

TRANSPARENCY AND BUSINESS ETHICS POLICY

CAAISA's Transparency and Business Ethics Policy brings together all the guidelines and concepts that are mandatory for compliance with the operation of the PTEE (Transparency and Business Ethics Program), with the objective of directing and monitoring the actions of collaborators, partners, other interest groups and counterparts of the organization.

At CAAISA we are aware of all the national and international transaction processes that commit us to having constant monitoring and surveillance of Transnational Corruption and Bribery that is the responsibility of said program, which is why the company focuses its principles on:

1. Work and promote an institutional culture against corruption and transnational bribery.

2. The PTEE policy is mandatory for all interest groups that constitute the rules of conduct and may not be violated in any case.

3. The Compliance Officer will carry out actions to disseminate the PTEE Policy with its stakeholders against bribery, managing the economic, human and technological resources necessary for its compliance.

4. The Compliance Officer will be responsible for safeguarding and maintaining the supporting documentation of the Transparency and Business Ethics Program for a minimum period of five (5) years in digital form.

5. Conflicts of interest between the different parties related to the PTEE that may arise are resolved based on the guidelines of the Shareholders' Assembly, complying with the applicable regulations.

6. The Company will avoid having any type of relationship with suppliers, clients, employees and partners that are included in the binding and restrictive lists regarding Transnational Bribery.

7. Any type of relationship that may be generated with national or foreign PEPs must be validated by the Shareholders' Assembly in cooperation with the Compliance Officer and intensified due diligence must be applied for all cases.

8. Refrain from receiving and granting privileges, gifts or gifts to Company employees. The foregoing without prejudice to the necessary actions in order to know the services offered by third parties or special circumstances that imply the acceptance of invitations, recognitions or souvenirs, which will be reported to the competent authorities.

Review October 2023

CAAISA COMPAÑÍA AERO AGRÍCOLA INTEGRAL S.A.S NIT. 860.011.246-2 Contiguo al Aeropuerto Antonio Roldán Betancourt Km 7. Vía Zungo embarcadero. Predio San Sebastian Carepa, Antioquia 3214250058 | administracion@caaisa.com