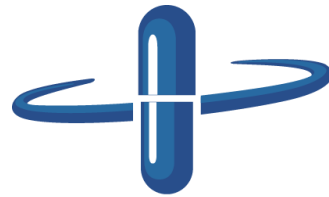


Code of Ethics and Business Conduct



FARMACAPSULAS®

Content

1. Presentation of the Legal Representative
2. Strategic Direction
3. Purpose and Scope
4. Definitions
5. General Guidelines
 - Guidelines on anticorruption (money laundering, terrorism financing) and national, transnational anti-bribery, and other corrupt practices.
 - Remuneration for Employees.
 - Gifts, entertainment, meals, travel, and accommodation.
 - Political contributions and donations.
 - Conflicts of interest.
 - Use of Company assets, information, and resources.
6. Relationships with Stakeholder Groups
 - Our Employees.
 - Our Business Associates (clients, suppliers, contractors).
 - Our Environment.
7. Data Protection
8. Administration of the Corporate Ethics Program

1. PRESENTATION OF THE LEGAL REPRESENTATIVE

The present Code of Ethics and Business Conduct of C.I. FARMACAPSULAS S.A.S outlines the general framework for the relationship between the Company and its employees with stakeholder groups, the actions, and decision-making necessary within the scope of the business, always acting under the values of total Honesty, Responsibility, Efficiency, Integrity, Transparency, Respect, Equity, Impartiality, and Promptness.

The practice of these values has been a fundamental pillar for the growth of our Company under a corporate culture of compliance with the law in which transnational bribery and corruption, in general, are considered unacceptable. All of this has allowed us to build a corporate image that supports our Mission and Vision, always striving for excellence in the quality of the products we offer to our customers for the well-being of the community.

This code of conduct seeks to provide transparency and integrity to the actions of senior executives and employees of the company at all levels. Therefore, this document establishes the obligations and responsibilities of all those involved with the organization, ensuring compliance with standards, policies, regulations, harmonious coexistence, organizational ethics, proper execution of internal and external controls that ensure compliance with national and international laws.

Everyone who is part of the company must adhere to this Code of Ethics and Business Conduct, with the firm purpose of ensuring that all business-related activities strictly adhere to laws and regulations, and that we uphold the standards and principles of responsibility we have with the company and our business environment.

We invite you to report any situation that goes against this Code to your immediate supervisor, the Compliance Officer, or through the email designated for this purpose. Do not hesitate to contact us through any of the aforementioned means.

Finally, I want to thank all FARMACAPSULAS employees for their ongoing commitment to the highest standards everywhere and every day, always acting under the Code of Ethics and Business Conduct. Thus, fulfilling what others expect from our company and what we expect from ourselves.

2. OUR STRATEGIC DIRECTION

Our Mission

We deliver to our customers hard capsules, pharmaceutical and natural products of high quality and reliability to satisfy their needs and expectations, through productive, optimized and technologically advanced operations, generating development and well-being in their human talent, the community and their shareholders.

Our Vision 2025

To be recognized by our customers and in the market as a globally outstanding company known for the optimal quality of its products, excellence in service, competitive prices, and responsiveness to the needs of its markets, ensuring the sustainable development of the company.

Our Corporate Competencies

- Willingness to Work as a Team and Respect for Standards
- Commitment to Quality and Performance Excellence
- Commitment to Service Excellence
- Risk Prevention Awareness

3. PURPOSE AND SCOPE

What are the purposes of this document?

- Provide a unified guide for the daily development of operations within the values of business ethics and what we aspire to see in practice as ethical behavior.
- To generate in FARMACAPSULAS' employees a commitment to efficient, integrated, and transparent management in their professional relationships, both internally and externally.
- Contribute to maintaining the corporate image of excellence and to the achievement of our strategic direction of the company.

To whom does this Code of Ethics and Business Conduct apply?

This Code applies to all FARMACAPSULAS employees, including all operations and activities related to the business.

The Code also establishes ethical standards for our interaction with business associates, as well as for contractors.

