



## Code of Ethics Global Pharma & Logistic S.A.S.

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### 1. Purpose

Considering the importance of strengthening individual values and ethical principles as pillars for the development and improvement of our company, Management has prepared and disseminated this code, aimed at facilitating decision-making, especially in cases where conflicts of interest arise.

### 2. Scope

**2.1** This Code of Ethics is designed for compliance by the Directors of GLOBAL PHARMA & LOGISTIC S.A.S. company.

**2.2** It describes general situations regarding our relationships with customers, suppliers, authorities, and the community, taking into consideration those situations where there is a higher risk of a potential ethical conflict.

**2.3** New topics arising from the dynamics of business situations and the general environment will be incorporated into this code as needed.

**2.4** This document is not intended to be exhaustive or to cover all situations where an ethical conflict might arise. Therefore, situations not covered in this Code of Ethics will be resolved according to a sound management criterion.

### 3. Definitions

- **Associates:** Individuals referred to as partners or shareholders, meaning those who hold ownership of social quotas, interests, or shares in a commercial company.
- **Self-control:** The willingness of entrepreneurs and administrators to detect, control, and efficiently and effectively manage the risks to which the company is exposed.
- **Authorization:** Prior, express, and informed consent of the Data Subject to carry out the processing of personal data.
- **Database:** An organized set of personal data that is the subject of processing.



- **Distribution channels:** Means used by the company to offer and market its goods and services, such as retail establishments, door-to-door sales, or by telephone.
- **Conduct:** A person's way of behaving in a specific situation or in general.
- **Consequence:** The result of an event expressed qualitatively or quantitatively, whether it is a loss, harm, disadvantage, or gain. There could be a range of possible outcomes associated with an event.
- **Counterparties:** Natural or legal persons with whom the company has business, contractual, or legal ties of any kind; i.e., partners, employees, customers, and providers of goods and services.
- **Smuggling:** The entry of goods into Colombian territory, or their exit from it, through unauthorized places, or their concealment, disguise, or removal from customs inspection and control.
- **Discrimination:** Differential and detrimental treatment given to a person based on race, sex, political beliefs, religion, etc.
- **Ethics:** Ethics is the discipline that deals with the value of good, its nature, its relationship with other values, and the foundation of the moral rules that govern our actions.
- **Terrorist financing:** Financing of terrorism and organized crime groups and the management of resources related to terrorist activities and organized crime. It corresponds to the behaviors described in Article 345 of the Penal Code, amended by Article 16 of Law 1121 of 2006.

*"Article 345. Management of resources related to terrorist activities. Anyone who directly or indirectly provides, collects, delivers, receives, administers, contributes, safeguards, or holds funds, goods, or resources, or performs any other act that promotes, organizes, supports, maintains, finances, or economically sustains illegal armed groups or their members, national or foreign terrorist groups, or terrorist activities, shall be subject to imprisonment for thirteen (13) to twenty-two (22) years and a fine of one thousand three hundred (1,300) to fifteen thousand (15,000) current legal minimum monthly wages."*

- **Integrity:** Integrity is to act correctly. An integral person is someone who acts in accordance with principles and values.
- **Jurisdiction:** Geographical areas identified as exposed to AML/CTF where the entrepreneur offers or purchases their products.
- **AML/CTF:** An acronym used to refer to money laundering and the financing of terrorism.



- **Money Laundering:** Corresponds to the behaviors contemplated in Article 323 of the Penal Code, added by Article 8 of Law 747 of 2002, and modified by Article 16 of Law 1121 of 2006.

*"Article 323. Money Laundering. Anyone who acquires, safeguards, invests, transports, transforms, guards, or administers assets that have their immediate or direct origin in activities such as migrant trafficking, human trafficking, extortion, illicit enrichment, extortion kidnapping, rebellion, arms trafficking, financing of terrorism, toxic drugs trafficking, narcotics, or psychotropic substances, crimes against the financial system, crimes against public administration, or linked to the product of crimes executed under conspiracy to commit a crime, or who gives them the appearance of legality or legalizes, hides, or conceals the true nature, origin, location, destination, movement, or rights over such assets, or performs any other act to hide or cover up their illicit origin, will incur imprisonment for a single conduct, from eight (8) to twenty-two (22) years and a fine from six hundred fifty (650) to fifty thousand (50,000) current legal minimum monthly wages."*

- **Attempted Transactions:** These are configured when there is knowledge of a natural or legal person's intention to carry out a suspicious transaction but it is not completed because the person attempting it abandons it or because the established or final controls do not allow it to be carried out. These transactions must be reported exclusively to the UIAF.

- **Unusual Transactions:** These are transactions whose quantity or characteristics do not relate to the economic activity of customers or, due to their amount, the quantities traded, or their particular characteristics, fall outside the established norms.

- **Suspicious Transactions:** These are transactions that, due to their number, quantity, or characteristics, do not fall within the normal systems and practices of business in a particular industry or sector, and that, according to the customs and practices of the activity in question, cannot be reasonably justified. These transactions must be reported exclusively to the UIAF.

- **Perquisites:** Advantages or benefits received arbitrarily by a person.



