

ANNEX 2: REPORT ON THE IMPLEMENTATION OF BEST CORPORATE PRACTICES

REPORT ON THE IMPLEMENTATION OF BEST CORPORATE PRACTICES

BUSINESS NAME OF THE ISSUER: CONSTRUCTORA CONCRETO S. A.

PRINCIPAL LEGAL REPRESENTATIVE: JUAN LUIS ARISTIZÁBAL VÉLEZ

**LEGAL REPRESENTATIVE DESIGNATIVE TO SEND THE IMPLEMENTATION REPORT:
JUAN LUIS ARISTIZÁBAL VÉLEZ**

REPORTING PERIOD: JANUARY TO DECEMBER 2022

REPORTING DATE: JANUARY 31, 2023

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INTRODUCTION

The implementation of the Recommendations of the new Code of Best Corporate Practices of Colombia must be reported by the Issuers to the Office of the Financial Superintendency of Colombia (SFC, in Spanish) through this Report on the Implementation of Best Corporate Practices.

The objective of this report is to inform the stock market about the implementation or not of the Recommendations of the Code by each Issuer. For this purpose, in front of each Recommendation there are three boxes corresponding to YES, NO and N/A (Not Applicable), as well as a space to complement your answer as follows:

If the answer is affirmative, the issuer must briefly describe the way in which this implementation has been carried out. If the answer is negative, the issuer must explain the reasons why it has not accepted it.

The N/A response can only be provided by the Issuer in those cases in which, for legal reasons, it is not possible to adopt the Recommendation. In this event, you must indicate precisely the rule that prevents it.

Given that some Recommendations are made up of a series of specific aspects, it is important to highlight that these shall only be considered implemented if all the aspects that compose them are fulfilled, unless the reason for not adopting some of them is legal, which must be indicated.

Each Recommendation has a box to indicate the date the Issuer first implemented it. Additionally, there will be a box where the dates on which changes are made will be recorded.

Finally, when due to its nature the Issuer does not have the specific body to which the Recommendation refers, it shall be understood that it refers to the body that, within the entity, is equivalent or takes its place.

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I. RIGHTS AND FAIR TREATMENT OF SHAREHOLDERS

Measure No. 1: Principle of Equal Treatment

1.1. The Company provides equal treatment to all Shareholders who, within the same class of shares, are in the same conditions, without this implying access to privileged information of some Shareholders with respect to others.

1.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The principle of equal treatment is regulated in Chapter 7 Number 1 of the Code of Good Corporate Governance, which indicates that the Company and its Administrators guarantee respect for this principle. Likewise, it enshrines rights in favor of the Shareholders, such as the right to receive information from the Company with the same detail and timeliness, resolve queries prior to and during the Assembly meetings, present proposals for consideration by the Board of Directors, and request that the Assembly be summoned. These rights must be exercised in the terms indicated in the Code of Good Corporate Governance, which is published on the Company's Website: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p> <p>Additionally, the Company has provided means of attention through which concerns or doubts that Shareholders may have are channeled and answers are given to these questions, without this implying the disclosure of privileged information or the granting of differentiated treatment from others. Information on these channels is contained in the following link: https://conconcreto.com/atencion-al-inversador/#id-atencion-accionista</p> <p>Through the "Relevant Information" mechanism enabled by the Financial Superintendency on its website, the Company makes publications on the most important situations that may affect – in one way or another – the behavior of the share in the stock market, in turn guaranteeing fair, equal treatment to Shareholders in reference to the information they receive from the Company.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/25/2011
Modification Dates	12/18/2015

1.2. The Board of Directors has approved a specific procedure that defines the Company's practices **to relate to different Shareholders of different conditions**, in matters such as access to information, response to information requests, communication channels, interactions between Shareholders and the Company, its Board of Directors and other Administrators.

1.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

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The procedure established by the Company to communicate with Shareholders is regulated in Chapter 7 Number 2 of the Code of Good Corporate Governance, which establishes the regulation regarding access to information, respecting the principle of equal treatment and the complete, timely and truthful disclosure of the Company's financial and non-financial information, the procedure through which Shareholders can resolve frequently asked questions or directly contact the Shareholder Service Office for the purpose of resolving concerns, as well as information on the different communication channels through which the Company discloses information to the market. These procedures are published on the Company's Website:
<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/25/2011
Modification Dates	12/18/2015

Measure No. 2: Information about Shares

2.1. On its Website, **the Company discloses to the public** with clarity, accuracy and integrity **the different Classes of Shares issued** by the Company, the number of Shares issued for each Class and the number of Shares in Reserve, as well as the rights and obligations inherent to each Class of Shares.

2.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

Chapter 7 Number 1 of the Code of Good Corporate Governance states that the Social Capital is divided into Ordinary, Nominative and Capital Shares, which give their holders equal rights in the Company assets and in the benefits that are distributed, as well as one vote for each share, in the deliberations of the General Shareholders' Assembly, all of which is published on the Company's Website:

<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

Likewise, on the Company's Webpage <https://conconcreto.com/detalle-de-la-accion/#id-composicion-accionaria>, information is found regarding the Outstanding Shares and the Reserve Shares, among other information related to the Share, of interest for Investors and the public in general.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/25/2011
Modification Dates	12/15/2016

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Measure No. 3: No Dilution of Capital

3.1. In operations that may result in the dilution of the Capital of the minority Shareholders (in case of a Capital increase with waiver of the Right of Preference in the subscription of Shares, a merger, spin-off or segregation, among others), the Company explains them in detail to Shareholders in a previous report of the Board of Directors, and with the opinion, on the terms of the transaction, from an independent external advisor of recognized solvency (a fairness opinion), designated by the Board of Directors. These reports are made available to the Shareholders prior to the Assembly within the terms to exercise the Right of Inspection.

3.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>In Article 31 Paragraph 2 and Article 42 Number 21, the Company Corporate Bylaws establish that in any operation that may lead to the dilution of minority Shareholders, it shall be the obligation of the Board of Directors to prepare a detailed report of the operation that has the opinion of an independent expert advisor. This report shall be available to the Shareholders prior to the Assembly meeting where the operation will be discussed, in the same terms established to exercise the Right of Inspection. Concreto's Corporate Bylaws can be consulted on the Company's Website: https://concreto.com/gobierno-corporativo/#id-centro-descargas</p> <p>Additionally, it is noted that, during the 2022 period, no operations were carried out that could lead to the dilution of the Minority Shareholders' Capital.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	03/27/2015

Measure No. 4: Information and Communication with Shareholders

4.1. The Company has a Corporate Website, in Spanish and in English, with a link to Corporate Governance or Relationship with Shareholders and Investors or the equivalent, which includes financial and non-financial information under the terms proposed in Recommendations 32.3 and 33.3 and that, in any case, may not include confidential information of the Company or information related to industrial secrets, or the disclosure of which may be used to the detriment of the Company.

4.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Company has a Website https://concreto.com/, in Spanish and English. On this page, there is a link entitled "Investors," where the Company's financial and non-financial information can be found. Within it, there is a section entitled "Corporate Governance," where information on the Company's Governing Bodies, the Corporate documents that govern it and other information of interest is published. On this site, there are also links to access the Annual and Quarterly Financial Information,</p>
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Annual Management Report, Share Information, Relevant Information, Services for Shareholders and Contact Information.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/25/2011
Modification Dates	12/15/2016

4.2. The Company has permanent access and use mechanisms exclusively intended for Shareholders, such as a link on the Website for exclusive access to Shareholders, or an Attention Office or Shareholder and Investor Relations Office, periodic information meetings, among others, for them to express their opinions or raise concerns or suggestions about the Company's development or those associated with their status as Shareholders.

4.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
Chapter 7, Number 2.3 of the Code of Good Corporate Governance establishes the communication channels provided by the Company so that Shareholders can express their opinions or present their concerns and suggestions, all of which is published on the Company's Website: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas .
Likewise, on the Company's Website https://conconcreto.com/inversionistas/ , there is an access link entitled "Shareholder Services" with information of interest in relation to the Share and its coverage, dividends, certificates, and frequently asked questions, among others. Finally, the Company has a Department entitled "Investor Relations," which Shareholders can permanently contact. During 2022, 35 requests were submitted to this unit, which were fully resolved.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/25/2011
Modification Dates	12/18/2015

4.3. The Company organizes Quarterly Results presentation events for its Shareholders and market analysts, which can be held in person or through remote communication means (conference, videoconference, etc.).

4.3 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
The Company holds Quarterly teleconferences with access via streaming through an access link from the Company's Website, where the Company's CEO presents the most-relevant news of the period and presents the Financial Information and Results. On the Company's

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Website at the link https://conconcreto.com/resultados-financieros/ , the Financial Statements, the presentation used in the teleconference, the webcast thereof, among other documents of interest, are published. During 2022, four events were held to present Quarterly Results.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/25/2011
Modification Dates	11/09/2016

4.4. The Company organizes or participates in fixed-income presentations, events or forums, mainly intended for **Investors in debt instruments and market analysts**, where the Issuers' Business Indicators, the management of its Liabilities, its Financial Policy, Ratings and Behavior regarding covenants, etc., are updated.

4.4 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
NO. Explain: The Company only issues Variable-Income Securities.
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	
Modification Dates	

4.5. The Company's Corporate Bylaws stipulate that a Shareholder or a group of Shareholders representing at least five percent (5%) of the Capital may request Specialized Audits on matters other than those audited by the Company's Fiscal Auditor. Depending on its Capital structure, the Company may determine a percentage lower than five percent (5%).

4.5 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The procedure for a group of Shareholders representing at least 5% of the Capital to request that Specialized Audits be carried out is regulated in Article 58 of the Corporate Bylaws , which indicates that the request must be made in writing to the Board of Directors' Chairperson, who shall present it to the full Board of Directors to decide on the viability of the audit, communicating in writing to the applicants the determination adopted by the Board of Directors. The Company's Corporate Bylaws can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas . It is also reported that, during 2022, no Shareholder made use of this prerogative.
NO. Explain:

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N/A. Specify the regulations that prevent adopting the recommendation:
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Implementation Date	03/27/2015
Modification Dates	03/27/2015

4.6. To exercise this right, **the Company has a written procedure** in place with the details contemplated in Recommendation 4.6.