4. DEFINITIONS

Here are the meanings of the terms used in the Code of Ethics and Business Conduct:

- **Business Associates:** Refers to customers, contractors, and suppliers.
- **Employees:** Individuals who perform specific tasks in the company, contributing their knowledge, skills, attitudes, and results to the achievement of business objectives.
- **Conflict of Interest:** A situation in which a person is in a position where they could prioritize their private, personal, or family interests over corporate interests, with the aim of gaining a benefit for themselves, their family, or partners. In such a way that his private interest may interfere with the objectivity required by their position or affect their decision making. In other words, the person has a direct interest in the decision they must make, either because it affects them, their family, or partners.
- **Ethics:** For the purposes of this document, ethics means doing what is right, in the right way, for the right reasons; it encompasses behaviors, both personal and professional, in the conduct of business.
- **Compliance Officer:** Employee appointed by the Board of Directors, whose main duties include ensuring the communication of this Code, promoting an ethical culture, preparing reports on ethical matters, and fulfilling other functions defined by the Board of Directors, as well as complying with the duties established in the regulations.
- **Public Servant or Authority:** Refers to members of public entities, organizations, and corporations, and, in general, to all employees and workers of the Colombian State or other countries.
- **Transnational Bribery:** An act whereby a legal entity, through its employees, administrators, partners, contractors, or subordinate companies, directly or indirectly gives, offers, or promises to a foreign public servant: (i) sums of money, (ii) objects of pecuniary value, or (iii) any benefit or advantage in exchange for said public servant performing, omitting, or delaying any act related to their functions and in connection with an international business or transaction.

5. GENERAL GUIDELINES

FARMACAPSULAS and its executives are committed to acting with responsibility, efficiency, integrity, transparency, honesty, and respect. Likewise, they express their willingness to self-regulate and make decisions in accordance with the aforementioned values in this Code of Ethics, guiding themselves towards an integral management based on ethical values in relation to all their stakeholders.

This commitment extends to the management of the company's employees and business associates, who will act with objectivity, ethics, and professionalism in the exercise of their roles or provision of services or supply of goods, with each of them being responsible for their compliance.

The following are the guidelines as a framework to help identify the boundaries within which we must operate.

Guidelines on anti-corruption and national, transnational anti-bribery, and other corrupt practices.

- The work carried out by FARMACAPSULAS employees is always conducted with rectitude, professionalism, integrity, for the benefit of the company, and in accordance with corporate interests.
- All decisions are made based on obtained information, in an impartial and objective manner, not influenced by subjective considerations.
- Any situation in which direct or indirect private, personal, or family interests conflict with corporate interests or may interfere with the ethical and transparent performance of our functions is to be avoided.
- It is the obligation of everyone to report illegalities and irregularities.
- FARMACAPSULAS does not tolerate any form of bribery (influence peddling, payment of commissions to authorities, among others) or corruption; therefore, we demand that others do not engage in or attempt such actions with us.
- We do not accept engaging in commercial, foreign exchange, or foreign trade operations as a means to conceal, handle, invest, or benefit in any way from money or other assets derived from criminal activities to give an appearance of legality to transactions and funds associated with them.
- As employees of the Company, our relationships are governed by the framework established in the laws of each country and by the highest international standards on the prevention and fight against bribery and corruption.

Code: DAD-166 (Effective as of November 14, 2023)

Edition 4

Page 6 of 19

- Bribing or allowing bribery, corruption are dishonest practices, prohibited by the Company, and will result in disciplinary and punitive consequences.

Remuneration for Employees

The remuneration of our employees is determined according to the organizational structure of FARMACAPSULAS, defined by different occupational levels. In each level, the salary range is defined based on responsibilities, the business context, and the labor market, complying with regulations established in labor laws. Compensation will be reflected in employment contracts initially, preserving the purchasing power of the employee continuously, with reference to the current legal minimum wage in Colombia.

Gifts, entertainment, meals, travel, and accommodation.

Under no circumstances are employees, contractors, or consultants of the company allowed to give, offer, or promise directly or indirectly to national or foreign public officials money, objects of pecuniary value, or any benefit in exchange for said public official performing, omitting, or delaying any act related to their functions and in connection with a national or international business transaction.

The purpose of corporate gifts and attentions to individuals is to establish goodwill and strengthen relationships with business associates. They are not intended to gain unfair advantages for the company or personal benefit. Any corporate gift or attention must be consistent with reasonable customary business practices and, therefore, should not be in the form of cash or its equivalent.

