



## Certificate of the Program of Compliance of Enlaza S.A.S. E.S.P - Enlaza

### TO WHOM IT MAY CONCERN

Enlaza is committed to the highest standards of conduct and corporate compliance. Hence, the Compliance Program has been defined to safeguard the company's integrity and achieve its objectives. The premise is ethical, transparent behavior aligned with the regulatory framework, ensuring the fulfillment of the higher purpose in an ethical manner, based on relationships of transparency and trust with employees and all stakeholders.

Senior Management promotes a culture to combat money laundering, terrorism financing, financing of weapons of mass destruction proliferation, fraud, bribery, and corruption. Also encourages strict adherence to guiding rules and best practices in compliance, not only to avoid sanctions or reputational impact but in response to the duty of all citizens and employees to act ethically and with integrity in all areas of their lives.

Enlaza maintains an unwavering commitment to integrating the components of the Control System in alignment with the "COSO" model. Concurrently, with the application of the Three Lines of Defense model, adhering to the standard proposed by the European Confederation of Institutes of Internal Auditing (ECIIA). This standard explicitly determines the responsibilities pertaining to the Internal Control System.

The Compliance Program is structured around three central axes: (i) Prevention, (ii) Detection, and (iii) Response. These pillars revolve around an ethical, robust, and suitable culture embraced by all Enlaza's employees. Its approach is based on compliance risk management, wherein the various components are classified into prevention, detection, and response, ensuring a process of continuous improvement and feedback for the program.

1. Adoption and implementation of methodologies and procedures related to the Compliance Program: To reinforce Enlaza's ethical culture, several key documents have been integrated into their Compliance Program. These guidelines set the standards for all stakeholders in the area of ethics and compliance:
  - a. Internal Code of Ethics and Conduct and Code of Ethics and Conduct for Suppliers and Contractors
  - b. Policies and Corporate Ethics, Anti-corruption and Anti-bribery Manual
  - c. ML/TF/FPWMD Prevention Manual and related procedures
  - d. Gifts and Hospitality Policy
  - e. Personal Data Protection Policy, Manual, and associated procedures
  - f. Control Architecture Policy
  - g. Conflicts of Interest Policy
  - h. Corporate Human Rights Policy
  - i. Risk Management Policy
  - j. Internal Work Regulations, among others

2. Compliance Report Presentation: Every six months, the Compliance Director presents a report to the Company's Board of Directors. This report covers various activities executed under the Compliance Program aimed at preventing bribery, fraud, corruption, money laundering, terrorism financing, weapons of mass destruction proliferation, inappropriate handling of personal data, and inadequate management of conflicts of interest.
3. Training, Communications, and Employee and Stakeholder Education regarding the Compliance Program: Enlaza establishes an annual communications and training program. The initiative is tailored for employees, Senior Management, the Board of Directors, administrators, suppliers, contractors, and customers. The fundamental objective is to enhance the robust ethical foundations upon which the Company is built. While following guidelines from the parent company, this initiative respects a risk-based focus. Additionally, there is an aim to deliver essential tools and education. These resources help stakeholders comprehend the associated risks and identify the necessary controls to prevent the manifestation of compliance risks. The program promotes the development of behavior steeped in integrity and other corporate values. Ultimately, there is a strive to be a beacon of exemplary behavior within the Organization, encouraging a ripple effect of outstanding conduct.
4. Risk Management: The main stages included in the Entity's risk management cycle are identification, measurement or valuation, control, and monitoring, following the Risk Management Policy defined by the Entity. The risk management function of the program entails verifying the effectiveness of the controls for managing, preventing, or mitigating risks, and identifying new causes or controls that align with business dynamics, existing standards, or best practices.
5. Due Diligence and Enhanced Due Diligence Procedures: The Company has adopted a cross-functional approach in implementing basic and extended due diligence measures. For example, binding international restrictive lists for Colombia are periodically reviewed, as well as national and international control lists, to identify potential alerts relating to stakeholders. Enhanced due diligence procedures are also performed where warranted, among other practices.
6. Monitoring and Corrective Actions: The compliance program operates on the premise that any deviation from the ethical framework that cannot be effectively prevented must be detected and remedied. This is achieved through a timely and effective response, an appropriate investigation, and the definition and implementation of corrective measures following an investigation report. Monitoring aims to identify non-compliances, gaps, or deviations in the company's operations that pose a risk to the company.
7. Semiannual verification by the Statutory Auditor: Every six months, the Company's statutory auditor: (i) verifies compliance with internal and external controls to prevent ML/TF/FPWMD and (ii) issues its opinion on the financial statements. As of this document's date, the Statutory Auditor has not presented observations or qualifications on the activities developed in accordance with the stipulations of the regulations related to the prevention of ML/TF/FPWMD.
8. Whistle-Blowing Channel: An ethical channel has been established by the Company, managed by an independent third party in line with good business and governance practices. This channel is accessible via the website, intranet, and in the Code of Ethics and Conduct. This channel facilitates the proper receipt, management, and monitoring



of complaints, inquiries, and ethical dilemmas. It's important to note that any matters reported through this channel are handled with the utmost confidentiality. Anonymous reporting is permitted, and retaliation for using the channel is strictly prohibited, demonstrating a commitment to whistleblower protection.

9. Personal Data Protection: The Company is committed to the proper handling of personal data for all data subjects. Therefore, the importance of having a Personal Data Protection Program that aligns with the Colombian Personal Data Protection Regime is recognized. The Personal Data Protection Program is led by the Personal Data Protection Officer, who is a member of the Corporate Compliance Department. This officer's role is to structure, design, manage, evaluate, and review the Personal Data Protection Program. The Company's Personal Data Protection Program comprises the following elements: (i) Policy, Manual, procedures and formats that make up the Personal Data Protection Program; (ii) Training and education; (iii) Inventory of Databases and National Database Registry; (iv) Personal Data Protection Risk Management; (v) Management of Personal Data Protection incidents; (vi) Management of Trusted Individuals; and (vii) Management of Personal Data Protection Inquiries and Complaints.

In line with the above, I hereby affirm that the Company has been complying with the internal and external regulations regarding the Compliance Program, pursuant to the prevailing laws applicable to Enlaza's legal nature.

Sincerely,

[ORIGINAL SIGNED]  
**LUIS RODOLFO HERNÁNDEZ CASADIEGO**  
Corporate Compliance Director (E)

Period 2024