4.6 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Article 58 of the Corporate Bylaws regulates the detailed procedure to request Specialized Audits, which establishes the requirements to request the audit, the Company's obligation, through its Board of Directors, to respond in writing to the requesting Shareholders, the way to designate who shall conduct the audit, the determination of who should bear its cost and the precise deadlines for each of the stages or steps of the procedure. Its details can be consulted at: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	03/27/2015

Measure No. 5: Action of the Administrators before exchange operations or taking control of the Company.

5.1. In their Letter of Acceptance or contracts, the members of the Board of Directors and Senior Management have expressly accepted that – based on the knowledge of the presentation of Public Offer of Acquisition (OPA, in Spanish) or other relevant operations, such as mergers or spin-offs – there will be periods during which they shall undertake not to negotiate, directly or indirectly through third parties, the Company's Shares.

5.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>This obligation is regulated in Article 11, Number 15 of the Internal Regulations of the Board of Directors, which is published on the Company's Website at the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p> <p>Additionally, the members of the Board of Directors and Senior Management have – in their Letter of Acceptance – have expressly agreed not to directly or indirectly negotiate Company shares through an intermediary person when they become aware of the presentation of an OPA or other relevant operations, such as mergers or spin-offs.</p>
<p>NO. Explain:</p>

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N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	01/29/2016

Measure No. 6: Listing of Companies Integrated in Conglomerates

6.1. Notwithstanding the independence of each individual company integrated in the Conglomerate and the responsibilities of its administrative bodies, the Conglomerate has an organizational structure that defines the three (3) government levels – the Shareholders’ Assembly, the Board of Directors and Senior Management – the key individual bodies and positions, as well as the relations among them, which must be public, clear and transparent, and which allows determining clear lines of responsibility and communication, and facilitates the strategic guidance, supervision, control and effective management of the Conglomerate.

6.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company has a Business Group Policy by virtue of which the organizational structure, the duties assigned to each level of government, as well as the responsibility and lines of communication between them are presented at the conglomerate level. This policy is published on the Company's Website and can be consulted at the link https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	06/21/2019
Modification Dates	06/21/2019

6.2. The Parent Company and its most important Subordinates have defined an Institutional Relations Framework through the execution of an agreement, which is of a public nature and approved by the Board of Directors of each of these companies, and regulates the issues indicated in Recommendation 6.2.

6.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company has a Business Group Policy, which is published on the Company's Website, within which a reference framework for institutional relations is established. Likewise, the Legal Representatives of the companies that make up the Group have signed a public Framework Agreement that is in line with the Business Group Policy approved by the Board of Directors. The referenced Policy and Framework Agreement can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:

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N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/11/2020
Modification Dates	12/11/2020

Measure No. 7: Dispute Resolution

7.1. Except for disputes among Shareholders, or between Shareholders and the Company or its Board of Directors, which – due to an express legal attribution – must necessarily be settled before the ordinary jurisdiction, **the Company Corporate Bylaws include mechanisms for the resolution of disputes, such as direct settlement, amiable composition, conciliation or arbitration.**

7.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Company's Corporate Bylaws establish that the differences that occur among the Shareholders or between them and the Company – due exclusively to these Corporate Bylaws, their development or interpretation, during the term of the Company due to its dissolution or during the process of liquidation – shall be resolved by an Arbitration Court. This mechanism is regulated in Article 14 of the Corporate Bylaws , which are published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-discargas.</p> <p>Additionally, during 2022, there were no disputes between shareholders, or between shareholders and the company or its board of directors, which should be resolved through alternative dispute resolution mechanisms or by ordinary jurisdiction.</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/25/2011
Modification Dates	01/25/2016

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II. THE GENERAL SHAREHOLDERS' ASSEMBLY

Measure No. 8: Duties and Competence

8.1. In addition to other duties attributed to the General Shareholders' Assembly under the legal framework, **the Corporate Bylaws expressly include the duties of the General Shareholders' Assembly indicated in Recommendation 8.1**, and emphasize their exclusive, non-delegable nature.

8.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
NO. Explain: Article 37, Paragraphs a, l and f, of the Company's Corporate Bylaws incorporate the duties indicated in this Recommendation as duties of the General Shareholders' Assembly. Likewise, the Paragraph of the same Article indicates that some of these duties are of an exclusive and non-delegable nature of the General Shareholders' Assembly. The duties of the Assembly can be consulted in the Company's Corporate Bylaws, which are published on the Company's website: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas .
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	
Modification Dates	

Measure No. 9: Regulations of the General Shareholders' Assembly

9.1. The Company has Regulations for the General Shareholders' Assembly, which regulate all matters pertaining to it, from its summons to the preparation of the information that Shareholders must receive; attendance, development and exercise of the political rights of Shareholders, so that they are completely informed of the development of the Assembly meetings.

9.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company has Internal Regulations for the General Shareholders' Assembly published on its Website, which can be accessed through https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas . These Regulations regulate the summons, attendance at meetings, the information made available to Shareholders, development of the meeting, development and exercise of the political rights of Shareholders and the rules relating to the participation and interventions of the Shareholders in the Assembly meetings, among others.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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Implementation Date	03/25/2011
Modification Dates	12/18/2015

Measure No. 10: Summoning the Assembly

10.1. To facilitate the exercise of Shareholders' right to information, **the Corporate Bylaws establish that the Ordinary General Shareholders' Assembly must be summoned no less than thirty (30) calendar days in advance and extraordinary meetings must be summoned no less than fifteen (15) calendar days in advance.** The foregoing, without prejudice to the legal terms established for business reorganizations (for example, merger, spin-off or transformation).

10.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Company's Corporate Bylaws provide that, for ordinary meetings of the General Shareholders' Assembly, they will be summoned with no less than 30 calendar days in advance, and for extraordinary meetings, no less than 15 calendar days in advance. In any case, the Corporate Bylaws establish that if – in the meeting it is intended to discuss a business reorganization (spin-off, merger and transformation) – the summons shall be made thirty (30) calendar days before the date of the meeting. The rules regarding the summons for meetings of the highest Corporate Body can be found in Article 31 of the Corporate Bylaws and in Chapter I, Article 4 of the Internal Regulations of the Shareholders' Assembly, which are published on the Company's Website at the following links: <https://conconcreto.com/gobierno-corporativo/#id-centro-descargas> and <https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas>, respectively. For the ordinary meeting held on March 31, 2022, this Recommendation was complied with, making the summons on February 28, 2022; that is, 30 calendar days in advance.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

10.2. In addition to the traditional and mandatory means established in the legal framework, **the Company ensures the maximum dissemination and publicity of the summons** through the use of electronic media, such as the Corporate Website, alert messages through individual Emails and, even – if deemed pertinent – through social networks.

10.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

In Article 31 of the Corporate Bylaws and, in the same sense, in Article 4 of the Internal Regulations of the Shareholders' Assembly, it is indicated that the summons may be made through electronic means, written communication addressed to each of the Shareholders, to the address registered in the Company books, or through publication on the Company's Website or the one that takes its place or through a notice published in a newspaper of national circulation or through social

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networks. The Regulations can be accessed through the following link: <https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas>.

Additionally, it is added that, for the year 2022, the Company made the summons through publication in the newspaper *La República*, a newspaper with wide circulation; the market was informed of this fact through the Relevant-Information Reporting Mechanism; the summons notice was published on the Company's Website in a tab entitled "Assembly," where Investors could find the information related to it. During the days prior to the meeting, a pop-up was also included that appeared immediately when accessing the Company's Website with the information related to the meeting; and notice was given through social networks of the place, date and time of the meeting to be held, thus guaranteeing a wide dissemination and publicity of the summons.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

10.3. In order to increase the transparency of the decision-making process during the General Assembly, in addition to the Order of the Day of the meeting with the point-by-point statement of the topics that will be discussed, **the Company has established that simultaneously with the summons or, at least, fifteen (15) days before the meeting, the Agreement Proposals** that the Board of Directors shall submit to the General Shareholders' Assembly for each item of the Agenda **shall be available to Shareholders.**

10.3 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

In Article 31 of the Company Corporate Bylaws and Chapter I, Article 4 of the Internal Regulations of the Shareholders' Assembly, this Measure is incorporated. The Company Corporate Bylaws and the Regulation can be consulted at the following links: <https://conconcreto.com/gobierno-corporativo/#id-centro-descargas> and <https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas>, respectively.

Prior to the 2022 Assembly meeting, the Company published on its Website, in the link provided for the purpose entitled "Assembly," both the summons, which includes the Order of the Day of the meeting, as well as the proposed resolutions that the Board of Directors submitted for consideration by the Shareholders' Assembly for each item on the Order of the Day. These resolution proposals included a suggestion from this body to the Shareholders regarding the direction of their vote.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

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10.4. An incorrect spin-off can only be analyzed and approved by the General Shareholders' Assembly when this item has been expressly included in the summons of the respective meeting.

10.4 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Article 31, Paragraph 2, of the Corporate Bylaws establish that, in the event of an improper spin-off, the respective point must be included in the Order of the Day of the meeting. Likewise, it is indicated that the Administrators must prepare a report on the reasons for the proposal, which will be available to the Shareholders for the period of the summons, which must be made at least thirty (30) calendar days prior to the meeting where the proposal will be considered. The Company's Corporate Bylaws can be consulted at the following link to the Company's Website: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p> <p>Additionally, during 2022, the approval of an improper spin-off was not considered by the Company Shareholders.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	03/27/2015

10.5. The Order of the Day proposed by the Board of Directors precisely includes the contents of the topics to be addressed, avoiding that any issues of transcendence are hidden or masked under imprecise, generic, too-general or broad mentions such as "Others" or "Proposals and Miscellaneous".