Gifts cannot be given to authorities as a facade for bribes, undue favoritism, or other corrupt actions. Supports or gifts to charitable causes or social works sponsored by employees to authorities are considered permissible, as well as measured corporate attentions to authorities or entities, provided they are consistent, measured, and do not aim to gain any advantage or influence a decision inappropriately.

Gifts, entertainment, meals, travel, and accommodation for individuals must adhere to the following guidelines:

- As employees, we must be cautious not to give or receive gifts, entertainment, meals, travel, and accommodation that may appear excessive or capable of inappropriately influencing a decision or business relationship.

- Employees are not allowed to use their position in the Company to request any kind of personal favor, remuneration, commission payment, discount, travel, accommodation, gifts, or loans from business associates or stakeholder groups. These practices are prohibited.
- Any gift or accommodation received should only be motivated by expressing esteem, courtesy, or gratitude, and not for the purpose of gaining a particular interest. It should be of reasonable value, not ostentatious or extravagant, considering local customs, market practices, and the respective social status of the donor and the recipient. When an employee is unsure whether to accept a gift or attention, they should consult with their immediate supervisor and the Compliance Officer.
- FARMACAPSULAS employees should not receive income and/or benefits from business associates.

Political contributions and donations

All donations from FARMACAPSULAS will have a lawful purpose and will be primarily, though not exclusively, directed towards sectors such as education, health, environment, childhood nutrition, and non-profit entities or, in general, any organization that legitimately contributes to the social development of the country. These donations will be recorded in the company's accounting, accompanied by the appropriate certificate issued to the recipient organization.

Donations to philanthropic entities or Politically Exposed Persons (PEPs) as a facade for bribes, improper favoritism, or other corrupt actions are not allowed. We will refrain from making donations if circumstances could make them appear as a bribe or any other corrupt action, even if this is not our intention and we are aware that it is not true.

Conflict of Interest

A conflict of interest is presumed to exist when a candidate for a vacancy or an employee has a family relationship up to the fourth degree of consanguinity or third degree of affinity with a business associate of FARMACAPSULAS. This obligates the candidate for a vacancy or employee to promptly, fully, and truthfully declare their impediment in the relevant function or decision-making process, stating the family, moral, or economic circumstances that may affect their independence, impartiality, and transparency. The conflict of interest is not established solely by being in a personal or family situation that could impact the decision to be made but by not disclosing it, knowingly being in a situation of hindrance to participating in the decision or management in question.

Once the candidate for a vacancy or employee discloses the conflict of interest, the situation will be analyzed by the Human Resources Management and the Compliance Officer, who will assess and determine whether it is necessary to take measures to prevent or minimize any impact on the company.

Business associates must also disclose the existence of a conflict of interest that may affect the transparency of the hiring process or the execution of the service or supply of goods, in the terms mentioned above. Suppliers and contractors must disclose this circumstance to the Purchasing Manager, and customers to the Head of Exports, who, together with the Compliance Officer, will assess and determine whether it is necessary to take measures to prevent or minimize any impact on the company.

Use of Company assets, information, and resources.

Employees have the obligation to ensure the preservation of the company's assets and resources and their measured use only for the purposes for which they were entrusted.

All employees must be diligent in maintaining the integrity and confidentiality of the Company's private, restricted, and confidential information, which may not be published or shared with third parties. Business associates who have access to this information during their business relationship with the company may not use it for their own benefit or that of third parties and must keep it confidential. These obligations apply even after the relationship with FARMACAPSULAS has ended.

Document preservation will be carried out in accordance with the internal procedures applicable to each area.

Every employee or business associate is obligated to report theft, fraud, and other dishonest actions related to the company's assets, information, and resources when they become aware of them.

FARMACAPSULAS's electronic communication systems and physical assets are intended to facilitate business activities, so all communication between employees and external parties must be conducted professionally.

The use of the company's logos and trademarks is prohibited without explicit permission from the authorized person or position.

We respect intellectual property rights. The company commits to excluding any software or program that is not properly licensed. Employees and business associates are bound by the same commitment.

Examples of Company Private Information that we must keep confidential as FARMACAPSULAS employees.