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- **Psychoactive Substance:** Substances of natural or synthetic origin that, when consumed through any means (oral, nasal, intramuscular, intravenous), have the capacity to directly affect the central nervous system, causing specific changes in its functions.

- **Transfer:** Data transfer takes place when the data controller and/or data processor, located in Colombia, sends information or personal data to a recipient, who in turn is responsible for processing and may be located inside or outside the country.

- **Transmission:** The processing of personal data that involves the communication of such data within or outside the territory of the Republic of Colombia when its purpose is to carry out processing on behalf of the controller.

- **Values:** Deep convictions of human beings that determine their way of being and guide their conduct.

- **Violence:** Acts that involve the use of verbal or physical force against another person, animal, or object, resulting in harm to that person or object, either voluntarily or accidentally.

#### 4. Ethical Vision of Our Company

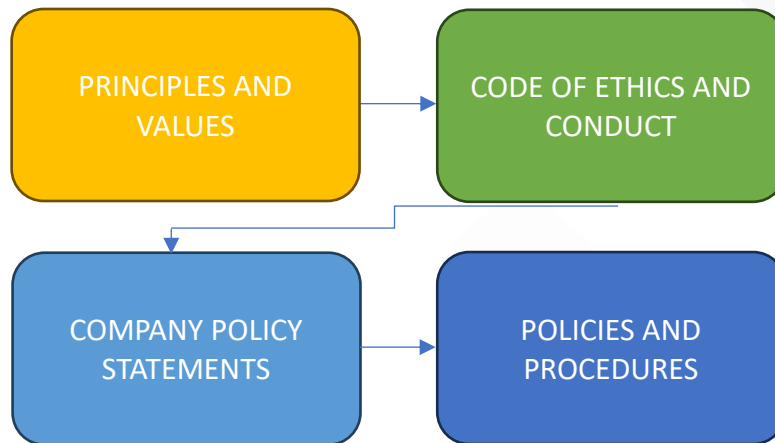
Ethics is related to the human quality of individuals and their actions. Speaking of the human quality of people who work in a company is speaking of respect for others and qualities such as Joy, Commitment, Excellence, Generosity, Honesty, Loyalty, Service, and Solidarity.

The ethics of human behavior has an impact on generating trust, and this, in turn, affects our reputation, placing us in a competitive advantage position compared to other organizations.

Therefore, starting not only from the trust placed by the organization in each of its collaborators but also from the awareness of the consequences of each of our actions and decisions, we are certain that these guidelines will contribute to personal and professional development, assisting in the construction of ethical behaviors in all areas of our lives.



#### 4.1 Hierarchy of Company Ethical Principles



#### 4.2 Principles and Values

- **Joy:** Working with passion.
- **Commitment:** I contribute and belong to a team of excellence.
- **Excellence:** We do things well, simply, and on time.
- **Generosity:** I add value and multiply knowledge.
- **Honesty:** I am a reliable worker.
- **Loyalty:** GLOBAL PHARMA & LOGISTIC S.A.S. believes in me, and I believe in GLOBAL PHARMA & LOGISTIC S.A.S.
- **Service:** My commitment to the customer is total.
- **Solidarity:** The sum of good work multiplies good results.

#### 5. Responsibilities

It is the commitment of all GLOBAL PHARMA & LOGISTIC S.A.S. employees to comply with the actions described in this document.

It is the responsibility of Management and Directors to ensure the control and compliance with the actions described in this document.

#### 6. Our Legal Environment



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## 6.1 Compliance with the Law

Employees must comply with the law according to what is established by:

- Prevention of Money Laundering and Terrorism Financing.
- General compliance with legal requirements.
- Transparency in our financial records.
- Internal Control.
- Avoiding corruption and bribery.
- Compliance with the Internal Work Regulations.
- Laws and regulations inherent to the company's Management Systems.

### 6.1.1 Reporting of Misconduct

Employees have the following means to report misconduct:

- Mailbox.
- Compliance Committee.

### 6.1.2 Responsibility for the Reputation of GLOBAL PHARMA & LOGISTIC S.A.S.

Each of the company's collaborators has the responsibility not to betray the trust placed in them, being aware of the consequences of our actions. Human behavior ethics have an impact on generating trust, and this, in turn, affects our reputation, placing us in a competitive advantage position compared to other organizations.

### 6.1.3 Money Laundering and Terrorism Financing

In accordance with the applicable regulations concerning the Risk of Money Laundering and Terrorism Financing, especially Circular 170 of 2002 issued by the Department of Customs and National Taxes (DIAN) and Circular 100 - 00005 of 2014 issued by the Superintendency of Companies, the company has adopted the behavioral norms mentioned below to prevent the company from being used for money laundering and/or terrorism financing.

#### 6.1.3.1 General Considerations





1. GLOBAL PHARMA & LOGISTIC S.A.S. has established that all its actions must adhere to ethics and comply precisely with current legislation. Its associates, as well as all its collaborators, have adhered to this institutional principle.
2. The company will not sponsor or engage in money laundering operations or financing of criminal activities, nor will it allow its associates and collaborators to engage in or permit these practices.
3. In particular, GLOBAL PHARMA & LOGISTIC S.A.S. takes measures to prevent that its operations can be used directly or indirectly as an instrument for the concealment, handling, investment, or utilization of assets of illicit origin or for the financing of criminal activities.

