

This is who we are,  
This is how we coexist

# **CODE OF CONDUCT**

Employees

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## TO OUR EMPLOYEES

Since the origin of our Organization over 90 years ago, the founders' interest in creating companies based on principles and values that respect the dignity of each individual has been clear. Today, we continue to operate with a conscious respect towards our employees, their families, and the surrounding community, guided by this legacy.

It is with immense pride that we present our Corporate Code of Conduct, a set of guidelines that will govern all business actions of those who work in our companies from now on.

The high ethical standards that have characterized the Organization have been determining factors in the growth of the Company. We aim for the principles of perseverance, honesty, possibility, optimism, and social responsibility to become the foundation at all levels of the Organization, creating a pleasant, healthy, and competitive environment.

We hope that each recipient of this Code will use it as a guide to improve themselves every day in their work and personal development. Each individual is responsible for ensuring compliance, considering that its proper application contributes to protecting the interests of the Company and all those who are a part of it.

An individual's ethical attitude does not depend on the rules governing them or the fear of punishment, but on how they value themselves and those around them.

By acting in accordance with this Code, each of you will make an important contribution to consolidating our Company as a dignified organization with a sense of social responsibility and the prosperity that has always characterized it.

Sincerely,

**Luis Fernando Restrepo E.**  
CEO

## A. Our Values:

Our Company is based on 5 defined values that support our vision:

1. Perseverance: We insist on achieving our objectives without giving up in the face of obstacles.
2. Honesty: We act with ethics and transparency.
3. Possibilism: We make things happen with practical solutions.
4. Optimism: We are positive and realistic in every situation that arises.
5. Social awareness: We are aware of the responsibility we have to ourselves and the environment.



## B. Our Conduct:

The provisions contained in this document are applicable to all our employees, regardless of the type of employment relationship or contractual bond they have with our Organization and their position within it. This document is the reference framework for any activity we conduct in the Company, in the course of our duties.

We will strengthen the dissemination and compliance with the provisions of this code among our employees, contractors, consultants, suppliers, customers, and shareholders, seeking their commitment so that all our actions are based on the values of our organizational culture.

## C. Compliance with Laws and Regulations:

We will always comply with the laws and regulations that govern the countries where we operate. All employees must respect, comply with, and adhere to the governmental laws and regulations of each country; likewise, we must respect the customs, beliefs, and cultures prevailing in those countries.

If there are doubts about the application of laws or applicable behaviors in each culture, we should consult the Legal Department or, failing that, the Presidency to resolve any concerns in this regard.

We will require our suppliers and third parties to comply with the laws of the country, and we will define agreements with them that allow us to audit compliance with applicable laws, especially labor, environmental, tax, customs, and exchange laws; likewise, operations that may potentially involve money laundering and financing of terrorism (AMUFT) will be thoroughly reviewed, whether within the national or international legal framework.



# THE COMPANY AND ITS PEOPLE

## A. Respect for People:

Prohibition of any form of discrimination: All employees, without exception, must be treated with respect. The Company does not endorse or authorize behavior that involves discrimination or harassment of any kind and prohibits any form of retaliation against those who report events of discrimination or harassment, alleged or known.

Discrimination and/or harassment consist of providing differential treatment, which leads to an intimidating, unfair, hostile, or offensive work environment or interferes with the person's job performance, based on their race, gender, skin color, religion, nationality, age, sexual orientation, disability, or any other characteristic unrelated to their ability to perform the job.

Harassment can take various forms, including offensive comments, nonconsensual sexual advances, and other forms of verbal, graphic, or physical behavior that create an intimidating, hostile, or offensive work environment. Regarding the issue of workplace harassment, the Company complies with and supports the provisions of Law 1010 of 2006, corrected by Decree 231 of 2006 and

modified by Law 1622 of 2013, which regulates and protects workers from workplace harassment in Colombia, as well as the laws in other countries where it operates.



- Personal attitudes in the workplace: Relationships with colleagues should be focused on fulfilling the principles of respect, loyalty, and cooperation to create a healthy and pleasant work environment. With the Company: in performing their duties responsibly, with an attitude of identification with organizational parameters and intelligent execution to contribute to achieving the Company's objectives and goals.
- Workplace violence: The Organization does not permit or tolerate the use of violence, meaning any threat or violent act by any employee or contractor towards other individuals or against the Company's or third parties' property will be sanctioned.
- Prohibition of toxic substance use or consumption of alcoholic beverages: The Organization prohibits the use of alcohol and hallucinogenic substances at work, or outside of work when it affects or could affect the image, safety, or integrity of employees, their families, and the Organization's operations.

## B. Conflicts of Interest

- Conflicts of interest in commercial, financial, and personal relationships: All employees have a permanent obligation to act primarily and solely for the benefit of the Company. A "conflict of interest" arises when personal, social, financial, political, or commercial activities interfere with the employee's objectivity and/or loyalty to the Organization's interests.

