documents with annotation of concepts other than those actually recorded in the books and media of operations.
- The Senior Management, Administrators and other Collaborators of the Company must refrain from participating by themselves or through a third party in the interests of personal or third parties, in activities that imply competition with the Company or in acts with respect to which there is a conflict of interest. Except with the express authorization of the competent authority, in accordance with the procedure indicated in this code.

5. COMMITMENT OF TESICOL IN THE FACE OF MONEY LAUNDERING AND TERRORISM FINANCING

TESICOL will avoid, in accordance with its knowledge and possibilities, being used to hide and manage resources from illegal activities.

The administration, managers, directors, coordinators and other collaborators must be aware of the company's policies for the prevention of money laundering and terrorist financing established in the Manual of the ML / FT Risk Management and Self-control System and it is their obligation to control that these provisions are respected.

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6. ETHICS AND COMMITMENT TO BUSINESS RISKS

6.1 Collaboration with the competent state authorities

TESICOL S.A. Its policy is to collaborate with the authorities by attending to the requirements and supplying the information that is required by state agencies within the formalities required by law, complying with the following precepts:

- Provide information to the competent authority only through the Legal Representative or his alternate.
- The information provided must be absolutely true and must be duly documented in the filing system that the Company has.

6.2 Commercial Behavior

- The conditions and interest rates for advances, loans, interest on arrears, portfolio refinancing, etc., must be approved by the Presidency and in no case may they affect the Company's equity unless expressly authorized by the Board of Directors.
- In the negotiations carried out with third parties, the limits authorized by the budget and the powers determined by the statutes will be taken into account. In this sense, no credit may be granted, negotiated or signed contracts, purchases or, in general, any kind of operation that is outside its level of attributions.
- Investments that arise during the budget execution period, budget additions or significant unforeseen events must have the approval of the Presidency or the Board of Directors, as the case may be.
- The Company's Employees must disclose all the information that they know and consider relevant, which may constitute a risk for TESICOL S.A. in relation to its clients, suppliers and the same employees.
- Customers must be served promptly and efficiently.
- It is not allowed to receive gifts or commissions from clients, suppliers or employees as consideration for decisions, contracts or procedures.

Directors and Employees related to the negotiation and execution of contracts, acquisition of goods and services must be free from the influence of personal or commercial interests that could interfere with the interests of the Company.

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6.3 Ethics standards in treasury

- Treasury transactions must be conducted with loyalty, clarity, transparency, precision, commercial probity, seriousness and compliance both for clients, as well as for the Company and with financial entities.
- All determinations adopted in the operation of the treasury must be framed within the principles of timeliness, compliance, impartiality, integrity, transparency and security of transactions.

6.4 Standards of business ethics

The Senior Management, Administrators and Collaborators of the Company will be directed to act ethically and loyally in the operation. By virtue of this they must refrain from:

- Use the symbols of other companies for disrespectful acts of any other nature that affect their image or good name.
- Use any practice of unfair competition or restriction of competition.
- Reveal confidential information about the Company's clients, operations or administration to third parties.
- Intervene in the execution of contracts with suppliers or contractors, with which there is a personal interest of any kind.
- Put the observance of ethical principles before the achievement of commercial goals in order to avoid that the Company is compromised in facts that affect its reputation, credibility and trust.
- Carry out any operation that gives rise to conflicts of interest due to the privileged information to which one has access in the exercise of the functions.
- Promote the company, its products or its workers, detracting from other related companies or their products.
- Verification of agreements. Due to the complexity of the antitrust legislation, all agreements with competitors or third parties, which may have a negative effect on competition, must be verified by legal advisors.