#### **6.1.3.2 General Purposes**

GLOBAL PHARMA & LOGISTIC S.A.S. has developed policies and procedures to limit the possibility of loss or damage resulting from its possible direct use or through its operations as an instrument for money laundering or for channeling resources towards criminal activities.

The company, its associates, legal representatives, and other collaborators, through adherence to this code, reaffirm their commitment to undertake all their actions with the utmost diligence to prevent the products or services they offer from being used for money laundering or terrorism financing operations, not only to protect the image of the entity but also to contribute to the fulfillment of the Colombian State's goals in compliance with the law.

These ethical provisions must be taken into account in each contract or operation carried out by the company. Their purpose is to serve as a guide in its actions in the face of all circumstances for the prevention of criminal activities, even if they have not been expressly anticipated in the Manual.

#### **6.1.3.3. Applicability Criteria**

1. GLOBAL PHARMA & LOGISTIC S.A.S., its associates, and other collaborators must prioritize compliance with ethical principles and provisions regarding the prevention and control of money laundering and terrorism financing over achieving commercial goals. In the authorization, execution, and review of all company operations, all collaborators will rigorously apply the rules for the management and self-control of ML/FT risk as set out in the SARLAFT manual and developed in various manuals that complement the management and control of the system.



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2. In the event of a conflict of interest, the rules for the management of money laundering and terrorism financing risk will prevail over the economic benefit derived from any type of operation.

3. The duties of preventing and detecting money laundering and terrorism financing cover all products and services of GLOBAL PHARMA & LOGISTIC S.A.S.

4. Before introducing a new product or service to the market, or prior to the opening of new distribution channels or stores in new jurisdictions, GLOBAL PHARMA & LOGISTIC S.A.S. will define the necessary controls to prevent and detect money laundering and terrorism financing activities.

As per these provisions and all the others contained in the SARLAFT Manual, GLOBAL PHARMA & LOGISTIC S.A.S. collaborators are required to:

- Refrain from participating in the execution and development of any type of illegal activity.
- Abstain from engaging in negotiations with individuals or entities involved in criminal activities.
- Clearly and promptly report any transaction or activity that contributes to the use of GLOBAL PHARMA & LOGISTIC S.A.S. by a third party or a collaborator for money laundering or the financing of illicit activities.
- Comply with the policies and procedures established in the SARLAFT manual.
- Utilize all necessary resources to achieve proper identification and understanding of the counterpart.
- Understand and apply the procedures aimed at preventing and controlling money laundering and terrorism financing to not only comply with the law but also to protect the image of GLOBAL PHARMA & LOGISTIC S.A.S.
- Take actions considered necessary to clarify the reasonableness and consistency of operations, identifying unusual operations clearly, determining the warning signs that may arise, and operations that can, based on their judgment and knowledge, be reported as suspicious.
- Take responsibility for the controls and prevention of money laundering and terrorism financing, considering that the person who carries out the operation is just as responsible as the one who reviews and approves it.

## 6.2 Information Management



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### **6.2.1 Records and Information Integrity**

It is of great importance for all companies to maintain proper records and control of all their resources and financial transactions. The information must be transparent, clear, accurate, and timely so that it can be used without limitations and with reliability for reporting to government entities and for the use of company management and oversight bodies. The objective is to make informed decisions about the company's resources, including investments, purchases, sales, and requests for credits, among other things.

Additionally, GLOBAL PHARMA & LOGISTIC S.A.S. adheres to established control processes to ensure transparency, accuracy, and proper recording in compliance with the company's general principles.

### **6.2.2 Confidentiality**

Company information is confidential and must be managed under this principle. This information is highly sensitive, as its disclosure can directly affect commercial and administrative strategies or the security of the company itself. Therefore, all employees of GLOBAL PHARMA & LOGISTIC S.A.S. are obligated to safeguard information generated from their own activities and refrain from using it for personal gain or on behalf of third parties. Reproduction and/or full or partial publication of this information should be avoided unless there is a legal obligation to disclose certain information.

Additionally, employees are advised to exercise special caution in the custody and proper supervision of such information. They should also be prudent in their verbal and written communications and avoid situations where they might inadvertently reveal information. It should be noted that even after leaving the company, employees are still obligated not to disclose or share such information.

### **6.2.3 Protection of Customer, Supplier, and Employee Data Security**

Given the emergence of new cybersecurity threats and the handling and protection of personal and corporate information, we seek to implement mechanisms to ensure the security, responsible management, consultation, updating, and correction of data.



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Therefore, GLOBAL PHARMA & LOGISTIC S.A.S. complies with this principle in accordance with legal requirements (Statutory Law 1581 of October 17, 2012) and applicable regulations in the countries where the company operates. This fosters an environment of trust for all our employees and promotes a culture of information security in an increasingly technology-immersed and dynamic world. We must exercise caution and responsibility to prevent fraud, theft, and improper handling of this type of information.