Likewise, a conflict of interest may arise when the employee or their close relatives, that is, those within the fourth degree of consanguinity, second degree of affinity, or first degree of civil relationship, may economically or personally benefit from their actions.

Anyone in the selection process to join the Company must disclose any conflicts of interest. The Company requires its employees to disclose any actual or potential conflicts of interest to their immediate superior or to Human Resources, in order to take timely measures to prevent or mitigate the impact of the conflict, protecting both the employee and the Company.

## C. Undue Pressure or Lobbying

The Company often takes a specific position on public or private policies that may affect its business in any way. Likewise, it undertakes legal and legitimate efforts to influence legislation or governmental, national, or local policy.

However, the Company does not directly or indirectly make monetary contributions or provide other valuable assets to any person, entity, or political party for the purpose of obtaining or retaining a benefit or business.



## D. Resource Management

All tangible and intangible assets owned by the Organization and made available to employees are the property of the Company, and it is vital for employees to use and take care of them responsibly, promoting employee responsibility towards the Company.

- **Tangible Resources:** All employees must make proper use of resources and fixed assets. Actions such as theft, negligence, loss, damage, destruction, embezzlement, and misuse of these resources cause harm to our Organization. We will always use resources exclusively for the purposes for which they were provided. We will also use the computer resources made available to us responsibly, including our e-mail address, which should not put the image or reputation of our Company at risk. When incurring expenses for travel, representation meetings, or any events conducted on behalf of the Company, they must be done in a reasonable manner. The legalization of expenses must be timely, authorized, and supported.

- **Intellectual Property:** One of our most important assets is intellectual property, including registered trademarks, trade names, patents, copyrights, trade secrets, knowledge, expertise, inventions, developments, and technology. Therefore, we will only allow the use or sharing of intellectual property with individuals outside the Company if there is appropriate legal documentation, a license agreement, or equivalent document. Likewise, when obtaining information from other companies, we will refrain from infringing, obtaining, or fraudulently using patent rights, trademarks, or other intellectual property of other companies or third parties unrelated to our Organization without their consent.

- **Information Confidentiality:** It is important for the Company to protect and maintain as "confidential information" administrative, operational, logistical, market, financial, commercial, business, or other non-public information that employees become aware of due to their job functions. This information may relate to data about our employees, clients, suppliers, shareholders, consumers, inventions, or technical or technological innovations that have been created or improved in the Company and would cause harm to our Organization if disclosed to third parties, whether they are direct competitors or not.

Employees accept and understand that by legal mandate, any new technical or technological invention or improvement

of an existing one, even if created or improved by the employee, is the exclusive property of the Company.





When joining the Company, the employee maintains a legal obligation not to disclose or make use of confidential information from their previous employer. Similarly, the Company expects employees who end their employment relationship to refrain from disclosing "confidential information". Therefore, it is recommended to avoid situations in which this information could be accidentally revealed, such as reading or discussing it in public places or leaving it unsupervised and unprotected. The above contributes to protecting privacy and creating a trusted environment that encourages individuals and entities to continue providing personal information. The information on the Company's computers, such as files, price lists, cost systems, etc., is the property of the Organization and sharing it with individuals is prohibited. Employees are prohibited from engaging in fraudulent maneuvers or strategies with information in order to influence decision-making.

## E. WRAP Principles:

"Worldwide Responsible Accredited Production" or WRAP for short, means "Worldwide Responsible Accredited Production" and its principles are , the basic standards to ensure that those who work in companies participating in this program provide humane, fair, and responsible treatment to their workers.

The Organization adheres to, defends, and promotes the WRAP principles, and all employees must be aware of and comply with them:



1. Compliance with labor laws and regulations: We comply with legal laws and regulations in business and in our relationship with those who work here.
2. Prohibition of forced labor: We do not employ workers by force or involuntarily.
3. Prohibition of child labor: We do not hire individuals under 18 years of age.
4. Prohibition of harassment or sexual abuse: We provide a work environment free of harassment, sexual abuse, or corporal punishment.
5. Compensation and Benefits: We meet the legal requirements for salary and benefits and offer a competitive salary in the industry.
6. Working Hours: We comply with the legal limits in Colombia for days and hours worked per week and provide paid time off.
7. Non-Discrimination: We hire, pay, and terminate employees based on their ability to perform the job and not on personal characteristics or beliefs, religious or political.
8. Health and Safety: We provide a safe working environment that does not harm the health of employees.
9. Freedom of Association: We recognize and respect the rights of workers to associate.
10. Environment: We comply with environmental laws, regulations, and standards applicable to plant operations.
11. Compliance with Customs and Exchange Regulations: We comply with all customs, exchange laws, and maintain

practices to prevent the illegal shipment of products.