- Intellectual property, such as patents, trademarks, copyrights, trade secrets, and industrial and business secrets.
- Designs, schematics, technical specifications, technical know-how.
- Financial matters, business models, production processes, security codes, customer and supplier lists, pricing allocation practices, marketing strategies.

6. RELATIONSHIPS WITH STAKEHOLDER GROUPS

Our Employees

Our employees are a fundamental pillar in the growth of our company. Therefore, during their onboarding, our company ensures that they adhere to behavioral guidelines that reinforce the outlined principles herein. Therefore:

- We encourage employees to report adverse events related to the safety of the production process, international supply chain, and company products.
- We foster a healthy and productive work environment, promoting collaboration and teamwork.
- Employees are expected to comply with hygiene, quality, safety standards, and Good Practices in the performance of their duties while maintaining personal ethics and a continuous awareness.
- We respect fundamental human rights and show absolute respect regardless of gender, race, religion, among other differentiating factors.
- We give high priority to complying with labor laws and regulations governing relationships with employees, and we do not hire minors.
- We do not tolerate any form of discrimination, whether verbal or through action, based on race, gender, religion, nationality, sexual orientation, among others.
- We do not sponsor criminal activities such as human trafficking.

- We provide safety to our employees and ensure that the facilities are suitable for work.
- We promote the corporate competencies that define us and behaviors encouraged in our Code of Ethics and Business Conduct.
- We set challenging objectives with an emphasis on results and in accordance with our skills.
- We provide equal employment opportunities for all employees and qualified candidates.
- We act fairly and respectfully in all aspects of hiring, promotions, and dismissals, as well as throughout the employment relationship.
- Harassment (workplace, sexual, or any other form of harassment), degrading treatment, forced labor including intimidation, is strictly prohibited and may result in disciplinary measures, including termination of employment.
- Violence of any kind in the workplace, including hostile physical contact, intimidation, or threats that make others feel unsafe, will not be tolerated.
- Employees are committed to reporting any political, commercial, financial, or other pressure that adversely affects the company, its environment, or the quality of their work.
- All employees must protect and not disclose information, documents, and any type of information from clients, suppliers, transfer of results, reports, or data in physical or electronic form, which is the property of the company, is confidential, and may not be disclosed to third parties.
- All employees must provide excellent service to the company's customers, always maintaining a framework of ethical relationships and compliance with internal norms, laws, and policies.
- All employees must fulfill the service agreements of their internal and external clients according to the commitments established on delivery terms, reliability, and quality in the development of their operations.
- We promote awareness for the protection and care of the environment through environmental plans and programs.

Prohibited Situations:

- Providing information to the competition about FARMACAPSULAS' business matters such as prices, costs, suppliers, customers, production capacities, production processes, and terms of sale conditions that could affect the company.
- Engaging in activities considered by the law as constituting unfair competition.
- Avoiding situations that could constitute or could lead to a conflict between personal, family, and economic interests and those of our company.
- Participating in any business or activity that directly or indirectly competes or interferes with the company.
- Taking advantage of our position or role in the company to obtain personal benefits, including for members of our family or third parties.
- Providing or promising gifts to national or international public officials in exchange for any other type of benefit.
- Cash transactions equal to or exceeding \$10,000 should not be accepted.
- Using the company's resources for tasks unrelated to its activity or for personal gain or that of third parties.
- Accepting, for oneself or third parties, donations in cash or in kind from suppliers, contractors, clients, or entities with which the company maintains relationships due to its activity, which leads to generating any kind of unauthorized commitment.
- Misusing privileged information to gain personal benefit or benefit third parties.

Our Business Associates

We strive to provide and acquire high-quality products and excellent services, maintaining a professional and integrity-based relationship with our business associates. To ensure a lasting mutually beneficial relationship, we focus on conducting our negotiations transparently.