10.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The measure is regulated in the Article 31 of the Corporate Bylaws , which states that in all summons, the Order of the Day will be inserted specifying the points to be discussed. Likewise, in the summons for meetings of the Shareholders' Assembly, the Company's Management chooses not to include imprecise or general items in the Order of the Day, such as "proposals and miscellaneous", without neglecting the possibility that Shareholders have to raise concerns or make proposals during the Assembly meeting, for which the space is opened at the end of the meeting in an item in the Order of the Day entitled "Shareholder Proposals." The proposed Order of the Day for the ordinary meeting of the Assembly held in 2022 precisely included the points to be discussed and the space for proposals from the Shareholders. The Company Corporate Bylaws can be consulted on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>

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N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	03/27/2015

10.6. In the case of amendment of the Corporate Bylaws, each article or group of articles that are substantially independent **shall be voted on separately**. In any case, an article is voted separately if any Shareholder or group of Shareholders, representing at least five percent (5%) of the Social Capital, so requests it during the Assembly, a right that has been previously disclosed to Shareholders.

10.6 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
 One of the duties of the Shareholders' Assembly is to amend the Company's Corporate Bylaws, for which each article or group of articles that are substantially independent must be voted on separately. It is also established that an article will be voted on separately if a Shareholder or group of Shareholders, representing at least five percent (5%) of the Social Capital, requests it during the Assembly. The measure is regulated in Article 37, Point d of the Corporate Bylaws and in Article 4 of the Internal Regulations of the Shareholders' Assembly, which are published on the Company's Website at the following links: <https://conconcreto.com/gobierno-corporativo/#id-centro-descargas> and <https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas>

 During 2022, the reform of the Corporate Bylaws was not considered by the Shareholders during the ordinary meeting of the General Assembly.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

10.7. Notwithstanding the provisions of Article 182 of the Commercial Code, with the purpose of strengthening and ensuring the right of inspection and information of Shareholders prior to the meeting of the Assembly, the Corporate Bylaws recognize the right of Shareholders, regardless of the size of their Shareholding, to propose the introduction of one or more items to be discussed in the Order of the Day of the General Shareholders' Assembly, within a reasonable limit and provided that the request for new items be accompanied by a justification. The request by Shareholders must be made within five (5) calendar days following the publication of the summons.

10.7 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
 Within the five (5) calendar days following the publication of the summons, Shareholders will have the right, regardless of their Shareholding, to propose the introduction of one or more points to be

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debated within the Order of the Day of the ordinary meeting of the General Shareholders' Assembly or to present new Agreement Proposals, as long as these requests are accompanied by a justification. Requests will be submitted through the Shareholder Service Office, which will submit the request to the Board of Directors for analysis. The procedure for dealing with requests from Shareholders is regulated in Article 31, Paragraph 1 of the Corporate Bylaws , a document that has been published on the Company's Website and can be consulted at the following link:

<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

During 2022, no requests for the inclusion of items in the Order of the Day for the ordinary meeting of the General Shareholders' Assembly were submitted.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	03/27/2015

10.8. If the request is rejected by the Board of Directors, **the Board of Directors is required to reply in writing** to any supported requests, at least by a percentage of five percent (5%) of the Social Capital, or a lower percentage established by the Company according to the degree of ownership, **explaining the reasons for its decision and** informing the Shareholders of the right they have to submit their proposals during the Assembly, in accordance with the provisions of the aforementioned Article 182 of the Commercial Code.

10.8 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

If once the process of the request made by the Shareholders has been completed, the Board of Directors finds reasons to reject the request, the Order of the Day will not be modified, nor will the Agreement Proposal be included, and a written response will be given to the proposing Shareholder(s), when the petition has been presented for a number of Shares that represent at least five (5%) percent of the Company's Subscribed Capital. The measure is regulated in Article 31, Paragraph 1 and Article 43, Numbers 22 and 23 of the Corporate Bylaws , the procedure of which can be consulted through the following link:

<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

During 2022, no requests for the inclusion of items in the Order of the Day for the ordinary meeting of the General Shareholders' Assembly were submitted.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

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10.9. In the event that the Board of Directors accepts the request, once the Shareholders' time to propose topics has elapsed in accordance with the above Recommendations, **a supplement to the summons of the General Shareholders' Assembly shall be published** at least fifteen (15) calendar days before the meeting.

10.9 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>One of the duties of the Board of Directors is to publish the supplement to the summons for the General Shareholders' Assembly, in the event that the request for an addition to the Order of the Day or a Proposed Agreement is accepted by this body. This publication must be made after the five (5) calendar days that the Shareholders have to present the requests and fifteen (15) calendar days before the date on which the ordinary meeting of the General Shareholder's Assembly will be held. The above procedure is regulated in Article 31 Paragraph 1 and Article 42 Number 24 of the Corporate Bylaws , which can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p> <p>During 2022, no requests for the inclusion of items in the Order of the Day for the ordinary meeting of the General Shareholders' Assembly were submitted.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
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10.10. Within the same period indicated in Paragraph 10.7, **Shareholders can also submit new Agreement Proposals, with proper justification**, on matters previously included in the Order of the Day. For these requests, the Board of Directors shall act similarly as established in Paragraphs 10.8 and 10.9 above.

10.10 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Shareholders may request new Resolution Proposals following the same procedure established for the introduction of new items on the Order of the Day. The procedure for this purpose is regulated in Article 31 Paragraph 1 and in Article 42 Number 24 of the Corporate Bylaws , published on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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Implementation Date	03/27/2015
Modification Dates	03/27/2015

10.11. The Company undertakes to use electronic means of communication, primarily the Corporate Website with exclusive access to Shareholders, to send them the documents and information associated with each of the items on the Order of the Day of the meeting.

10.11 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Article 4 of the Internal Regulations of the Shareholders' Assembly states that the documents and information related to the items on the Order of the Day of the meeting shall be available to the Shareholders, physically, at the Company's facilities, as well as electronically on the Corporate Website. The Internal Regulations of the Assembly can be consulted on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas</p> <p>During 2022, the Company enabled a microsite within the Corporate Website in which the different models of Powers of Attorney, the Resolution Proposals, the Order of the Day, the Profit-Distribution Project and other instructions to be taken into account by the Shareholders were published and, in general, by those attending the Shareholders' Assembly. This information is public since the Company considers that it is not necessary to exercise the Right of Inspection, as an accessory right to vote.</p> <p>Additionally, it is reported that, for the period evaluated, the Company enabled an exclusive access microsite for Shareholders through which, after registering, they could view the documents related to the Order of the Day of the meeting and exercise their Right of Inspection virtually. Likewise, identical information was made available to the Shareholders at the Company's Administration Offices, so that they could exercise their Right of Inspection in person. It is clarified that access to this site is only enabled during the period in which, by statutory provision, Shareholders can exercise the Right of Inspection.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	12/18/2015

10.12. The Company's Corporate Bylaws recognize the right of Shareholders to request in advance the information or clarifications they may deem pertinent, through traditional channels and/or, where appropriate, new technologies, or to formulate in writing the questions they deem necessary in relation to the matters included in the Order of the Day, the documentation received or the public information provided by the Company. Depending on the deadline chosen by the Company to summon the General Shareholders' Assembly, the Company shall determine the period within which Shareholders may exercise this right.

10.12 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p>

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The Company has provided communication channels with Shareholders through which they can request information or clarifications on the Order of the Day, the documentation received or public information provided by the Company, indicating that the Shareholders may use the contact button on the Company's Website or contact the Shareholder Service Office by phone or by email at ir@conconcreto.com. The procedure established to exercise the indicated right is regulated in the Corporate Bylaws in Article 38, published on the Company's Website at the following link: <https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>.

It is also highlighted that to exercise the Right of Inspection during the period evaluated, a Website was created with access restricted to Shareholders, who decided to exercise this right, who were assigned a Username and Password for their individual access, where they could remotely access all the information required by current regulations for the Right of Inspection.

On the other hand, the Company enabled the following email: asambleas@conconcreto.com, through which all queries made by Shareholders in relation to the ordinary meeting of the Assembly were channeled. In this period, there were requests from some Shareholders requesting access to the exclusive website for Shareholders through which they could exercise the Right of Inspection.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	03/27/2015

10.13. The Company has established that the information requested may be denied if, according to internal procedures, it can be classified as: (i) unreasonable; (ii) irrelevant to have knowledge of the Company's progress or interests; (iii) confidential, which will include insider information in the field of the securities market, industrial secrets, operations in progress the purpose of which for the Company depends substantially on the secrecy of the negotiation; and (iv) others, the disclosure of which may jeopardize its competitiveness.

10.13 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

Article 38 of the Corporate Bylaws establishes that the request for information indicated may be denied by the Company when it considers that it is: (i) unreasonable; (ii) irrelevant to know the progress of the Company's interests; (iii) confidential (including privileged information, and the scope of the stock market, industrial secrets, operations in progress, the good outcome of which for the Company depends substantially on the secrecy of its operation); and (iv) others, the disclosure of which would imminently and seriously endanger the Company's competitiveness. The regulations regarding requests for information regarding the Order of the Day can be consulted in the Company's Corporate Bylaws through the following link: <https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

NO. Explain:

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N/A. Specify the regulations that prevent adopting the recommendation:	
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Implementation Date	03/27/2015
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10.14. When the answer provided to a Shareholder can put it at an advantage, **the Company shall ensure access to this answer to other Shareholders** concomitantly, in accordance with the mechanisms established for that purpose and under the same conditions.

10.14 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: In compliance with the principle of equal treatment, the Company has established that – if by virtue of the right to request information, a Shareholder is given an advantage with the information that is provided – the Company shall guarantee access to this information to the other Shareholders concomitantly. The measure is enshrined in the Paragraph of Article 38 of the Corporate Bylaws , published on the Company's Website and which can be accessed through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	03/27/2015

Measure No. 11: Regulation of the Representation

11.1. Notwithstanding the limits established in Article 185 of the Commercial Code, External Circular Letter 24 of 2010, and any regulations that modify, add to or substitute them, **the Company does not limit the Shareholders' right to be represented at the General Shareholders' Assembly**, and they may delegate their vote to any person, whether they be a Shareholder or not.