### **6.3 Behavior within the Legal Framework**

GLOBAL PHARMA & LOGISTIC S.A.S. is committed to always complying with and acting in accordance with current legal standards. We will promote respect for and interest in adopting ethical behavior based on principles of transparency and legality, not only for the benefit of GLOBAL PHARMA & LOGISTIC S.A.S. but also for the greater society.

All personnel associated with GLOBAL PHARMA & LOGISTIC S.A.S. must adhere to compliance with all applicable legal requirements as appropriate to the country in which they operate. It is worth noting that failure to comply with these laws or the rules contained in this code will subject individuals to appropriate disciplinary sanctions for failing to fulfill their obligations as employees.

#### **6.3.1 Mandatory Nature**

This Code of Conduct is adopted by GLOBAL PHARMA & LOGISTIC S.A.S. as a regulation, making it mandatory for all its employees to comply with. In this sense, the violation of the rules contained in the Code of Conduct is considered a serious offense and constitutes just cause for terminating the employment contract, in accordance with the law.

#### **6.3.2 Effectiveness and Repeal**

This Code of Conduct comes into effect from the date of approval by the Board of Partners, whereby it is adopted and repeals any provisions that are contrary to it.

## **7. Our People**

### **7.1 Our Code of Conduct**



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It is our obligation as members of the GLOBAL PHARMA & LOGISTIC S.A.S. organization to adhere to and strictly comply with the principles and values established within it. Through these principles and values, we aim to establish order, integrity, and respect for our environment, radiating transparency in all our actions to achieve the company's goals and objectives.

## 7.2 Training and Knowledge of Tasks and Responsibilities

Considering that in every company, human talent is the most important asset, GLOBAL PHARMA & LOGISTIC S.A.S. will sponsor and facilitate the continuous training of all its employees for the better performance of their roles. For this purpose, employees must:

- Fully attend the training courses or programs designed by GLOBAL PHARMA & LOGISTIC S.A.S. and sign the necessary records or certificates.
- Make the most of all types of training provided by GLOBAL PHARMA & LOGISTIC S.A.S., making the best use of it and subjecting themselves to verification and approval tests.
- Familiarize themselves with the regulations governing their profession or trade, study and use manuals and procedures for the proper performance of their duties.
- Be responsible for reading and applying communications issued by GLOBAL PHARMA & LOGISTIC S.A.S. and the organizations that regulate it.
- Thoroughly understand their tasks and functions in order to fully comply with the assigned responsibilities, perform well in their jobs, and provide better customer service.

## 7.3 Behavior in the Workplace

In line with organizational principles, all our employees, without exception, must be treated with respect. To this end, the following general guidelines have been established:

- The work environment is fair and equitable.
- Carrying and consuming alcohol and hallucinogenic and/or narcotic substances in the workplace and in any space representing GLOBAL PHARMA & LOGISTIC S.A.S. is strictly prohibited.
- Harassment and discrimination are strictly prohibited at GLOBAL PHARMA & LOGISTIC S.A.S. The company does not endorse, allow, or accept such behaviors.
- GLOBAL PHARMA & LOGISTIC S.A.S. respects individual differences and cultural diversity.



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- Romantic relationships between coworkers, subordinates, supervisors, and between employees of the company and suppliers are not accepted.
- Relatives up to the fourth degree of consanguinity, second degree of affinity, and first-degree civil relationships will not be hired at GLOBAL PHARMA & LOGISTIC S.A.S., except with prior authorization from the Compliance Committee.
- We support the participation of our employees in decision-making to improve our processes.
- The entry and possession of weapons within the company's facilities are strictly prohibited, except for personnel expressly authorized.

#### **7.4 Asset Management**

All employees, directors, and contractors must protect GLOBAL PHARMA & LOGISTIC S.A.S.'s assets and use them efficiently and correctly. Losses/theft, negligence, and waste have a direct impact on our profitability. GLOBAL PHARMA & LOGISTIC S.A.S.'s assets should only be used for legitimate business and work-related purposes.

#### **7.5 Handling of Insider Information**

Insider information is considered any non-public information related to GLOBAL PHARMA & LOGISTIC S.A.S. that, if made public, would have a significant effect on the market or prices in comparison to the competition. It would also exist if a reasonable investor would take this information into account when making an investment decision.

Insider information can be acquired as a result of an employee's role and responsibilities or involuntarily and includes information related to:

- Financial results
- Financial plans or budgets
- Major mergers or acquisitions
- Award of contracts or particularly important strategic plans
- Technical or product developments
- Business relationships with customers and suppliers

Anyone following the organizational guidelines who has access to insider information, such as business results or other non-public material information, may not, under any circumstances,





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dispose of it or disclose it without express authorization to do so, granted by the person authorized for these purposes.

The release of insider information is prohibited when it is done outside the regular course of work or professional duties or in the performance of other obligations. This applies to both information made public within GLOBAL PHARMA & LOGISTIC S.A.S. and information published outside GLOBAL PHARMA & LOGISTIC S.A.S., including to journalists, financial analysts, customers, suppliers, consultants, family members, or friends. Additionally, employees must always ensure that media containing insider information are properly safeguarded to prevent access by unauthorized individuals.