Among the clauses that could have a negative effect on competition are the following:


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- a. Exclusivity clauses
 - b. Pricing clauses
 - c. Association clauses
 - d. Territorial restrictions
 - e. Price discrimination
- Prohibited agreements and conventions. Agreements between competitors whose purpose is to coordinate their behavior in the market are prohibited. These include:
 - ✓ Pricing agreements
 - ✓ Sales agreements that limit the type of products that can be offered or that link product purchases to other purchases.
 - ✓ Agreements on the distribution of the territory, types of clients or production quotas.
 - ✓ Agreements to carry out a boycott, for example refusal to supply or to receive deliveries.
- Employees who are in charge of reviewing invoices or collection accounts from suppliers must make every effort to review and verify the amounts collected, protecting the interests of the Company.
- In negotiations carried out with third parties, the limits authorized in the TESICOL policy on amounts and attributions will be taken into account. In this sense, it will not be possible to negotiate or sign contracts, make purchases or in general carry out any kind of operation that is outside its level of attributions.
- Employees of the Company must disclose all information to know and consider relevant, which may constitute risk to TESICOL S.A. in relation to its clients, suppliers and the same employees.


6.5 Rules of Conduct for Administrators and Collaborators

The Presidency, Managers, Directors, Coordinators, Supervisors and other administrative and operational personnel must comply with the following standards of behavior during their performance:

- Act in good faith, with loyalty and diligence in the development of its management, always ensuring the protection of the interests of the Company.
- Comply with the provisions contemplated in the law, the bylaws, internal regulations, employment contract, this Code of Ethics and Conduct and other provisions of a legal or internal nature that are applicable.

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- Know and comply with the principles that govern the internal control established by TESICOL.
- Maintain absolute respect and correct treatment with hierarchical superiors, co-workers, clients, contractors, suppliers and other interested parties.
- Comply with the commitments with the Company and with third parties, in order to avoid sanctions or reports that deteriorate its good name and could affect the good image of TESICOL.
- Act with neutrality towards shareholders, since it is the company's policy to treat all of them equally.
- Not to carry out or cover up activities that are contrary to the law or ethics or that may compromise the name or prestige of the Company, either through direct actions in the performance of the functions of the position or indirectly.
- Not to use the name TESICOL or the attributions associated with the position in the performance of personal activities and refrain from carrying out all those that interfere with the work schedule, their performance or the fulfillment of their duties.
- Carry out efforts leading to the proper development of the corporate purpose.
- Ensure that the proper performance of the functions entrusted to the statutory auditor and internal and external audits is allowed. This includes the diligent response to the requirements of the same once announced or requested.
- Refrain from misusing inside information.
- Refrain from participating by oneself or through an interposed person in the personal interest or of third parties, in activities that imply competition with the Company or in acts with respect to which there is a conflict of interest (Art. 23 of Law 222 of 1995).
- Respect copyright and intellectual property. Therefore, among other aspects, they will refrain from using computer equipment to install programs or software whose license has not been acquired in the name of the Company. It is mandatory for all employees to know and follow all the rules and procedures stipulated in the TESICOL IT Security Policy.
- Do not sign documents, do not give authorizations, or dispose of company assets for which you are not authorized.

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- The credits, advantages and benefits that are received by the fact of being an employee, cannot be used in favor of other people.
- Respect and not discriminate against any person, partner, clients, contractors or suppliers for differences of sex, religion, race, political inclination, nationality, social level or hierarchy.
- All workers must collaborate in the investigations carried out to resolve any improper or illegal act that affects or may affect the interests of the Company.
- Comply with the security standards issued by TESICOL, taking into account that access codes to safes, bank portals, internal systems (SQL payroll, QAD, Consultation to risk centers, among others), network entry or access are personal and non-transferable and for no reason should they be loaned. Each official is responsible for the operations carried out with his user.
- Respond for the values, documents, manuals, personal protective equipment, computer equipment and elements that were assigned for their management or are under their responsibility in relation to their functions.
- Provide in a clear, complete and accurate way the personal and family information that is required by TESICOL.
- Not request, demand, receive or accept, directly or indirectly, gifts in kind or in money, invitations, favors, donations, loans, services or any kind of benefit, in a way that could affect the objectivity in the taking of decisions of the position or compromise compliance with the general rules of conduct. Gifts and hospitality in general that are carried out in the development of a business relationship and therefore do not compromise the objectivity and independence of the official are excepted from this prohibition.
- It is not allowed, as a general rule, that spouses, permanent partners, or relatives within the third degree of consanguinity, second degree of affinity and only civilian work simultaneously in the Company. However, the Presidency may decide on their permanence, after analyzing mitigating circumstances such as the degree of employment relationship that exists between those in that situation, the area of work and the impact of said positions on the results of TESICOL.
- Serve clients efficiently and promptly, in accordance with established procedures, without being able to receive retribution or favors for the fulfillment of this duty.
- The expenses for travel, lodging, food and social services must be reasonable,