11.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 16 of the Corporate Bylaws states that Shareholders may be represented at the Shareholders' Assembly by means of a Power of Attorney granted in writing subject to legal requirements, with the legal requirements being the only restrictions imposed on the Shareholder's Right to be represented in the Assembly. In the same sense, this Right is established in Article 7 of the Internal Regulations of the Shareholders' Assembly, also indicating that the Company will make a Power-of-Attorney form available to Shareholders on its Website. Both the Bylaws and the Internal Regulations of the Shareholders' Assembly can be consulted at the following links https://conconcreto.com/gobierno-</p>
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corporativo/#id-centro-descargas and https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

11.2. The Company minimizes the use of blank voting delegations, without voting instructions, actively promoting the use of a standard representation-letter model that the Company shall send to Shareholders or publish on its Website. The model includes the items on the Order of the Day and the corresponding Agreement Proposals determined in accordance with the previously established procedure and which shall be submitted to Shareholders for consideration, for Shareholders to indicate, if deemed appropriate, in each case, their vote to their representative.

11.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company makes Power-of-Attorney forms available to Shareholders, which include the items on the Order of the Day and the proposed resolutions, so that the Shareholder can indicate, in each case, the direction of their vote to their representative. The Power-of-Attorney forms for the 2022 ordinary meeting were published on the Company's Website prior to the Assembly meeting, in the link designated for the purpose entitled "Assembly."
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	04/30/2016

Measure No. 12: Attendance of Persons Other than Shareholders

12.1. With the purpose of revitalizing the role of the General Assembly in shaping the Corporate will and making it a much more participatory body, the **Company Regulations of the Assembly require the members of the Board of Directors and, in particular, the Chairmen of the Board of Directors' Committees, as well as the Company CEO, to attend the Assembly** to answer Shareholder concerns.

12.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The measure is regulated in Article 12 of the Internal Regulations of the Shareholders' Assembly and in Article 11 Number 14 of the Internal Regulations of the Board of Directors, where it is enshrined as a duty of

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the Company CEO and of the members of the Board of Directors, especially the Chairmen of the Committees, to attend the meetings of the Shareholders' Assembly. Likewise, at the meeting of the Board of Directors in preparation for the Shareholders' Assembly, the members of the Board of Directors are invited to participate in this meeting. The regulations can be consulted on the Company's Website at the following links:

<https://conconcreto.com/gobierno-corporativo/#id-asamblea-accionistas> and <https://conconcreto.com/gobierno-corporativo/#id-junta-directiva>

Regarding the period evaluated, in the ordinary meeting of the General Shareholders' Assembly, held on March 31, 2022, the Company CEO participated in his capacity as Chairman of the meeting and answered the questions presented by the Shareholders during it. Likewise, Dr. Nora Aristizábal López, Chair of the Company's Board of Directors, attended the ordinary meeting of the Assembly and Dr. Carlos Eduardo Restrepo Mora, patrimonial member of the Board of Directors and of the Corporate Governance Committee, participated in the meeting on behalf of their Shares.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

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III. THE BOARD OF DIRECTORS

Measure No. 13: Duties of the Board of Directors

13.1. The Bylaws expressly indicate the **duties that cannot be delegated to Senior Management**, which include those established in Recommendation 13.1.

13.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 42 of the Company's Corporate Bylaws provides that the Board of Directors delegates the ordinary course of business to the Senior-Management team, concentrating its activity on the general duties of strategy, supervision, governance and control. Number 19 of this Article indicates that some of the duties may be delegated to the CEO as long as it is not prohibited by law or by the Company's Corporate Bylaws. Finally, Number 52 of this Article indicates the duties that cannot be delegated to Senior Management, which are consistent with those indicated in this measure. The Company's Corporate Bylaws are published on the Website and can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	01/25/2016

13.2. Notwithstanding the autonomy of the governing bodies of the Subordinated Companies, **when the Company acts as the Parent Company of a Conglomerate**, these duties of the Board of Directors have a group focus and **are developed through general policies, guidelines or requests for information that respect the balance between the interests of the Parent Company and the interests of the Subordinates and the Conglomerate as a whole.**

13.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: In Article 42 Paragraph 1, the Corporate Bylaws have adopted this measure by establishing that the duties of the Company's Board of Directors, acting as the Parent Company of the Business Group, have a group approach and are developed through general policies, guidelines or requests for information that respect the balance between the interests of the Parent Company and those of its Subsidiaries. The Corporate Bylaws can be consulted at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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Implementation Date	03/27/2015
Modification Dates	03/27/2015

Measure No. 14: Regulation of the Board of Directors

14.1. The Board of Directors has approved the Internal Regulations that regulate its organization and operation, as well as the duties and responsibilities of its members, the Board of Directors' Chairperson and the Secretary, and their duties and rights. It is disseminated among Shareholders and is binding for the members of the Board of Directors.

14.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Company has an Internal Regulation of the Board of Directors, the purpose of which is to include the principles, rules and procedures that govern the operation of the Board of Directors, thereby seeking to facilitate its management and provide greater transparency, efficiency and certainty to its actions, indicating that the Regulations will be applicable to the Board of Directors as a Collegiate Body and to its members. The Internal Regulations of the Board of Directors can be consulted on the Company's Website through the following link: <https://conconcreto.com/gobierno-corporativo/#id-junta-directiva>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/25/2011
Modification Dates	12/18/2015

Measure No. 15: Dimension of the Board of Directors

15.1. The Company has statutorily decided not to designate Alternate Members of the Board of Directors.

15.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Company's Corporate Bylaws indicate that the Company's Board of Directors is made up of 10 principal Directors, elected by the General Assembly for periods of two (2) years, freely removable or re-electable. Likewise, Article 40 of the Bylaws establishes that there will be no Alternates on the Board of Directors. The Company's Bylaws can be consulted at the Corporate Webpage through the link <https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>.

In the ordinary meeting of the Shareholders' Assembly held on March 31, 2022, the Board of Directors was appointed, to complete the two (2) year statutory period, where 10 principal members were appointed, without alternates, complying with this Recommendation.

NO. Explain:

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N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2009
Modification Dates	03/27/2009

Measure No. 16: Formation of the Board of Directors

16.1. Based on the premise that once elected, all the members of the Board of Directors shall act in the benefit of the Company with utmost transparency, **the Company has identified the origin of the various members of the Board of Directors** according to the scheme defined in Recommendation 16.1.

16.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate: Article 42 Paragraph 2 of the Company's Bylaws classifies the members of the Board of Directors according to their origin as Executive, Independent and Patrimonial Members. In the Annual Corporate-Governance Report and on the Company's Website in the link related to the Board of Directors, the origin of each member of the Governing Body is identified based on the classification indicated.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	03/27/2015

16.2. The Company has a procedure, articulated through the Appointments and Remuneration Committee or another body that fulfills its duties, which allows the Board of Directors, through its own dynamics and on the basis of the conclusions of annual evaluations, to achieve the objectives indicated in Recommendation 16.2.

16.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company has established as a duty of the Human Talent Committee to determine the functional and personal profiles required for the Board of Directors, as well as to evaluate the time required to adequately perform in the position. This Recommendation is enshrined in Article 5 Number 9 of the Internal Regulations of the Human Talent Committee and in Article 22 Number 9 of the Internal Regulations of the Board of Directors, which can be consulted at the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva The functional and personal profiles that are currently required for the formation of the Board of Directors were approved at the meeting of the

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Human Talent Committee on December 13, 2019, and these were ratified by the Board of Directors at the meeting on February 21, 2020.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

16.3. The professional profiles identified as necessary are reported by the Board of Directors to Shareholders, so that the various Stakeholders, primarily Controlling Shareholders, Significant Shareholders, Families, Groups of Shareholders and Institutional Shareholders, if any, and the Board itself, are capable of identifying the most suitable Candidates.

16.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Article 2 of the Internal Regulations of the Board of Directors establishes that the professional profiles to form the Board of Directors are reported, through the Website to the Shareholders, in such a way that the different actors, primarily Controlling Shareholders, Significant Shareholders, Families, Groups of Shareholders and Institutional Shareholders, if any,, and the Board of Directors itself, are in a position to identify the most-suitable candidates. The indicated regulation can be consulted at the link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva.</p> <p>Additionally, the profiles of the members are published on the Company's Website and can be permanently consulted by the Shareholders through the following link: https://conconcreto.com/gobierno-corporativo/#id- Board of Directors.</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

16.4. The Company considers that the mere evaluation of rèsumès by Shareholders is an insufficient resource to determine the suitability of Candidates; which is why it has an internal procedure to evaluate the legal incompatibilities and disqualifications and the suitability of the Candidate for the needs of the Board of Directors, through the evaluation of a set of criteria that must meet the functional and personal profiles of the Candidates, and the verification of the fulfillment of some objective requirements to become a member of the Board of Directors and other additional requirements to become an Independent Member.

16.4 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

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<p>NO. Explain: During 2022, the General Shareholder’s Assembly carried out the election of the members of the Board of Directors to complete the biannual period due to the resignation presented by Richard Francioli, representative of the VINCI Group. Pursuant to the Shareholder Agreement in force for the Company, VINCI Group nominated Patrick Sulliot, thus complying with one of the profiles defined by the Human Talent Committee at a meeting on December 13, 2019, ratified by the Board of Directors at a meeting on February 21, 2020; that is, the membership of the VINCI Group of two (2) members of the Board of Directors.</p> <p>Additionally, Jaime Alberto Ángel Mejía resigned from the Board of Directors on March 29, 2022, two (2) days before the ordinary meeting of the General Shareholders’ Assembly; therefore, it was not possible for the Human Talent Committee and the Board of Directors to carry out an evaluation of the adequacy of the proposed candidate. Even though this was the case, Dr. Ana Karina Quessep Alcové, a member who was elected to replace Mr. Ángel Mejía, has extensive financial knowledge, in digital transformation and relations with State entities, thus complying with the profiles that were defined by the Company’s Board of Directors as strategic for its formation.</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	
Modification Dates	

16.5. In addition to the independence requirements already established in Law 964 of 2005, **the Company has voluntarily adopted a more rigorous definition of independence** than that established in the aforementioned Law. This definition has been adopted as a reference framework through its Regulations for the Board of Directors, and includes, among other requirements that must be evaluated, the relationships or ties of any nature of the Independent Member Candidate with controlling or significant Shareholders and their national and foreign Related Parties, and requires a double declaration of independence: **(i)** from the Candidate before the Company, its Shareholders and members of Senior Management, instrumented through his/her Letter of Acceptance and, **(ii)** from the Board of Directors, regarding the Candidate’s independence.