In some cases, supervisors may be personally held responsible for damages if an employee violates insider information rules and if the violation could have been prevented through adequate supervision.

Where applicable, additional or specific local laws and regulations regarding insider information must be complied with.

## **7.6 Leadership, Responsibility, and Supervision**

The culture of integrity and compliance in a company begins with its leadership. Directors must fulfill their responsibility for guidance and supervision, and as a result, they are responsible for all their employees.

Directors must exhibit appropriate behavior, exemplary performance, and social competence, such that clear, ambitious, and realistic objectives are achieved, leading by example with ethical and integral conduct.

They must assign tasks to each of their employees without limiting their freedom of action but always emphasizing the mandatory fulfillment of all assigned tasks in all circumstances, following company policies and legal guidelines.

Directors have the following basic functions:



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- They must carefully select their employees based on their personal and professional qualifications and suitability.
- They must provide clear and precise instructions to employees, especially concerning compliance with the company's internal policies and the consequences of non-compliance.
- They must clearly communicate to employees the importance of integrity and compliance in daily activities.

### **7.7 Use of Authorities and Powers**

The use of authority granted or delegated must be exercised while maintaining the company's policies, with each level responsible for executing orders given to immediate subordinates. To this end, the following will be considered:

- When functions involving the exercise of authority are granted or delegated to employees who hold certain positions, such delegation shall be made in consideration of the trust provided by their sound and equitable judgment. For this reason, it is absolutely forbidden the misuse or abuse of authority for personal benefit, third parties or to the detriment of GLOBAL PHARMA & LOGISTIC S.A.S. or third parties.
- All collaborators have a high degree of responsibility not only in what is committed with their signature when authorizing or certifying a certain situation, but also in everything that is presented or recommended to a higher body for approval or ratification.
- All employees shall comply with the procedures outlined by the Company and strictly adhere to the policies and requirements when requesting or authorizing services.
- The employees in charge of administrative control procedures shall verify compliance with the principles that govern the activity of the company and its employees, with the ethical standards and foundations, and to this end, shall take the measures to be applied in each case and shall proceed to their execution.

### **7.8 Proper Use of Resources**





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GLOBAL PHARMA & LOGISTIC S.A.S. provides its employees with all necessary resources to perform their assigned duties, and these resources should not be used for purposes other than those previously indicated. This takes into account the implications and impact that such uses may have on other employees.

Employees are responsible for controlling and properly using the company's resources, with the following established:

- All employees of GLOBAL PHARMA & LOGISTIC S.A.S. are responsible for controlling and properly using the company's assets, including physical and electronic information.
- Elements assigned to other employees or areas cannot be taken without the respective consent.
- Adequate management of time and use of assigned work equipment must be ensured.
- Adequate use of technological resources should be encouraged to make daily activities more efficient.
- Employees authorized to approve expenses are responsible for verifying the reasonableness of such expenses and ensuring that reports are timely, reliable, and properly supported with the corresponding documentation.

## 7.9 Interference with an Audit

It is the responsibility of all employees to provide truthful, complete and timely information to the control entities empowered for such purposes within the company and/or by law, in accordance with which the following guidelines are established:

- It is serious misconduct to attempt to persuade an auditor or whoever is acting in his or her stead to alter the results of an audit.
- It is considered serious misconduct to make false or inaccurate statements or to take steps to influence, coerce, manipulate or fraudulently mislead the control areas of GLOBAL PHARMA & LOGISTIC S.A.S.
- It is also considered serious misconduct for the auditor to facilitate, insinuate or agree to modify or lie about a result obtained in an audit.
- The company's employees must perform the functions assigned to them without deviating from the legal mandates and ethical principles, respecting and fully complying



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with the rules contained in the procedure manuals established in GLOBAL PHARMA & LOGISTIC S.A.S.

- Employees must inform their superiors or control bodies about irregular activities or possible unlawful conduct being incurred by employees or persons related to the company for the purpose of taking immediate action as appropriate.
- The auditor must present and maintain mental independence of judgment under the principles of integrity and objectivity.

## **7.10 Unacceptable actions within the company**

### **7.10.1 Abuse of intoxicating substances**

- In GLOBAL PHARMA & LOGISTIC S.A.S. it is forbidden to carry hallucinogenic, psychoactive or enervating substances while on the premises or during work.
- In GLOBAL PHARMA & LOGISTIC S.A.S. it is forbidden to appear or work while under the influence of alcohol, illegal drugs or legal drugs used illegally.
- Our people must not participate in the sale or distribution of illegal drugs or legal drugs in an illegal way, inside or outside GLOBAL PHARMA & LOGISTIC S.A.S., whether working or not.
- Our collaborators must report to their manager those events in which they consume any substance that affects their ability to work, even in cases where such consumption is in accordance with the legal provisions, the above, taking into account verbigracia that in some events even when the use of substances is legal, may alter the ideal conditions for the handling of some machinery, or in general, for the performance of some functions.