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authorized by the corresponding levels and must be duly legalized within the month of occurrence, remaining with sufficient supports.

- It is not allowed to use authority or influence to give preferential treatment to a client, supplier or contractor, which implies disregarding the internal rules of the Company.
- Neither will a client's requests be acted upon, when it is known or reasonably suspected that the purpose is to evade applicable laws or regulations.
- Refrain from carrying out operations that are expressly prohibited.
- Employees must use their good judgment and common sense in all situations in which legal requirements or correct business practices are not clear, requesting advice and guidance from their hierarchical superiors.

7. CONFLICT OF INTEREST

Are those situations in which the integrity of an action leads Senior Management, Administration and the Collaborator to have to decide between acting for the benefit of the entity or for their own benefit.

Self-benefit is understood as the derivative of any decision for the benefit of the collaborator, his spouse, partner or permanent partner or his relatives within the second degree of consanguinity, second degree of affinity or first civil or his partner or partners in fact or law.

7.1 General policies

The policies defined below must be observed in order to ensure that proper management is exercised to prevent and detect eventual conflicts of interest.

- Senior Management, Administrators and Collaborators must be free from the influence of personal or commercial interests that could interfere with TESICOL's interests.
- Senior Management, Administrators and Collaborators must avoid direct or indirect commitment in any situation in which they may have a conflict with the interests of the Company.
- The policy of TESICOL S.A. is to prevent and control situations that may lead to a conflict of interest on the part of its employees.

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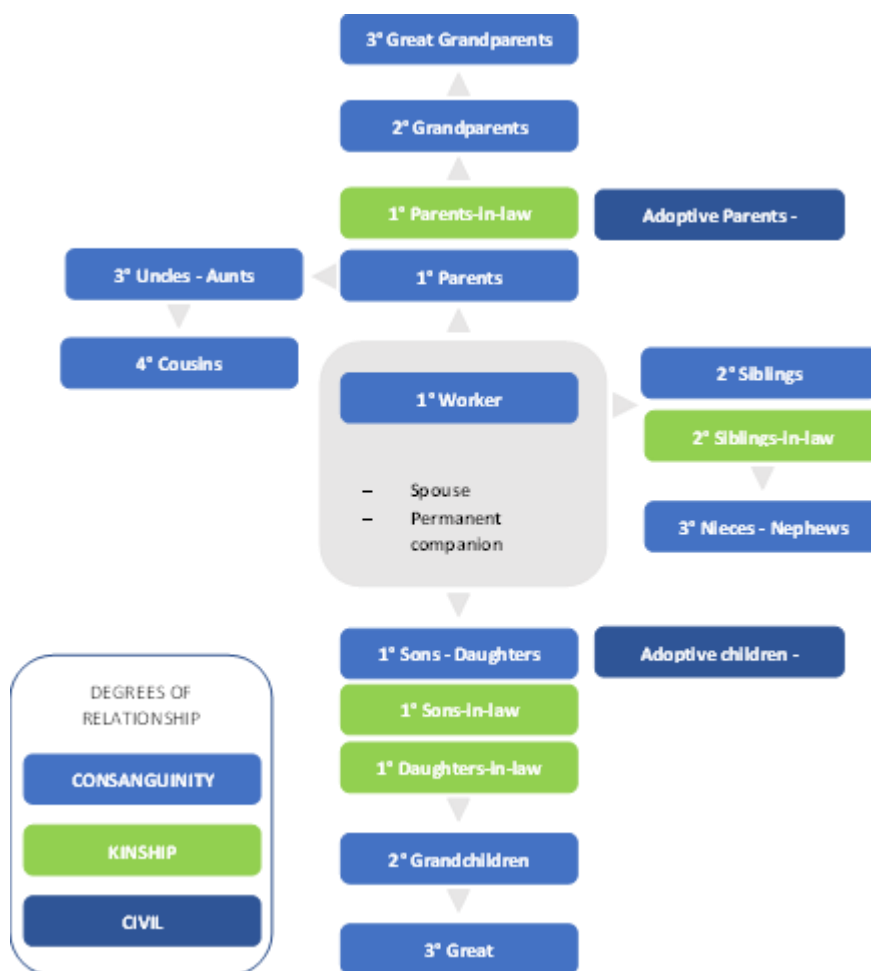
- d. The law and the doctrine establish mechanisms to face situations that generate real or potentially conflicts of interest, which may be used by TESICOL, depending on the circumstances for each case.
- e. TESICOL must refrain from carrying out operations that are expressly prohibited or that involve conflicts of interest, when the conflict cannot be overcome, or when there are doubts about the clarity of the operation.