16.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Recommendation is enshrined in Article 3 of the Internal Regulations of the Board of Directors, which indicates the conditions that must be met by the person who holds the status of Independent Member. In compliance with the measure, for the period evaluated, the members of the Board of Directors who have such a quality have sent the Company a Declaration of Independence, where they have undertaken to report any circumstance that may affect their status as Independent, indicating that during this period, the Board of Directors did not issue a Declaration of Independence regarding these members. The Internal Regulations of the Board of Directors can be consulted at the link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>

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N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

16.6. Through its Internal Regulations, the Company considers that the Board of Directors, through its Chairperson and with the support of the Appointment and Remuneration Committee or whoever performs its duties, is the most appropriate body to centralize and coordinate the process of forming the Administrative Body prior to the General Assembly. Thus, the Shareholders who, based on their Shareholding, aspire to be part of the Board of Directors, can know the needs of the Board of Directors and raise their aspirations, negotiate the stock balances and the distribution among the different categories of members, present their candidates and accept that the suitability of their Candidates be evaluated by the Appointment and Remuneration Committee before the voting of the General Shareholders' Assembly.

16.6 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: As a duty of the Appointment and Remuneration Committee, the Company has determined to support the Board of Directors' Chairperson by centralizing and coordinating, prior to the General Assembly, the process of forming the Administrative Body. This obligation is enshrined in Article 22 Number 25 of the Internal Regulations of the Board of Directors and in Article 5 Number 5 of the Internal Regulations of the Human Talent Committee. These regulations can be consulted on the Company's website at the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

16.7. The Regulations of the Board of Directors provide that the evaluation of the suitability of Candidates is an activity the execution of which must be carried out prior to the holding of the General Shareholders' Assembly, so that Shareholders have sufficient information (personal qualities, suitability, track record, experience, integrity, etc.) about the Candidates proposed to integrate it, with sufficient anticipation so as to allow their proper evaluation.

16.7 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 3 of the Internal Regulations of the Board of Directors establishes that the evaluation of the suitability of the Candidates shall be carried out prior to the General Shareholders' Assembly, in such a way that the Shareholders have sufficient information on the Candidates proposed to integrate it, in advance that allows its adequate evaluation. The internal regulations of the Board of Directors can be consulted at the link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>

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On its Website, the Company publishes, prior to the holding of the Assembly meetings in which the appointment of the Board of Directors must be made, the resumes of the Candidates, so that the Shareholders can know first-hand and prior to this meeting, the personal qualities, suitability, trajectory, experience and integrity of the people proposed to integrate the Administrative Body. Additionally, the Company updates the Website constantly, in such a way that the market has updated information on the Company's financial and corporate, which includes the profiles and resumes of the people that make up the Board of Directors. For the 2022 period, for the ordinary meeting of the 2022 Shareholders' Assembly, the Company enabled a microsite within the Corporate Website, in which the resumes of the Candidates for members of the Board of Directors were made available to the Shareholders.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

Measure No. 17: Functional Structure of the Board of Directors

17.1. The Regulations of the Board of Directors stipulate that Independent and Patrimonial Members are always the majority with respect to Executive Members, the number of which, in the event of being integrated into the Board of Directors, is the minimum necessary to meet the information and coordination needs of the Company's Board of Directors and Senior Management.

17.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Recommendation is enshrined in Article 3 of the Internal Regulations of the Board of Directors, which establishes that at least 30% of the members shall be Independent Members, who – together with the Patrimonial Members – shall be the majority with respect to the Executive Members. Additionally, the Executive Members will be a minimum number necessary to meet the information and coordination needs between the Board of Directors and the Company's Senior Management. For the 2022 period, only one of the 10 members that make up the Board of Directors had Executive status and five members of the 10 have an Independent status. The Internal Regulations of the Board of Directors can be consulted in the link: <https://conconcreto.com/gobierno-corporativo/#id-junta-directiva>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

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17.2. Based on the minimum percentage of twenty-five percent (25%) of Independent Members established by Law 964 of 2005, **the Company analyzes and voluntarily adjusts, upwards, the number of Independent Members**, taking into account, among others, that the number of Independent Members is related to the Floating Capital.

17.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The recommendation is enshrined in Article 3 of the Internal Regulations of the Board of Directors, which establishes that at least 30% of the members shall be Independent Members. For the 2022 period, 50% of the members of the Board of Directors have the quality of Independent, thus complying with the Recommendation. The Independent status of the members of the Board of Directors is disclosed on the Company's Website and in the Annual Corporate-Governance Report.</p> <p>The internal regulations of the Board of Directors can be consulted at the Company's Webpage through the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

Measure No. 18: Organization of the Board of Directors

18.1. The duties of the Board of Directors Chairperson are indicated in the Bylaws and his/her main responsibilities are those established in Recommendation 18.1.

18.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Company has incorporated in Article 13 of the Internal Regulations of the Board of Directors the duties established in this Recommendation for the Board of Directors' Chairperson. The Internal Regulations of the Board of Directors can be consulted at the link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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18.2. The Company's Internal Regulations establish the possibility that **the Board of Directors Chairperson may have a different treatment from other members**, both in terms of obligations and remuneration, as a result of the scope of his/her specific duties and greater dedication of time.

18.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 13 of the Internal Regulations of the Board of Directors indicates that – taking into account that the Board of Directors' Chairperson has additional obligations to those of the other members of the Board of Directors that imply greater responsibilities and dedication of time – the remuneration of the Board of Directors' Chairperson may be higher than the remuneration of the other Board Members at the discretion of the Shareholders' Assembly. During the period evaluated, the Shareholders' Assembly did not approve a differentiated remuneration for the Board of Directors' Chairperson. The Internal Regulations of the Board of Directors can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
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18.3. The Bylaws include the rules for the appointment of the Board of Directors Secretary, which include those indicated in Recommendation 18.3.

18.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Company has determined that the Secretary of the Board of Directors will be the Company's Secretary General and that, to safeguard the independence of the Secretary of the Board of Directors, from the Company CEO, his/her appointment and removal will correspond to the Board of Directors at the proposal of the Company's CEO, with a prior report from the Human Talent Committee, and being or not being a member of the Board of Directors. The foregoing is regulated in Article 14 of the Internal Regulations of the Board of Directors, which can be consulted on the Corporate Webpage at the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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18.4. The Board of Directors Regulations establish the duties of the Secretary, including those indicated in Recommendation 18.4.

18.4 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 14 of the Internal Regulations of the Board of Directors establishes the duties performed by the Secretary, among which are those indicated in this Recommendation. The Internal Regulations of the Board of Directors can be consulted on the Company's Webpage through the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
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18.5. The Board of Directors has created an Appointment and Remuneration Committee

18.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: It is the duty of the Board of Directors to set up a Human Talent Committee, in compliance with the mandate established in Article 42, Number 37 of the Corporate Bylaws and in Articles 69 to 73. In the same sense, Article 16 of the Internal Regulations of the Board of Directors indicates that the Company will have the mentioned Committee. Finally, the Internal Regulations of the Human Talent Committee regulates the operation and obligations of the members of this Committee. Information regarding the Human Talent Committee, as well as its Regulations, can be consulted on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
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18.6. The Board of Directors has created a Risk Committee

18.6 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p>
<p>NO. Explain:</p>

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The Company has not set up an independent Risk Committee. Despite the foregoing, the duties entrusted to the Risk Committee have been handed over to the Audit Committee, as can be seen in Article 10 of the Internal Regulations of the Audit Committee, published on the Company's Website at link: <https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva>

N/A. Specify the regulations that prevent adopting the recommendation:

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18.7. The Board of Directors has created Corporate-Governance Committee

18.7 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

It is the duty of the Board of Directors to set up a Corporate-Governance Committee, in compliance with the mandate established in Article 42 Number 37 of the Corporate Bylaws, and in Articles 64 to 68 *ibidem*. In the same sense, Article 16 of the Internal Regulations of the Board of Directors indicate that the Company will have the aforementioned Committee. Finally, the Internal Regulations of the Corporate-Governance Committee regulates the operation and obligations of the members of this Committee. Information regarding the Corporate-Governance Committee, as well as its Regulations, can be consulted on the Company's Website through the following link: <https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

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18.8. If the Company has considered that it is not necessary to create all these Committees, their duties shall be distributed among the existing Committees or shall be assumed by the Board of Directors in full.

18.8 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Risk and Audit Committee works as one, under the name of the Audit Committee. The duties of this Committee can be consulted in the Internal Regulations of the Audit Committee published on the Company's Website at the following link: <https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva>

NO. Explain:

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N/A. Specify the regulations that prevent adopting the recommendation:

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18.9. Each of the Board of Directors’ Committees has Internal Regulations that regulate the details of its creation, the duties on which the Committee must work, and its operations, paying special attention to the communication channels between the Committees and the Board of Directors and, in the case of Conglomerates, to the relationship and coordination mechanisms between the Parent Company Board of Directors’ Committees and those of Subordinated Companies, if any.

18.9 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Each Committee has its own Internal Regulations that are published on the Company's Website, which can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p> <p>Additionally, based on the provisions of Article 4 Number 1 of the Business Group Policy, none of the Subordinate Companies of the Company have a Board of Directors.</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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18.10. The Board of Directors’ Committees are made up exclusively of Independent or Patrimonial Members, with a minimum of three (3) members and chaired by an Independent Member. In the case of the Appointment and Remuneration Committee, the Independent Members are always the majority.

18.10 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
<p>NO. Explain: This provision is enshrined in the Internal Regulations of the Board of Directors’ Committees, as well as in Articles 20, 21 and 22 of the Internal Regulations of the Board of Directors. The information regarding the composition of the Board of Directors’ Committees is published on the Company’s Website at the following link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p> <p>Additionally, based on the provisions of Article 4 Number 1 of the Business Group Policy, none of the Subordinate Companies of the Company have a Board of Directors.</p>

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N/A. Specify the regulations that prevent adopting the recommendation:
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18.11. The Board of Directors' Committees can obtain specific or permanent support from members of Senior Management with experience on the matters of their competence and/or from external experts.