- We identify, know, evaluate, and record our business associates according to our internal procedures.
- We select and negotiate with business associates without any biases or preferences but based on objective analysis.
- FARMACAPSULAS applies due diligence measures to understand its business associates, their operations, products, and transaction volumes, in order to verify legal, financial, reputational aspects, relationships with third parties, among others.
- The Company ensures impartiality and transparency in procurement processes, within a framework of free competition, guided by the principles of good faith, justice, and equality.
- The purchase of goods and services is carried out by applying established Due Diligence measures according to our standards, policies, procedures, and applicable legislation.
- We preserve and promote fair and honest competition in the market, respecting our competitors and their products.
- FARMACAPSULAS competes fairly against others in innovation, efficiency, quality, service, performance, and price.
- We do not engage in agreements with competitors regarding the allocation of customers, territories, or market shares, and, in general, we do not engage in any acts considered unfair competition.
- No form of improper influence by business associates towards FARMACAPSULAS employees will be tolerated, such as bribery, gifts as per this Code of Ethics, alteration or concealment of associate information and documents to obtain a particular benefit, generation of reports based on false or inaccurate information, deliberate conduct in procurement processes and tenders to obtain gifts or engage in any activity to commit crimes of corruption, fraud, embezzlement, or bribery.
- We create and maintain an atmosphere of trust and mutual benefit with business associates.
- We fulfill our commitments, respect agreements, and negotiated contractual terms with our business associates.

- Our practices are honest, and we take care not to violate our Code of Ethics and Business Conduct, as well as our policies and procedures.
- Business associates are treated fairly in accordance with competition, antitrust, and fair-trade laws.
- Trade policy and prices are set independently and are never agreed upon, formally or informally, with competitors.
- We encourage our business associates to operate within the framework of pharmaceutical industry laws and regulations.
- We use products and services subject to compliance with standards and good practices in manufacturing, marketing, and distribution.

Our Environment and Governance

- We maintain constant collaboration with authorities and a strong commitment to preventing, detecting, and controlling national or international bribery and corruption.
- We provide accurate, complete, timely, and transparent information in the reports and documents we submit to authorities.
- We respect all applicable international trade laws when exporting products that are part of our business line.

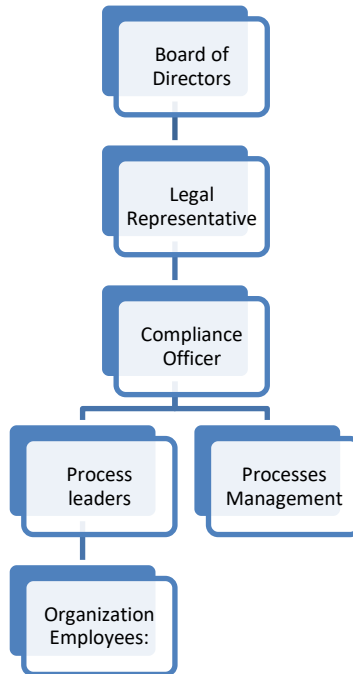
7. DATA PROTECTION

Given that FARMACAPSULAS may collect personal information from various individuals, including employees and business associates, we declare that this information is only processed for the purposes described in our Personal Data Processing Policy, which is available for consultation on the corporate website www.farmacapsulas.com.

FARMACAPSULAS complies with obtaining written consent before collecting or processing personal information.

8. ADMINISTRATION OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

The Transparency and Business Ethics Program aims to ensure that all employees and business associates are aware of and apply the ethical guidelines outlined in this code in their actions and activities, following the organizational structure below:



Board of Directors Responsibilities:

- Approve this Code of Ethics and Business Conduct.
- Approve the appointment of the compliance officer.
- Receive Reports on the Business Ethics and Transparency Program.

Legal Representative Responsibilities:

- Design, implement, and maintain the Business Ethics and Transparency Program.
- Enforce this Code.
- Provide the technological, human, and physical resources necessary for program implementation.
- Address the requirements of the Colombian Superintendencia de Sociedades, shareholders, and the Board of Directors regarding transnational or national bribery and corruption matters.
- Propose the Compliance Officer to the Board of Directors.
- Report to the Board of Directors on the business ethics program.

The Compliance Officer of the Transparency and Business Ethics Program will be the person designated by the organization and will assume the following responsibilities:

- Implementation of compliance policies.
- Provide reports to the Legal Representative on the Transparency and Business Ethics Program.

- Manage the risks of national and transnational bribery, and other corrupt practices to which the company is exposed.
- Address inquiries presented to them.
- Resolve declared cases of conflicts of interest.
- Propose updates and modifications to the company's procedures that help minimize the risks of transnational bribery and corruption.
- Report to authorities when there are indications of criminal activity.
- Propose updates and modifications to this Code.
- Any other responsibilities determined by applicable laws and regulations.