### **7.10.2 Discrimination**

Any attitude or type of discrimination based on race, gender, disability, religion, sexual orientation, etc. is completely unacceptable within the company. We seek to communicate to all employees the benefits of not discriminating, since we would work more safely, we would have a dignified work environment promoting respect and tolerance: "Less discrimination = greater productivity".

### **7.10.3 Violence**



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Violence of any kind, including threats within the workplace, whether towards other people or against company property, is not acceptable, as it inhibits the company's ability to provide a safe workplace.

#### **7.10.4 Gifts and perks**

We must not accept or offer gifts that could actually or potentially influence business decisions or create a sense of obligation. We must never compromise our ability to make objective business decisions in the best interest of GLOBAL PHARMA & LOGISTIC S.A.S. and must always avoid the appearance of bribery or impropriety.

Unless previously approved by management, we may not accept or offer gifts, meals, entertainment or hospitality that fit the following descriptions:

- Objects that are lavish, extravagant, inappropriate or have significant value.
- Create a sense of real or apparent obligation.
- Cash or cash equivalents, such as gift cards, coupons or vouchers.
- Occur in an inappropriate setting for business relationships.
- Are given for the improper purpose of expecting something in return, such as a favorable decision or the performance of a contract.

Gifts, meals, entertainment and hospitality may be accepted or provided only if:

- They are provided for the proper purpose of strengthening business relationships or demonstrating products or services.
- They are reasonable under the circumstances, such as occasional modest meals, occasional attendance at common spectator events, or gifts of nominal value (promotional items with the COMERCIALIZADORA DIAZ CASTAÑEDA logo).
- Christmas gifts from suppliers or customers are considered part of the company; for this reason, the director will define their disposition.

#### **7.10.5 Media**

With the exception of the Board of Directors and the Board of Partners, GLOBAL PHARMA & LOGISTIC S.A.S. employees are strictly prohibited from making any comments or disclosing



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any information to the press, radio, television or any other mass media, unless they have the express authorization of the General Manager to engage in any kind of relationship with the media.

### 7.11 Restrictions and Disciplinary Sanctions

Failure to comply with the provisions of this Code shall be considered a serious offense and the employees responsible for the omissions shall be subject to sanctions as provided by law and the internal work regulations.

The procedure for the application of sanctions shall be the responsibility of the assistant manager. For employees on mission, the sanctions will be in charge of the Temporary Services company that has a valid contract with GLOBAL PHARMA & LOGISTIC S.A.S., being the temporary services company their only and true employer.

Depending on the nature and seriousness of the situation, the administrative actions derived may be:

- Attention calls
- Suspension
- Termination of the contract or legal actions.

Since GLOBAL PHARMA & LOGISTIC S.A.S. is a private company, personnel of the company are subject to disciplinary law, according to the work internal rules. The most common disciplinary offenses are mentioned below:

- **Misconduct:** Aggression or threats to employees; prohibited games, abuse of authority, poor personal appearance, inadequate attention to customers, drunkenness, drug addiction, immoral attitudes, malicious or malicious comments towards people, mistreatment.
- **Time abuse:** Use of time for personal activities, non-performance of work, failure to fulfill work commitments, unexcused absence, unexcused tardiness, interference in the work of others, poor quality of work, counter productivity, low productivity or intentional prolonged performance of tasks, use of the internet or technological tools for non-work-related matters.
- **Theft and embezzlement:** Misappropriation or misuse of company property, resources and information, intentional deterioration of company property.



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- **Fraud and dishonesty:** Falsification of documents or reports; abuse of leave, disability or licenses; breach of trust.
- **Insubordination and disloyalty:** Disrespect to superiors; disloyalty to the company, speaking ill of the company to co-workers or third parties.
- **Malicious destruction of company property or documents:** Purpose to evade or conceal an improper act or action which is reported through company property or documents.
- **Non-compliance with security and control standards:** Improper use of company ID cards, allowing unauthorized persons to enter, transporting unauthorized personnel in company vehicles, omission of established procedures.

8. Our business partners

## 8.1 Relationships with business partners

### 8.1.1 Competitors

GLOBAL PHARMA & LOGISTIC S.A.S. will adopt mechanisms to avoid incurring in restrictive practices of free competition or unfair competition practices and will take measures to cooperate with trade union policies.

### 8.1.2 Suppliers

The selection and contracting of suppliers shall always be based on technical, professional and ethical criteria and on the needs of GLOBAL PHARMA & LOGISTIC S.A.S. Negotiations shall be carried out according to the process established in the Purchasing Manual, including the knowledge and evaluation of suppliers and the comparison of quotations, among others, with which the best cost/benefit ratio is sought:

- It will seek to establish with suppliers, mutually beneficial relationships based on quality, technical, professional, ethical criteria, and the needs of GLOBAL PHARMA & LOGISTIC S.A.S.
- Negotiations will be carried out according to the process established in the Purchasing policy, including the knowledge and evaluation of suppliers and the comparison of quotations, among others, which tend to the best cost / benefit ratio, efficiency, respect, the constant search for the common good and the best conditions for both parties.