12. Security: We work together with customs authorities and anti-drug and anti-terrorism agencies to prevent the shipment of narcotics, explosives, toxins, and/or contraband.



## F. Transparency in Selection:

Employees or executives of the Company are prohibited from giving preferential treatment to suppliers or customers who are also shareholders, executives, employees, or close relatives of these individuals. Additionally, we must use the necessary transparency in the personnel selection processes, guaranteeing equal employment opportunities when recruiting, promoting, and supporting professional development.

## G. Employee Safety :

The Organization strives to provide a safe and healthy work environment for its employees, and it is our duty and responsibility to comply with all safety regulations. To ensure the safety of individuals on the premises, the Company may, upon any employment engagement, conduct investigations into the conduct of the applicant and request documents related to judicial, disciplinary, or any other type of background, in accordance with legitimate means protected by national legislation without the need for additional explanations. Likewise, if the Company becomes aware of or has reasonable suspicion of any irregular conduct within it, it may determine that tests such as the polygraph, home visits, or any other test that verifies such backgrounds be conducted. Additionally, the Company may request personal, family, or employment



references from individuals applying for a position in the Company. When dealing with suppliers, customers, and consumers, it is expected that our employees comply with all legally, ethically, and commercially accepted conduct standards and behave and conduct business in an appropriate manner, avoiding violations of supplier and customer codes of conduct or the relevant guidance provided to their employees.



## THE COMPANY AND ITS BUSINESS PARTNERS

### A. Suppliers and Business Allies:

The Company encourages free and fair competition among suppliers, through fair and equitable conditions, and a selection criterion based on the best offer in terms of price, payment terms, quality, and delivery times that each supplier offers. Under no circumstances should employees, shareholders, or their relatives be favored in the selection of a supplier. We will choose suppliers who share ethical values and have a solid reputation for fairness and integrity in their dealings. We will choose suppliers who are able to meet business needs in terms of quality, cost, timeliness, and innovation, always seeking to protect the interests of the Organization and maintaining relationships based on integrity and justice.

We provide each of our suppliers with the Code of Conduct for Suppliers and Contractors, with the conduct standards that we expect from each of them to establish business relationships.

## B. Customers and Consumers:

The Company treats all its customers fairly and justly. Therefore, it prohibits any treatment that favors one customer and harms the interests of another. The Company does not discriminate against its customers based on their size, type, channel, or business strategy. Therefore, employees must maintain a cheerful outlook of customer service, responding with attention and diligence to solve problems or receive criticism, acting with transparency according to the rules and procedures, efficiently resolving the matters entrusted to them.

## C. Appropriate Advertising and Promotion for Consumers:

The Company does not allow advertising or promotions of its products, of any kind, to be false or misleading, and it has a policy of always addressing and responding to respectful comments or criticisms about its advertising or promotional events. It also does not allow such advertising to undermine minimum moral, religious, ethical, or social values.



Likewise, the Company fully complies with the applicable regulations in Colombia related to the Consumer Statute, competition law, and the principles of freedom of enterprise.

## **D. Quote, Business, and Contract Management:**

Employees act with transparency, respect, efficiency, and honesty in the preparation and study of quotes, in business negotiations, and in negotiating the purchase of goods or services. All proposals, quotes, and negotiations are governed by the Organization's internal policies. The Company is an ethical, social, and economically responsible entity; therefore it does not allow or promote the creation of false operations, documents, or records, and requires that the information contained in its books and records be accurate, timely, and complete. Considering the above, employees must always perform their duties with the certainty that any activity contrary to these principles will not be endorsed or tolerated. To this end, the Company has internal controls that ensure accuracy, and it is the responsibility of each employee in their area.



## E. Money Laundering:

Our Organization prohibits participation in transactions that facilitate money laundering or result in illegal diversion of assets. To this end, we have implemented a self-control system and comprehensive risk management of money laundering and financing of terrorism (AMUCFT), which is in line with current regulations.

A fundamental part of our AMUCFT system consists of knowing all legal entities and individuals with whom we interact. For this reason, we verify their backgrounds based on public databases, inquiries in the industry, and even consult international lists such as the Special Designated Nationals and Blocked Persons list issued by the U.S. Department of the Treasury, also known as the "Clinton List, OFAC," which includes many individuals and legal entities linked to drug trafficking.



## THE COMPANY AND ITS COMPETITION

The Company does not engage in any agreement or arrangement with competitors with the aim of reducing fair and just competition in the market, participating in any form of "cartel" or conduct that may constitute restrictive practices of competition or unfair competition within the terms of Law 256 of 1996, Law 155 of 1959, and Decree 2153 of 1992. Therefore, it unilaterally and independently determines the prices and sales conditions for its products and services, without any association with our competitors. As such, it is prohibited for any employee to engage in fraudulent maneuvers or strategies that constitute unfair, illegal, or improper treatment with the competition. Likewise, in our Organization, boycott is prohibited, which is understood as the action of attacking a company or trader by not doing business with them and preventing them from doing business with other companies or limiting their activity, unless selling to a specific company is considered illegal, such as in the case of those listed in the "Clinton List" or those judged by criminal justice.