7.2 Disclosure of conflicts of interest and procedure for their evaluation and management

Each time it is required to link a new collaborator to the Company, it will be requested that the conflict-of-interest form P-PRE-01 be filled out, which will be verified by the human management department; In case of evidence of a conflict of interest, this situation will be communicated to the presidency or the audit, ethics and risk committee - AER (or whoever acts as its substitute) in order to define how to proceed with the hiring.

The Senior Management, Administrators and Collaborators of TESICOL, must disclose any conflict between their personal interests and the interests of the Company, when dealing with clients, suppliers, contractors or any person who has or intends to maintain commercial or any other kind of relationships with the company in which it has a stake or interest, directly or indirectly.

In particular, the Senior Management, Administrators and Collaborators of TESICOL must make known the operations that involve their spouses, permanent companions or relatives up to the second degree of consanguinity, second degree of affinity and only civil; when operations create conflicts of interest or any appearance of it and take the appropriate steps to avoid it.



Senior Management and Administrators will disclose the conflict to the Board of Directors. The Collaborators before the Human Management Directorate or the agency that takes their place.

The human management department will annually request confirmation of the absence or presence of a conflict of interest on the part of the collaborators, through the conflict-of-interest form (P-PRE-01).

Once the disclosure has been made or the conflict has been identified, the following procedure will be carried out:

- i. If the conflict of interest involves an employee, the Human Resources Department:
 - Communicate to the Audit, Ethics and Risk Committee - AER (or the one acting in its stead) in order to evaluate situations of conflict of interest and determine the actions applicable to each case.

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- Once the conflict is analyzed, the decision taken will be informed to the human management department, so that it communicates it to the collaborator and his immediate boss.

- The Human Resources Department will keep a record of the disclosures of conflicts of interest and will keep the documentation related to them.

- ii. In the event that the conflict of interest involves a member of the Board of Directors or the Presidency, the latter must disclose the situation to the Board of Directors and will order the convocation of the General Assembly of Shareholders in order for it to authorize, if deemed necessary. appropriate, the performance of the activity that represents the conflict of interest, in accordance with the provisions of paragraph 7 of article 23 of Law 222 of 1995, in accordance with the provisions of Decree 1925 of 2009 or the regulations that modify them or substitute.

In all events, the competent body, either the General Assembly of Shareholders or the Board of Directors, when making the decision, must not lose sight of the fact that the well-being of the Company is the main objective, which is why there will be room for the authorization, only when the act does not harm the interests of the same.