18.11 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Articles 12 and 16 of the Internal Regulations of the Board of Directors indicate that the Board of Directors and/or any of its members may request the opinion of independent specialists – who will be hired according to the criteria and the Company's general hiring policies – in the specific cases in which it deems it convenient. Likewise, members of Senior Management attend the meetings of the Board of Directors' Committees, depending on the matter in question, to provide their support if deemed necessary. For the 2022 period, no external advisors were contracted by the Board of Directors' Internal Committees. The Internal Regulations of the Board of Directors can be consulted on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
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18.12. For the integration of its Committees, the Board of Directors takes into consideration the profiles, knowledge and professional experience of the members in relation to the Committee's subject matter.

18.12 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 16 of the Internal Regulations of the Board of Directors establishes that, for the composition of its Committees, the Board of Directors takes into consideration the profiles, knowledge and professional experience of the members in relation to the subject matter of the Committee. The Internal Regulations of the Board of Directors can be consulted on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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18.13. Minutes shall be drawn up from the Committee meetings, a copy of which shall be sent to all the members of the Company’s Board of Directors. If the Committees have delegated decision-making powers, the Minutes shall conform to the provisions of Articles 189 and 431 of the Commercial Code.

18.13 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>In accordance with the provisions of Article 71 of the Corporate Bylaws and Article 4 of the Internal Regulations of the Human Talent Committee, Article 66 of the Corporate Bylaws and Article 4 of the Internal Regulations of the Corporate-Governance Committee and Article 61 of the Corporate Bylaws and Article 9 of the Internal Regulations of the Audit Committee, Minutes of the meetings of the Committees shall be drawn up, a copy of which is sent to all the members of the Company’s Board of Directors. The regulations of the Board of Directors’ Internal Committees and the Company’s Corporate Bylaws can be consulted at the following links: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
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18.14. Unless the applicable legal or regulatory framework requires their creation, in the case of the Conglomerates, the Internal Regulations stipulate that **the Boards of Directors of the Subordinate Companies may choose not to create specific Committees** to manage certain matters and these tasks shall be assumed by the Parent Company Board of Directors, without this implying a transfer to the Parent Company of the responsibility of the Boards of Directors of Subordinated Companies.

18.14 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p>
<p>NO. Explain:</p> <p>In accordance with the provisions of Article 4 Number 1 of the Company’s Business Group Policy, no Subordinate Company has a Board of Directors. The Business Group Policy can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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18.15. The primary task of the Audit Committee is to assist the Board of Directors in its supervisory role by evaluating the accounting procedures, the relationship with the Fiscal Auditor and, in general, the revision of the Company’s Control Architecture, including the audit of the Risk-Management System implemented by the Company.

18.15 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Article 5 of the Internal Regulations of the Audit Committee establishes that the principal task of the Audit Committee is to assist the Board of Directors in its duty of supervising the Internal-Control System, through the evaluation of accounting procedures, the relationship with the Fiscal Auditor and, in general, the review of the Company’s control environment, including the audit of the Risk-Management System implemented by the Company. The regulations of the Audit Committee can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p> <p>Quarterly, the Audit Committee carries out a review of the principal risks to which the Company was exposed during that period and other situations that were relevant to the business for each of the Quarters; it monitors the risks identified in previous meetings and conducts a review of the Financial Statements.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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18.16. The members of the Audit Committee have accounting, financial and other associated knowledge, which allows them to make rigorous pronouncements on issues within the Committee’s competence with a sufficient level to understand their scope and complexity.

18.16 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Recommendation is enshrined in Article 20 of the Internal Regulations of the Board of Directors and in Article 6 of the Internal Regulations of the Audit Committee, and in compliance thereof, the members of the Audit Committee have accounting, financial and other associated knowledge, which allows them to pronounce rigorously on the issues of competence of the Committee with a sufficient level to understand its scope and complexity. The Internal Regulations of the Board of Directors and the Internal Regulations of the Audit Committee are published on the Company’s Website at the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
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The r�sum�s of the members that make up the Board’s Audit Committee can be consulted on the Corporate Website.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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18.17. At the request of the Assembly Chairperson, **the Chairperson of the Audit Committee shall inform the General Shareholders’ Assembly** about specific aspects of the work carried out by the Committee, such as the analysis of the scope and content of the Fiscal Auditor’s Report.

18.17 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Corporate Bylaws incorporate this Recommendation by indicating that information on specific aspects of the work carried out by the Audit Committee may be requested by the Chairperson of the Shareholders’ Assembly from the Chairperson of the Audit Committee. Annually, in the Annual Corporate-Governance Report that is presented at the ordinary meeting of the Shareholders’ Assembly, information is given on the issues worked on during the period by each Committee of the Board of Directors; this Report is made available to the Shareholders throughout the period of the summons, which is subsequently submitted for approval by the Shareholders at the ordinary meeting of the Shareholders’ Assembly and is subsequently published for consultation on the Company’s Website. The aforementioned Regulation is found in the Article 37 Point m of the Corporate Bylaws, published on the Company’s Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p> <p>At the General Shareholders’ Assembly held on March 31, 2022, no request was made by the Chairman of the Meeting to the Chairman of the Audit Committee to report on specific aspects of the work carried out by the Committee.</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
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18.18. The Audit Committee Internal Regulations establish the duties indicated in Recommendation 18.18.

18.18 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

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<p>The duties attributed to the Audit Committee indicated in this Recommendation are enshrined in Article 10 of the Internal Regulations of the Audit Committee and in Article 20 of the Internal Regulations of the Board of Directors. These Regulations are published on the Company's Website and can be consulted at the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
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18.19. The primary objective of the Appointment and Remuneration Committee is to support the Board of Directors in the exercise of its decision-making or advisory duties associated with the appointment and remuneration matters of the Board of Director members and Senior Management and to supervise the observance of the rules on Corporate Governance, periodically reviewing its fulfillment, recommendations and principles (in cases in which this duty is not expressly attributed to another committee of the Company).

18.19 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Company has established that the main objective of the Appointment and Remuneration Committee is to support the Board of Directors in the exercise of its decision-making or advisory duties associated with matters of appointments and remuneration of the members of the Board of Directors and of Senior Management. This provision is enshrined in Article 5 of the Internal Regulations of the Human Talent Committee and in Article 22 of the Internal Regulations of the Board of Directors. The regulations of the Human Talent Committee and the Regulations of the Board of Directors can be consulted on the Company's Website at the following links: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p> <p>Additionally, the observance of the Corporate-Governance rules is a duty expressly attributed to the Corporate-Governance Committee, as established in Article 5 Number 10 of the Internal Regulations of the Corporate Governance Committee, which can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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18.20. Some members of the Appointment and Remuneration Committee have knowledge on strategy, human resources (recruitment and selection, hiring, training, administration or personnel management), salary policy and related matters, with a sufficient level to understand the scope and complexity of these issues for the Company.

18.20 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Recommendation is enshrined in Article 22 of the Internal Regulations of the Board of Directors and in Article 3 of the Internal Regulations of the Human Talent Committee, which establishes that some Committee members must have knowledge in strategy, human resources (recruitment and selection, hiring, training, administration or personnel management), salary policy and related matters, with a sufficient level to understand the scope and complexity that these matters present in the Company. The foregoing, considering that all the members of the Committee are or have been entrepreneurs in different sectors of the economy, and as leaders of the organizations in which they have participated, they have developed extensive knowledge in these matters from business practice. The Internal Regulations of the Human Talent Committee and the Internal Regulations of the Board of Directors are published on the Company's Website at the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
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18.21. At the request of the Assembly Chairperson, the Chairperson of the Appointment and Remuneration Committee may inform the General Shareholders' Assembly about specific aspects of the work carried out by the Committee, such as, for example, the follow-up on the remuneration policies of the Board of Directors and Senior Management.

18.21 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Recommendation is enshrined in Article 37 Point n of the Corporate Bylaws, which indicates that information on specific aspects of the work carried out by the Committee may be requested through the Chairperson of the Shareholders' Assembly, from the Chairperson of the Human Talent Committee. Annually, in the Annual Corporate-Governance Report that is presented at the ordinary meeting of the Shareholders' Assembly, information is given on the issues worked on during the period by each Board of Directors' Committee; this report is made available to Shareholders throughout the period of the summons, which is subsequently submitted for approval by the Shareholders at the ordinary meeting of the Shareholders' Assembly and is subsequently published for consultation on the Company's website. The Company's Bylaws can be consulted on the Company's website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>

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At the General Shareholders' Assembly, held on March 31, 2022, no request was made by the Chairperson of the Assembly to the Chairperson of the Human Talent Committee to report on specific aspects of the work carried out by the Committee.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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18.22. The Appointment and Remuneration Committee Internal Regulations establish the duties indicated in Recommendation 18.22.

18.22 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The duties attributed by this Recommendation to the Human Talent Committee are enshrined in Article 5 of the Internal Regulations of the Appointment and Remuneration Committee and in Article 22 of the Internal Regulations of the Board of Directors. These Regulations are published in the Company's Website and can be consulted at the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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18.23. The primary objective of the **Risk Committee is to assist the Board of Directors in fulfilling its supervisory responsibilities in relation to risk management.**

18.23 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The duties attributed to the Risk Committee are under the responsibility of the Audit Committee. During 2022, this Committee met four (4) times and in each of its meetings it was in charge of conducting a review of the risks with the greatest impact for the Company and other situations that were relevant to the business for each of the Quarters. It is regulated in Article 10 of the Internal Regulations of the Audit Committee, published on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva
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NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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18.24. At the request of the Assembly Chairperson, **the Chairperson of the Risk Committee may inform the General Shareholders' Assembly** about specific aspects of the work carried out by the Committee.

18.24 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The duties of the Risk Committee are under the responsibility of the Audit Committee. This Recommendation is regulated in Article 37 Point m of the Corporate Bylaws, published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p> <p>At the General Shareholders' Assembly, held on March 31, 2022, no request was made by the Assembly Chairperson to the Audit Committee Chairperson to report on specific aspects of the work carried out by the Committee.</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
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18.25. With the adjustments that may be necessary to make a distinction among companies that belong to the financial sector or the real sector of the economy, and notwithstanding the duties assigned to this Committee under the regulations in force, **the Risk Committee Internal Regulations include the duties established in Recommendation 18.25.**

18.25 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The duties of the Risk Committee are under the responsibility of the Audit Committee. The duties of this Committee are enshrined in Article 10 of the Internal Regulations of the Audit Committee, which is published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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18.26. The primary task of the Corporate-Governance Committee is to **assist the Board of Directors in its duties regarding the proposals and supervision of the Corporate-Governance measures** implemented by the Company.