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- Objective criteria shall be established for the selection of suppliers.
  - Suppliers shall declare if they have a direct relationship with any GLOBAL PHARMA & LOGISTICS collaborator.
- GLOBAL PHARMA & LOGISTIC S.A.S. either directly or through their spouse, partner or relative in 4th degree of consanguinity, 2nd degree of affinity and 1st civil.
- Suppliers who have conflicts of interest with GLOBAL PHARMA & LOGISTIC S.A.S. may not be suppliers unless authorized by the Board of Partners.
  - GLOBAL PHARMA & LOGISTIC S.A.S. will require the supplier to keep absolute confidentiality on all information that comes to their knowledge in the performance of their duties and whose disclosure could cause damage to the company, its employees or associates.
  - GLOBAL PHARMA & LOGISTIC S.A.S. suppliers who carry out any type of negotiation are prevented from disclosing details of the same such as: institutional or commercial secrets, correspondence, documents, among others.

### 8.1.3 Clients

GLOBAL PHARMA & LOGISTIC S.A.S. will respect the rights of the clients and will look for solutions that meet their interests, and will clearly express the conditions of the operations, in such a way that it is possible for the clients to know the integrity of the services, as well as the reciprocal obligations that may be generated from the commercial relationship.

In general, the information related to the relationship with a client is confidential, unless it is of a public nature. Any disclosure of information must be in accordance with the best interests of the client and GLOBAL PHARMA & LOGISTIC S.A.S. However, GLOBAL PHARMA & LOGISTIC S.A.S. may disclose the information when authorized by the client and in any case when any judicial or administrative authority requires it. The conversation or business information must be expressed in clear and specific terms that minimize the possibility of misinterpretation. For these purposes GLOBAL PHARMA & LOGISTIC S.A.S. guarantees that:

- The promotion of products and services offered by GLOBAL PHARMA & LOGISTIC S.A.S. will be expressed in plain language and provide a clear description of the relationship between the customer and the Company.
- It will expressly communicate to the applicants of the products and services offered by GLOBAL PHARMA & LOGISTIC S.A.S. in which cases it will request information to the





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credit bureaus to evaluate their credit situation and financial behavior. For this purpose, prior authorization will be requested from the client.

- GLOBAL PHARMA & LOGISTIC S.A.S. will deliver to its clients a copy of the contract or invoice after it has been subscribed, where you can find information specifying the relevant obligations and rights of the client.
- GLOBAL PHARMA & LOGISTIC S.A.S. will inform its customers by appropriate means about variations in the terms and conditions of their contractual relationship and give reasonable notice of the entry into force of any change.
- Requests, claims and requirements shall be met in a timely and accurate manner, in accordance with the law and the respective contracts.

#### **8.1.4 Authorities**

GLOBAL PHARMA & LOGISTIC S.A.S. relations with the Government and control and administration organizations shall always be handled within the framework of the law and following the principles established in the Code of Ethics and Conduct.

#### **9. Conflict of Interest**

##### **9.1 Conflict of interest on the part of employees**

A conflict of interest arises when an employee has a personal relationship and/or a financial interest that may affect and/or conflict with the interests of the company in order to obtain their own, therefore GLOBAL PHARMA & LOGISTIC S.A.S. requests, in the event of such conflict, to declare that they are not allowed to participate in the process that is being carried out. It is the duty of each employee to report any potential or actual conflict of interest to their immediate supervisor, assistant manager, or management, in order to take the necessary measures to deal with such situation.

It is the duty of employees to avoid the following situations:

- Providing work or consultancy services for persons or companies that are competitors of GLOBAL PHARMA & LOGISTIC S.A.S.
- Subjectively favoring a supplier or a client, to the detriment of another that has similar or better proposals.



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- Maintaining sentimental or family relationships with collaborators, suppliers or customers of the company, which produce favors or omission of reporting failures in the work activity.
- Receiving gifts or handouts during the celebration of a business deal.

### **9.1.1 General procedure for resolving conflicts of interest**

The employee who considers that he/she is facing a situation generating a conflict of interest, shall:

- Inform the compliance committee and/or the assistant manager that he/she is in a possible conflict of interest situation.
- Refrain from executing the operation and submit its execution or performance to the consideration of the immediate superior or the competent person within the established hierarchy.
- In the event that there is doubt in the qualification of the conflict, by the previous instance, the same shall be submitted to the consideration of the compliance committee of GLOBAL PHARMA & LOGISTIC S.A.S.

### **9.1.2 Guidelines for the prevention of conflicts of interest**

The following rules seek to avoid or prevent the occurrence of situations that constitute a conflict of interest in GLOBAL PHARMA & LOGISTIC S.A.S. operations and aim to prevail the company's values.

Conflicts of interest are governed under the following parameters:

- GLOBAL PHARMA & LOGISTIC S.A.S. operations shall be carried out in compliance with the requirements established by the relevant provisions and instructions, issued by both the external authorities regulating its activity and the internal ones, as appropriate. Consequently, GLOBAL PHARMA & LOGISTIC S.A.S. employees shall abide by the prohibitions and restrictions established therein that regulate their operations, in order to avoid conflicts of interest.