7.3 Special situations

7.3.1 Composition of the Board of Directors

In compliance with the provisions of article 435 of the Code of Commerce, a majority of any one formed by people linked to each other by marriage, or by kinship within the third degree of consanguinity or second of affinity or first civil, may not appear on the Board of Directors of TESICOL., a situation that is only allowed in societies recognized as family. If a Board is elected contrary to this provision, the previous Board will not be able to act and will continue to exercise its functions, which will immediately call the meeting for a new election. Decisions adopted by the Board with the vote of a majority that contravene the provisions of this article will be ineffective.

7.3.2 Business with agents or administrators

For those who have the status of agents or administrators, it is a situation that generates conflicts of interest, acquiring or benefiting from the businesses they represent, in accordance with the provisions of the Commercial Code.

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8. PROHIBITED AND CONTROLLED PRACTICES

8.1 Prohibited practices

For the purposes of this Code, the following are considered prohibited practices:

a) Competition with the Company.

Managers and employees should not put themselves in a position of competition with the Company

The following are some activities that are classified as such:

- ✓ Make use of the position to hinder the Company from the legal exercise of competing with others
 - ✓ Divert business from the Company.
 - ✓ Receive commissions from third parties for actions related to the management of the Company's processes.
- Take advantage of or obtain their own benefit in any inappropriate way, directly or indirectly in activities that impair or affect the interests of the Company

b) Abuse of Functions

The Administration and the Collaborators of the Company may not obtain favorable treatment for the purchase or sale of assets or products on their own account, their family or their related.

c) Gifts and Tips

The collaborators of TESICOL S.A. avoid receiving gifts in kind or cash, loans, materials, services, repairs or improvements free or at prices below the market; travel, gifts from any organization, firm or individual doing or seeking to do business with the entity.

d) Relationship between workers

As a general rule, it is not desirable that married couples, or relatives within the third degree of consanguinity, second degree of affinity and only civil (adoption) work simultaneously in the same Department or area or in processes directly related to each other. However, in each case, the Presidency will decide after analyzing extenuating circumstances such as working conditions in the region, level of authority and responsibility of the positions, the degree of labor relationship that exists between the

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related collaborators, the geographical location of their positions and the impact of these positions on the Company's results.

e) Bribery and complicity to evade laws

No worker will accept on behalf of the Company or offer any commission, consultant or rebate agreement, service, bribery, or "bribe" or otherwise to obtain a benefit for the Company, retain a business, evade a legal obligation.

f) Legal breach

No employee of TESICOL S.A. will comply with requests from a customer, supplier, neighbor or any person, when it is known or reasonably suspected that the purpose is to evade applicable laws or regulations.

8.2 Controlled Practices

The Board of Directors must authorize in writing:

- ✓ The entailment of a manager or employee who has financial or other interests with individuals or companies with whom the Company does or is trying to do business, be these significant contracts, investments, mergers or acquisitions or the purchase of assets, goods or services of importance.
- ✓ To the workers of TESICOL S.A. to serve as a member of the Board of Directors or advisor to commercial, industrial or financial organizations that affect the interests of the Company or its shareholders.
- ✓ The use of information-processing equipment, radio equipment, photography equipment and electronic equipment in general owned by the Company in activities other than their own work that each one performs within the Company must inform and request express authorization from the Immediate Chief.

9. PRIVILEGED OR RESERVED INFORMATION

9.1 Concept and generalities

By information subject to confidentiality or privileged, it should be understood that to which only employees have direct access due to their functions, which by its nature is confidential, since if known it could be used in order to obtain profit or benefit for who supplies it or for a third party. Special mention should be made of projects, investigations, processes, procedures, plans, documentation classified within the system, maps, photographic material, which have been declared as such and the information related to the improvement program in general and resumes and

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personnel information, unless it has been determined by the Presidency that it is information that can be declared public.