18.26 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Company has established that the primary task of the Corporate-Governance Committee is to assist the Board of Directors in its duties of proposals and supervision of the Corporate-Governance measures adopted by the Company, as well as to monitor compliance with the Corporate-Governance rules, periodically reviewing their compliance, recommendations and principles. Compliance with the duties of the Committee is evidenced in the framework of the Annual Corporate-Governance Report, in which the issues that the Committee worked on during the period are communicated to Shareholders. This report is made available to the Shareholders throughout the period of the summons; it is submitted for approval by the Shareholders at the ordinary meeting of the Shareholders' Assembly and, subsequently, it is published for consultation on the Company's Website. The Recommendation is enshrined in Article 5 of the Internal Regulations of the Corporate-Governance Committee and in Article 21 of the Internal Regulations of the Board of Directors. These Regulations are published on the Company's Website and can be consulted at following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
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18.27. The Corporate-Governance Committee Internal Regulations establish the duties indicated in Recommendation 18.27.

18.27 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The duties attributed to the Corporate-Governance Committee in this Recommendation are enshrined in Article 5 of the Internal Regulations of the Corporate-Governance Committee, which can be consulted on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
<p>NO. Explain:</p>

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N/A. Specify the regulations that prevent adopting the recommendation:
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Implementation Date	12/18/2015
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Measure No. 19: Duties of the Board of Directors

19.1 The Board of Directors Chairperson with the assistance of the Secretary and the Company CEO **shall prepare a work plan of the Board of Directors** for the period under evaluation, a tool that will facilitate the determination of the reasonable number of ordinary meetings per year and their estimated duration.

19.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>The Board of Directors with the presence and participation of the Company CEO and the Board of Directors' Secretary prepare the calendar of meetings of the Board of Directors and the Internal Committees of the Board for the following year, a tool that makes it easy to determine the reasonable number of ordinary meetings to be scheduled per year and their estimated duration. Similarly, Article 13 Number 10 of the Internal Regulations of the Board of Directors establishes the duty of the Board of Directors Chairperson, consisting of preparing – with the assistance of the Secretary and the Company CEO – a work plan for the Board of Directors for the evaluated period, a tool that facilitates determining the reasonable number of ordinary meetings per year and their estimated duration. The Internal Regulations of the Board of Directors can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
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19.2. Except for those entities subject to control required to hold at least one (1) meeting per month, **the Company's Board of Directors holds between eight (8) and twelve (12) ordinary meetings per year.**

19.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Both Article 41 of the Corporate Bylaws and Article 7 of the Internal Regulations of the Board of Directors establish that the Board of Directors must meet ordinarily at least eight (8) times a year. For this, in the last meeting of the year the Board of Directors approves a schedule of the meetings that will be held in the following period, without prejudice to the fact that it may meet on an additional number of occasions if it deems it convenient. For the 2022 period, 13 meetings of the Board of</p>

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Directors were held, thus complying with the Recommendation. The Corporate Bylaws and the Internal Regulations of the Board of Directors are published on the Company's Website at the following links: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas and https://conconcreto.com/gobierno-corporativo/#id-junta-directiva
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

19.3. One (1) or two (2) meetings per year of the Board of Directors shall have a focus clearly directed to the definition and monitoring of the Company's Strategy.

19.3 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Recommendation is enshrined in Article 41 of the Corporate Bylaws and in Article 7 of the Internal Regulations of the Board of Directors, which indicate that at least one of the meetings of the year will have a focus clearly oriented to the definition and follow-up of the Company's Strategy. Throughout the period, in several of the meetings of the Board of Directors, strategic issues for the Company were discussed, such as the detailed monitoring of investment projects in which the Company participates and the definition of lines of action regarding relevant procedures for the Company. In all meetings of the Board of Directors, a special space is set aside to monitor, review and determine the particular Strategies to be implemented in each project in which the Company participates. These provisions are published on the Company's Website at the following links: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas and https://conconcreto.com/gobierno-corporativo/#id-junta-directiva
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	12/18/2015

19.4. The Board of Directors shall approve a specific schedule of ordinary meetings, notwithstanding the fact that, on an extraordinary basis, it may meet as many times as necessary.

19.4 Measure Is Implemented YES NO N/A

YES. Briefly indicate: This Recommendation is regulated in Article 41 of the Corporate Bylaws and in Article 5 of the Internal Regulations of the Board of Directors, which establish that, at the first meeting of the year, after their

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<p>appointment, the schedule for regular meetings throughout the year shall be approved. However, the Board of Directors may meet on dates other than those provided for in the Annual Calendar of Sessions, when it so decides. The Corporate Bylaws and the Internal Regulations of the Board of Directors can be consulted on the Company's Website through the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

19.5. Together with the summons of the meeting and, at least, five (5) calendar days in advance, the documents or information associated with each item of the Order of the Day shall be delivered to the Board of Director members, so that they can actively participate and make decisions in a reasoned manner.

19.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Recommendation is enshrined in Article 5 of the Internal Regulations of the Board of Directors, which indicates that the summons to the Board of Directors' meetings shall be at least five (5) calendar days in advance, also indicating that the information and/or documentation will be sent with the summons to be discussed at the respective meeting. The Regulation indicated can be consulted on the Corporate Webpage through the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

19.6. The Board of Directors Chairperson shall assume, with the assistance of the Board of Directors' Secretary, **the ultimate responsibility for members to receive useful information in advance**, so that the set of documents delivered (the Board of Directors dashboard) must prioritize quality over quantity.

19.6 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The responsibility of ensuring the timely delivery of the information to the Members of the Board of Directors, directly or through the Board of Directors' Secretary is assigned to the Chairperson of the Board of Directors by virtue of Article 13, Number 7 of the Internal Regulations of</p>

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the Board of Directors, which are published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

19.7. The ultimate responsibility for the preparation of the Order of the Day of the Board of Directors meetings lies with the Board of Directors Chairperson and not with the Company CEO, and it shall be structured according to certain parameters that allow following a logical order for the presentation of issues and discussions.

19.7 Measure Is Implemented YES NO N/A

YES. Briefly indicate: Among the duties of the Chairperson of the Board of Directors is that of defining the Order of the Day of the meetings, jointly with the Company CEO, or independently if he or she considers it pertinent. The Order of the Day will be structured according to the parameters that allow following a logical order in the presentation of the topics and the debates. This Recommendation is enshrined in Article 13 Number 2 of the Internal Regulations of the Board of Directors, which is published on the Company's Website and can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

19.8. The Company publishes the attendance of members to the meetings of the Board of Directors and its Committees in the Annual Corporate-Governance Report and on the Corporate Website.

19.8 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Recommendation is enshrined in Article 23 of the Internal Regulations of the Board of Directors. The information corresponding to the attendance of the Board of Directors' members at the meetings during 2022 will be reported in the Annual Corporate-Governance Report, which will comply with the parameters required in the measure and will be presented for approval by the Shareholders' Assembly, at the ordinary meeting to be held in March 2023 and subsequently published on the Company's Website for consultation.

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the Internal Regulations of the Board of Directors is published on the Company's Website and can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva .
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
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19.9. Annually, the Board of Directors evaluates the effectiveness of its work as a Corporate Body, the effectiveness of its Committees and of individual members, including peer evaluation, as well as the reasonableness of its internal rules and the dedication and performance of its members, proposing, if applicable, any modification to its organization and operation deemed pertinent. In the case of Conglomerates, the Parent Company Board of Directors requires the evaluation process to also be carried out in the Boards of Directors of the Subordinated Companies.

19.9 Measure Is Implemented YES **NO** N/A

YES. Briefly indicate: The Recommendation is enshrined in Article 19 of the Internal Regulations of the Board of Directors, which is published on the Company's Website and can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva . The results of the Board of Directors evaluation process are shown in the Annual Corporate-Governance Report, which are presented for approval by the Shareholders' Assembly at its ordinary meeting and subsequently published on the Company's Website for consultation.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

19.10. The Board of Directors alternates the internal self-evaluation technique with the external evaluation carried out by independent advisors.

19.10 Measure Is Implemented YES **NO** N/A

YES. Briefly indicate: The Measure is enshrined in Article 19 of the Internal Regulations of the Board of Directors, which is published on the Company's Website and can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva During the period, the Board of Directors carried out a self-assessment exercise. The results of the evaluation will be included in the Annual

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Corporate-Governance Report, which will be published on the Company's Website once it is approved by the Shareholders' Assembly. The Reports corresponding to previous periods can be consulted at the following link: <https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

Measure No. 20: Duties and Rights of the Board of Director Members

20.1. The Board of Directors Regulations supplement the provisions of the regulatory framework, in relation to the duties and rights of the Board of Director members.

20.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Company has regulated the action framework of the Board of Directors in its Internal Regulations. In Articles 11 and 12, this Regulation establishes the duties and rights of the members of the Board, complementing the regulatory framework applicable to that effect. The aforementioned Regulation can be consulted on the Company's Website at the following link: <https://conconcreto.com/gobierno-corporativo/#id-junta-directiva>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

20.2. The Board of Directors Regulations develop the understanding of the Company regarding the duties of the Board of Director members referred to in Recommendation 20.2.

20.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The duties of diligence, loyalty, non-competition, secrecy and non-use of assets are developed in Article 11 of the Internal Regulations of the Board of Directors, which can be consulted on the Company's Website through the following link: <https://conconcreto.com/gobierno-corporativo/#id-junta-directiva>

NO. Explain:

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N/A. Specify the regulations that prevent adopting the recommendation:
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Implementation Date	12/18/2015
Modification Dates	12/18/2015

20.3. The Board of Directors Regulations develop the content of the **rights of the Board of Director members** referred to in Recommendation 20.3.

20.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The rights to information, to have the help of experts, to remuneration and to permanent induction and training are developed in Article 12 of the Internal Regulations of the Board of Directors, which can be consulted on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

Measure No. 21: Conflicts of Interest

21.1. The Company has a Policy and Procedure defined and formalized in the Internal Regulations **for the knowledge, management and resolution of conflicts of interest**, either directly or indirectly through Related Parties, which may affect the Board of Director members and other Administrators.