- The participation in the Board of Directors of any company by an employee of GLOBAL PHARMA & LOGISTIC S.A.S. must be reported to the Management of the company, which will approve or deny such participation.
- All GLOBAL PHARMA & LOGISTIC S.A.S. collaborators, their spouse and/or partner, relatives within the fourth degree of consanguinity, second degree of affinity or first civil degree shall be subject to the following provisions:
  - i. If the collaborator or the aforementioned persons are owners of direct or indirect investments in any company with current commercial relations with COMERCIALIZADORA DIAZ CASTAÑEDA, it is the obligation of the collaborator or the person in the service of the company, to inform such situation to the compliance committee and/or Human Management who will determine if there is a conflict of interest.
  - ii. All GLOBAL PHARMA & LOGISTIC S.A.S. collaborators and personnel in the service of GLOBAL PHARMA & LOGISTIC S.A.S. must declare that they are not allowed to participate in any decision in which they find a supervening personal conflict of interest.
  - iii. The collaborators who have under their responsibility the commercial relationship, the portfolio area or its management, may not maintain a business relationship (commercial type) with the people they serve operationally.

### 9.1.3 Individual and Organizational Interests

Managers, assistant managers, chiefs, coordinators and collaborators in general have the duty to ensure that any action different from their work relationship and that may represent additional profit, related to the activities of GLOBAL PHARMA & LOGISTIC S.A.S., is in conflict of interest.

All employees and managers must refrain from carrying out actions or participate in activities in which their personal interests generate or may generate conflicts with the interests of GLOBAL PHARMA & LOGISTIC S.A.S..

Any situation in which a real or potential conflict of interest arises must be reported by the employee to his immediate superior, who in turn must transfer it to the competent authority, in order to evaluate it and suggest the respective recommendations.

By virtue of the above, employees and managers:



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- Shall not participate in activities or manage businesses contrary to the interests of GLOBAL PHARMA & LOGISTIC S.A.S.
- Shall not establish companies or businesses that compete with GLOBAL PHARMA & LOGISTIC S.A.S. nor shall they be partners, collaborators or administrators of the same.
- Shall not conduct business of personal or family interest within GLOBAL PHARMA & LOGISTIC S.A.S. such as the purchase, sale or lease of equipment or property and participation or ownership in companies that have or seek to have business with him, unless authorized by his immediate superior and the entity responsible for compliance with this code.
- Decisions to participate or refuse to participate in a particular business may not be based on feelings of friendship or enmity of those who have the responsibility to decide.
- They shall not abuse their condition to obtain benefits for themselves or for third parties in the processing of claims or requests related to insurance, indemnities, or to obtain personal benefits from suppliers, contractors or customers.
- It is restricted for GLOBAL PHARMA & LOGISTIC S.A.S. employees and directors to participate in the management of other companies, if it causes a conflict of interest or interferes with the performance of their duties.
- Those who have the responsibility to contract or dispose on behalf of GLOBAL PHARMA & LOGISTIC S.A.S. may not do so with their spouse, partner or relatives within the 4th degree of consanguinity, 2nd degree of affinity and 1st Civil.
- The above recommendations do not constitute an exhaustive list of cases of conflicts of interest, so the GLOBAL PHARMA & LOGISTIC S.A.S. collaborator must evaluate any other situation that places him/her in a conflict of interest.

#### **9.1.4 Manipulation of the Business Opportunity**

The members of the Board of Partners, the Manager and his team of Directors and collaborators in general; may not take advantage for their own benefit or that of a relative or friend, of a business opportunity that is given or arises from GLOBAL PHARMA & LOGISTIC S.A.S. A business opportunity is understood as the realization of transactions or commercial operations that have arisen or have been discovered in connection with the exercise of the position or through the use of information obtained in GLOBAL PHARMA & LOGISTIC S.A.S.

#### **9.1.5 Obligation to Disclose Conflicts of Interest**



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Any conflict of interest arising with GLOBAL PHARMA & LOGISTIC S.A.S. from one of its partners, customers, suppliers, contractors, collaborators, or among them, must be reported to the company's compliance committee.

Suppliers, customers, partners and contractors must act putting the company's interests before their own and promoting this culture with our business partners specifically in:

- Not taking personal advantage of opportunities that become known due to the use of GLOBAL PHARMA & LOGISTIC S.A.S. property or information or through our jobs.
- Not to use GLOBAL PHARMA & LOGISTIC S.A.S. property or information for personal gain.

## 10. Work Safety

GLOBAL PHARMA & LOGISTIC S.A.S. is committed to provide its collaborators with all the necessary elements to protect their physical and mental integrity during their working days. The different areas and tasks are analyzed in order to establish improvements to avoid injuries, continuous improvement of emergency plans, training and updates for high-risk work and prevention and promotion activities are carried out.

In accordance with the above, it is the employee's duty to comply with the **PERSONAL PROTECTION ELEMENTS POLICY** in order to comply with all industrial safety and occupational health standards in the areas where they work and to immediately report accidents, practices, conditions and unsafe situations.