Confidentiality is one of the most important elements of information security and its purpose is to guarantee that it can only be known, consulted and disclosed by authorized persons.

It will also be privileged or confidential information, any other type of information that the legal provisions qualify as such.

TESICOL recognizes the strategic value of information and, for this reason, has policies for its preservation, management and use.

9.2 Duty of Confidentiality and Reservation

The Senior Management, Administrators and Collaborators of TESICOL must keep the due confidentiality of the information. Therefore, they should not:

a) Disclosing or communicating to unauthorized persons:

- The information of the Company or customers, related to its plans, policies, acquisitions, financial statements, customer contact details, earnings, marketing strategies and business opportunities.
- The reports of visits made by audits, Statutory Auditor or related.
- The applications or information systems, keys and material information that may influence the actions of the company or that expose its security, that of its collaborators or clients.

b) Make comments in public places or places that endanger the privileged or reserved information of TESICOL.

c) Receive benefits for information to which they have had access in the performance of their duties.

d) Use confidential information regarding clients, presidency, collaborators, suppliers, contractors and others, including information that is kept in electronic form and professional secrets except in the cases provided by Law or requirements of entities or persons that have the competition to do them.

e) Access or use information for which you have not been authorized.

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f) Provide information by telephone, fax, email and other means, when the applicant's identification cannot be validated.

g) Provide privileged or reserved information without the order of a competent authority.

h) Reveal information that gives a competitive advantage to third parties on offers, quotes, prices and proposals.

i) The access codes to the computers are personal and non-transferable and for no reason should they be loaned. Each collaborator is responsible for the operations carried out with their user.

The mechanisms to guarantee compliance with the previous provisions will be those contained in the Information Security Policies and protection of personal data

The obligation of confidentiality and reservation of information by senior management, administrators and collaborators in the exercise of their functions will subsist even when they have stopped providing their services to TESICOL.

10. CHARGES THAT MAY DELIVER RESERVED INFORMATION

The following charges are those authorized to supply reserved information:

- **Presidency:** It is the only one that can deliver information subject to reservation.
- **Accounting and Financial Area:** The area provides information on clients by responding to the official letters issued by the different State authorities.
- **Administrative and financial management:** Deliver information related to personnel by means of a written response to the requirements issued by judicial authorities or state entities with competence to request it

11. INTELLECTUAL PROPERTY

Collaborators must properly use the name and brand of TESICOL.

Inventions, intellectual creations and improvements in processes, as well as all the work and consequent results in the activity of the Presidency and Collaborators or when, due to the nature of their functions, they have had access to secrets or confidential investigations, will remain the exclusive property of TESICOL. In addition, the latter will have the right to patent those inventions or improvements in their name or on behalf of third parties, for which the collaborators will agree to facilitate the

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timely knowledge of the corresponding formalities and to give their signature and extend the powers and documents necessary for this purpose, according to and when requested by the Company, without it being obliged to pay any compensation.

12. COMMUNICATIONS PROTOCOL

In order for there to be a transparent and responsible handling of communications, which avoids any type of confusion in the general public, TESICOL collaborators must take into account the following communications protocol:

- a) The opinion of TESICOL. It will be expressed to third parties and the media exclusively by its President or those persons that he explicitly authorizes to do so. In any case, under no circumstances may the name of the Company be used. to issue statements on issues other than those of the company's corporate purpose or related to it.
- b) Workers must refrain at all times from spreading rumors, inaccurate or false versions by any oral or written means. In case of doing so, the damages that are caused will be your sole responsibility, without prejudice to the actions that may be taken against you for breach of the duties in your charge.