Processes Management:

- Provide support to the Compliance Officer.
- Design specific and appropriate procedures to manage the risk of national and transnational bribery and corruption.
- Evaluate compliance with this Code in internal audits.
- Propose mechanisms to the Compliance Officer for the identification, measurement, control, and monitoring of the risk of national and transnational bribery and corruption.
- Assist the Compliance Officer in designing, implementing, and/or coordinating training plans.
- Support the Compliance Officer in preparing reports related to the management of the risk of national and transnational bribery and corruption.
- Evaluation of risks and controls in risk matrices.

Process Leaders:

- Identify the management measures required for the effective management of the risks under their responsibility.
- Monitor the effectiveness of controls and the proper development of treatment plans.
- Approve the treatment plans proposed by them.
- Ensure that employees report warning signs promptly.

Organization Employees:

- Comply with the guidelines established in this Code.
- Report warning signs arising from daily activities.

Elements of the Program

This program, under the guidance of the Compliance Officer, consists of the following key elements:

Risk Assessment

The risk assessment will be conducted according to the internal procedure and risk matrix established by the company.

Training

Training sessions and educational material on the compliance expectations and ethical behavior of employees and the company.

Anonymous and Non-retaliatory Communication

FARMACAPSULAS has formal and informal communication tools and channels for employees and business associates to report suspicions of code of ethics violations or communicate issues or inappropriate behaviors that may adversely affect the company and/or product quality. Communication can be done anonymously and without retaliation.

Supervision and Audit

Procedures to assess compliance with the Code and applicable laws, as well as to identify improvement opportunities through internal audits.

Investigation and Enforcement

Taking appropriate measures to address misconduct or non-compliance by our employees and business associates, with the duty of cooperation in internal investigations. Lack of cooperation may result in disciplinary actions, including dismissal.

FARMACAPSULAS invites all its employees to report suspicions of code of ethics violations, which will be handled with complete confidentiality.

The information provided regarding reported cases will receive a prompt, professional, and confidential response. To this end, communication channels have been established where they can report any commercial, political, financial, or other pressure adversely affecting the company and the quality of their work.

Inquiries to the Compliance Officer

Any collaborator or business associate may submit inquiries to the Compliance Officer, and it is mandatory for the officer to provide a response. For this purpose, we have the following email address: etica@farmacapsulas.com.

The Compliance Officer will keep a record of inquiries.

Code: DAD-166 (Effective as of November 14, 2023)

Edition 4

Page 17 of 19

What happens if someone violates this Code of Conduct?

Violation of this Code by our employees will be sanctioned according to disciplinary procedures and other applicable regulations. Such non-compliance must be reported to the Human Resources Management for the corresponding disciplinary investigation.

Non-compliance with this Code by suppliers and contractors must be reported to the Purchasing Manager, and in the case of customers, to the Head of Exports, for the respective investigation. If the non-compliance is proven, FARMACAPSULAS will have the authority to unilaterally terminate the business relationship with the business associate and may impose fines on the offender in proportion to the magnitude of the non-compliance. In no case will the unilateral termination for non-compliance with this Code generate payment of compensation in favor of the business associate.

All cases of non-compliance with the code of ethics will be evaluated by the Compliance Officer, who will review all facts, data, and situations to determine their recommendations to the company. In the event of indications of criminal conduct, such instances must be reported to the Colombian Fiscalía General de la Nación (Attorney General).

Declaration of Acceptance

A record will be kept of all employees who confirm that they have been provided with the Code of Ethics and Business Conduct, and that they have read and understood it.

MY COMMITMENT STATEMENT

I declare that I have read and clearly understand the information contained in the Code of Ethics and Business Conduct of FARMACAPSULAS.

I will uphold these ethical principles and guidelines in all my daily work activities.

Employee's Name (please write clearly in block letters)

Area/Department:

Collaborator's signature: _____

Date (YYYY-MM-DD): _____

(Complete the information, remove this page, and return it to Human Resources)

CODE OF ETHICS AND BUSINESS CONDUCT OF FARMACAPSULAS

This code can be found in electronic format at External Site:
<http://www.FARMACAPSULAS.com>