# THE COMPANY AND THE COMMUNITY



## A. Respect for the Environment:

Our company has always been characterized by its respect for the environment. Therefore, we will always meet or exceed legal requirements regarding environmental care and preservation. We will evaluate our environmental performance, work towards continuous improvement, and provide objective information about our operations. As employees, we must practice sustainable development and the conservation of our resources.

Additionally, the company has implemented controls to achieve cleaner and more environmentally friendly production. We have also undertaken practices to mitigate any environmental impacts that may occur in our production processes.

## B. Respect for the Community:

In our organization, we are committed to contributing to the strengthening of relationships with the community and creating favorable conditions that stimulate and reinforce the development of the communities surrounding our operations. We respect the culture, heritage, and customs of each neighboring community.



## C. Social Responsibility:

The company recognizes the importance of human beings and their development. As the business expands globally and takes on large-scale projects, there are greater demands in the social sphere. The organization is proud to demonstrate its social commitment through its business management, with the individual as the central element. We take significant actions in favor of the environment, support education, culture, and the communities in which our employees live and work.

## D. Political Participation:

We respect the right of each employee to belong to political parties, participate in political committees, and support candidates, creating an environment of freedom of expression as long as these activities do not interfere with the work environment, take place outside the company premises, and it is understood that the employee is not representing the organization.

## E. Government Entities:

We always respond to the requirements of government entities in a timely manner and in compliance with the law. Our approach will always be friendly and respectful, fostering an atmosphere of openness and trust that facilitates discussion, understanding, and the establishment of agreements. We refrain from offering, promising, or making director indirect payments, in cash or in other forms of value, to a person or public or political entity, or to the public employees working in them, in order to influence acts or decisions, receive preferential treatment or special personal gain, or to obtain or retain business.

## F. Against Corruption and Bribery:

Our company does not offer or give bribes to favor its interests to any person or public or private entity. Our commitment is zero tolerance for bribery, both for our employees and our business partners. We respect the legislation in the jurisdictions where we operate, and our relationships with government officials in these jurisdictions will always be conducted within legal frameworks.



## G. Gifts and Perks:

In our Organization, we do not accept any kind of "commercial bribery," which involves giving or receiving from clients, suppliers, or any entity or person, payments, gifts, or commissions, with the expectation or effect of obtaining more favorable business conditions or opportunities than those normally available to others under the same conditions. Gifts known as "institutional," such as agendas, office supplies, and commercial samples, are allowed as long as they do not coerce the recipient into initiating or maintaining a business relationship. Therefore, in order to avoid malicious practices, the Company allows offering and receiving gifts, the value of which does not exceed twenty-five percent (25% of the Current legal minimum monthly salary.

## H. Product Safety:

Our products comply with legislative requirements and applicable regulations regarding their safety and labeling, providing objective and appropriate information for proper use and understanding by the consumer.



## ETHICS LINE

Our Ethics Line, "About Us," is a channel that ensures the ethics and transparency of the individuals who are part of the Company, its suppliers, and those who have a relationship with the Company.

Through our contact channels, actions that violate the ethical principles established by the Organization can be reported. If you wish to report a case, you can contact **the hotline at 01-8000-180263 or send an e-mail to [asisomos@crystal.com.co](mailto:asisomos@crystal.com.co).**



# IMPLEMENTATION OF THE CODE OF CONDUCT

This Code of Conduct is meant to be put into practice, so we invite you to keep its principles in mind. In the event that behaviors or actions contrary to our Code are identified, the Organization may proceed to establish disciplinary measures, suspensions, dismissals with just cause, or civil lawsuits in order to continue promoting compliance with our Code.

It is mandatory that in the event that as employees we find ourselves in a situation in which we determine that we could violate it if we act, or when we become aware that another employee is acting against this Code, we are asked to bring it to the attention of one of the following areas: Presidency, Comptroller's Office, or Corporate Human Resources Management. These areas will be responsible for conducting the necessary procedure to verify the facts and apply the measures deemed relevant for each case, while maintaining the necessary confidentiality at all times. Obviously, all complaints submitted will be made in good faith and in a responsible, reasoned, and honest manner.



This Code of Labor Conduct is part of our employment contract and may be annexed to certain service contracts deemed relevant by the legal department. Therefore, the sanctions provided for in the internal regulations will be applied to violations, duties, and prohibitions contained in this Code.

**Lack of knowledge of the content of this Code does not exempt individuals from compliance, nor from any sanctions for non-compliance.**



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