13. ACTIONS FOR NON-COMPLIANCE

13.1 Institutional

Without exception, all the employees of TESICOL S.A. They are obliged to comply with the rules and policies contained in this Code of Ethics and Conduct. In case of non-compliance or violation of the same, the following will proceed:

Any employee who knows of an act of non-compliance or violation of the Code of Ethics and Conduct without exception has the obligation to report it to the Human Management Department, which will immediately proceed to carry out an investigation and request a written report of the situation from the person involved. and if appropriate, the disciplinary process will be initiated in accordance with the provisions of the internal labor regulations, current collective labor agreement, the employment contract and the law.

The foregoing, without prejudice to the criminal, administrative, civil or other actions that the breach gives rise to.

For the qualification of the faults the following criteria will be taken into account:

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Slight faults:

Actions or omissions will be considered minor offenses when:

- a) They have been presented unintentionally.
- b) They have not generated serious exposures or losses for TESICOL.
- c) They are rectifiable.
- d) The action or omission has been incurred as a consequence of an erroneous interpretation of a legal, statutory, or regulatory norm of the Company.

Serious misconduct:

Actions or omissions will be considered serious offenses when:

- a) They have been carried out with the positive intention of violating the interests of TESICOL or causing damage to its good name, shareholders, clients or collaborators.
- b) They have caused serious exposures or losses for the Company.
- c) They are not repairable, so that they represent serious consequences for TESICOL.

13.2 Procedure and measures in case of infractions by the members of the Board of Directors

It is the responsibility of the Board of Directors to be aware of possible infractions due to non-compliance with the Code of Ethics and Conduct by any of its members. The Board of Directors will not impose sanctions, but if it considers that there is an infringement, it will inform about such fact in the report to the General Assembly of Shareholders.

13.3 Other actions

Other legal actions that may arise due to non-compliance with the provisions of this Code of Ethics and Behavior.

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14. DECLARATION OF KNOWLEDGE AND COMMITMENT TO COMPLIANCE


TESICOL's Senior Management, Administrators and Collaborators are responsible for complying with and understanding what is established in this Code of Ethics and Conduct within their specific areas of responsibility and supervision.

Upon entry of any official to the Company, they will be required to certify their knowledge of the content of this document. In the same way, they must subsequently certify their knowledge when there are updates or when the company so provides.

15. CHANGE CONTROL

This table lists the date, version and a summary of the change that justifies the change of version of the document.


DATE	VERSION	NATURE OF THE CHANGE
	1	Initial establishment of the code
26 TH -July-2017	2	Code update
16 TH -December-2019	3	1. It includes the audit committee, internal audit, purchasing coordination, commercial management and compliance officer or whoever acts as their substitute in numeral 2. Responsibilities towards the code of ethics and behavior. 2. The general principles that must be observed in the face of conflict of interest are adjusted to 7.1 General policies of conflict of interest 3. The numeral "mechanisms to face situations that generate conflict of interest" is eliminated and it is replaced with numeral 7.2 Disclosure of conflicts of interest and procedure for the evaluation and management of the same. 4. A graph of degrees of kinship is included 5. Numeral 7.3 special situations is included 6. Numeral 9.2 Duty of confidentiality and reserve is included, within item 9. Privileged or reserved information. 7. Item 12 is included. Communications protocol 8. The title "sanctions" is replaced by "actions for non-compliance" and sub-numerals 13.2 Procedure and measures in case of infractions by the members of the Board of Directors and "13.3 other actions" are added. 9. Shape improvements are made.

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SIGNATURES

This document was reviewed and approved at the Board of Directors on December 16th, 2019.

ELABORATED BY		REVISED BY
POSITION	ORGANIZATION AND METHODS COORDINATOR	PRESIDENT
NAME	ANDREA TATIANA REYES NAVAS	MARIA ALEJANDRA GÓMEZ MORALES

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READING CERTIFICATION CODE OF ETHICS: CG - 02 Code of Ethics and Behavior

Hereby, I _____ identified with ID No _____
expressly state that I read the company's code of ethics and conduct and I promise
to practice it and be a multiplier of it in the group of people in charge.

Sincerely,

Signature: _____

Name: _____

ID: _____

Position: _____