21.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Recommendation is enshrined in the Code of Good Corporate Governance in Chapter 5, Number 2, as well as in Chapter 3 of the Code of Ethics and Business Conduct. The Company's Board of Directors approved a Conflict-of-Interest Policy, applicable to all employees of the Organization, which identifies the situations that can potentially generate conflict and how they should be managed. The aforementioned documents are published on the Company's Website at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
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21.2. The Procedure to manage conflicts of interest makes a distinction regarding their nature, differentiating between sporadic or permanent conflicts of interest. If the conflict of interest is sporadic, the applicable procedure will indicate the rules and steps to be followed, which should be relatively easy to manage and difficult to avoid for the affected party. In the case of permanent conflicts of interest, the procedure considers that – if this situation affects all the operations of the Company – it must be understood as a cause for the mandatory resignation of the affected party, since it makes it impossible for him or her to fulfill their duties.

21.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>This Measure is regulated in Article 17 of the Internal Regulations of the Board of Directors and in Chapter 5 Number 2 of the Code of Good Corporate-Governance, differentiating between sporadic or permanent conflicts, and indicating the way to manage each one according to its characteristics. Both the Code of Good Corporate Governance and the Internal Regulations of the Board of Directors are published on the Company's Website and can be consulted at the following links: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas and https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

21.3. The members of the Board of Directors, Legal Representatives, members of Senior Management and other Managers of the Company will periodically inform the Board of Directors of the direct or indirect relationships they hold among themselves, or with other entities or structures belonging to the Conglomerate of which the Issuer is part, or with the Issuer, or with suppliers, or with clients or with any other Stakeholders, from which conflicts of interest may arise or influence the direction of their opinion or vote, thus building a “*Map of Related Parties*” of the Managers.

21.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>There is a duty for which the members of the Board of Directors, Legal Representatives, members of Senior Management and other Administrators of the Company are responsible to periodically inform the Board of Directors of the direct or indirect relations that they maintain among themselves, or with other entities or structures belonging to the Business Group, or with the Company, or with suppliers, or with clients or with any other Stakeholder from which situations of conflict of interest could arise or influence the direction of their opinion or vote. This Recommendation is enshrined in Article 17 of the Internal Regulations of the Board of Directors and in Chapter 5 Number 1 of the Code of Good Corporate Governance, which can be consulted at the following links: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas and https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
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NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
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21.4. The relevant situations of conflicts of interest are considered as those that would force the affected party to refrain from attending a meeting and/or casting a vote in which the members of the Board of Directors and other Managers are and **are included in the public information** published on an annual basis on the Company's Website.

21.4 Measure Is Implemented YES **NO** N/A

YES. Briefly indicate: This is enshrined in Article 42 of the Corporate Bylaws, indicating that situations of relevant conflict of interest shall be reported in the Management Report, understood as those conflicts that would force the affected party to refrain from attending a meeting and/or participating in a vote, where the members of the Board of Directors and other Administrators are. Likewise, as part of the annual Corporate-Governance Report, Recommendation Number 33.3 establishes that information must be provided regarding the attributions of the Board of Directors on operations with Related Parties and "situations of conflicts of interest," a Recommendation that has been implemented by the Company. Both the Management Report and the Corporate-Governance Report are published on the Company's Website, where, if presented, these situations of conflict of interest would be reported.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	03/27/2015

21.5. For these purposes, the definition of Related Party applied by the Company is **consistent with International Accounting Standard Number 24 (IAS 24)**.

21.5 Measure Is Implemented YES **NO** N/A

YES. Briefly indicate: The definition of Related Party corresponds to that indicated in IAS 24 and is enshrined in the Code of Good Corporate Governance in Chapter Six, Number 1, which can be consulted on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:

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N/A. Specify the regulations that prevent adopting the recommendation:
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Implementation Date	12/18/2015
Modification Dates	12/18/2015

Measure No. 22: Operations with Related Parties

22.1. The Company has a policy in place that defines the specific procedure for the assessment, approval and disclosure of operations with Related Parties, including outstanding balances and relationships among them, except for those operations that have a specific regulation.

22.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Chapter Six, Number 2 of the Code of Good Corporate Governance defines the procedure for the assessment, approval and disclosure of operations with Related Parties. The Code of Good Corporate Governance can be consulted on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

22.2. The Company's policy on operations with Related Parties addresses the aspects dealt with in Recommendation 22.2.

22.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The aspects dealt with in this Recommendation are enshrined in Chapter Six, Number 2 of the Code of Good Corporate Governance, which can be consulted on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

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22.3 The Policy stipulates that any recurrent related operations in the ordinary course of business carried out by virtue of adhesion contracts, or general-framework contracts, the conditions of which are perfectly standardized, applied in a massive manner, and carried out at market prices, on general terms by whoever acts as the supplier of the good or service in question, and the individual amount of which is not relevant to the Company, do not require express authorization from the Board of Directors.

22.3 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The aspects dealt with in this Recommendation are enshrined in Chapter Six, Number 2 of the Code of Good Corporate Governance, which can be consulted on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas This provision indicates that those operations that are carried out with Related Parties on a recurring basis are part of the ordinary course of business and are carried out under adhesion contracts or framework contracts will not require the express approval by the Board of Directors. Their conditions are perfectly standardized and are carried out at market prices and their individual amount is not relevant to the Company.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

Measure No. 23: Remuneration of the Members of the Board of Directors

23.1. The Company has a Remuneration Policy for the Board of Directors, approved by the General Shareholders' Assembly and reviewed each year, **which identifies all the remuneration components that can be effectively met.** These components can be fixed or variable. They may include fixed fees for being a member of the Board of Directors, fees for attending the meetings of the Board and/or its Committees and other emoluments of any kind accrued in the course of the year, whatever the cause, in money or in kind, as well as the obligations contracted by the Company in terms of pensions or payment of life-insurance premiums, or other concepts, with respect to both former and current members, as well as those insurance premiums for civil liability (D&O policies) contracted by the Company in favor of the Board of Directors members.

23.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate: This is stipulated in Article 5 Number 19 of the Internal Regulations of the Human Talent Committee. Additionally, the Company has a Remuneration Policy for the Board of Directors approved by the Shareholders' Assembly and which is published on the Company's Website. at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
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Finally, it is the General Shareholders' Assembly that determines the amount of the remuneration of the members of the Board of Directors for each year, as a fixed sum per meeting attended.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

23.2. If the Company implements remuneration systems by recognizing a variable component related to the Company's medium- and long-term sound performance, **the Remuneration Policy shall incorporate limits on the amount** that can be distributed by the Board of Directors and, if the variable component is related to the Company benefits or other management indicators at the end of the period under evaluation, any qualifications contained in the Fiscal Auditor's Report and which could reduce the results of the period must be taken into account.

23.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
NO. Explain: The Company has internally reviewed the option and has considered that it will not adopt variable-remuneration schemes for the time being, in compliance with the Remuneration Policy of the Board of Directors approved by the Shareholders' Assembly, where it is established that their remuneration will correspond to a fixed amount per meeting attended.
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	
Modification Dates	

23.3. The Patrimonial and Independent Members of the Board of Directors are expressly excluded from remuneration systems that incorporate stock options or a variable remuneration linked to the absolute variation of the Share price.

23.3 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
NO. Explain: Variable remuneration has not been considered. The Remuneration Policy of the Board of Directors states that no remuneration components will be established that involve Company Shares or variable-remuneration schemes associated with the value of the Share or the good progress of the Corporate Businesses. This provision covers all members of the Board of Directors, which includes Patrimonial and Independent Members.

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N/A. Specify the regulations that prevent adopting the recommendation:
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Implementation Date	
Modification Dates	

23.4. For each period under evaluation, within the framework of the Remuneration Policy, the General Shareholders' Assembly shall approve the maximum cost of the Board of Directors for all approved remuneration components.

23.4 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The remuneration of the members of the Board of Directors is established as a fixed amount per meeting attended and is determined annually by the Shareholders' Assembly.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/30/2016
Modification Dates	03/30/2016

23.5. The total effective cost of the Board of Directors during the period under evaluation, which includes all the remuneration components paid to the Board of Director members, as well as the reimbursement of expenses, must be made known to the Shareholders and published on the Company's Website, with the level of disaggregation and detail approved by the Board of Directors.

23.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p>
<p>NO. Explain: The remuneration of the members of the Board of Directors is fixed, determined by the Shareholders' Assembly at its ordinary annual meeting.</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	
Modification Dates	

Measure No. 24: The Company CEO and Senior Management

24.1. The Company's Governance Model establishes an effective separation between the Company's Administration or Government (represented by the Board of Directors) and the

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Ordinary Course of Business (the responsibility of Senior Management with the leadership of the Company CEO).

24.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Both the Corporate Bylaws and the Regulations clearly define the field of action and duties of the Board of Directors and Senior Management. Only in the event that the limits determined in the Corporate Bylaws are exceeded does Management request prior authorization from the Board of Directors to carry out a certain operation.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	01/25/2016

24.2. In general, the Board of Directors' Policy consists of delegating the Ordinary Course of Business to the Senior-Management Team, concentrating its activity on the general duties of strategy, supervision, governance and control.

24.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 42 of the Corporate Bylaws establishes that the Board of Directors delegates the ordinary course of business to the Senior-Management Team, concentrating its activity on the general duties of strategy, supervision, government and control. The Company's Corporate Bylaws are published on the Website through the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	03/27/2015

24.3. As a general rule, the members of Senior Management are identified, evaluated and appointed directly by the Company CEO since they are his direct collaborators. Alternatively, **the Company may opt for the members of the Senior Management to be appointed by the Board of Directors at the proposal of the Company CEO.** Regardless of who has made the final designation, the candidates to hold key executive positions in the Company must be known and evaluated by the Board of Directors' Appointment and Remuneration Committee, which must express its opinion.

24.3 Measure Is Implemented YES NO N/A

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<p>YES. Briefly indicate:</p> <p>Article 48 Point g of the Corporate Bylaws indicates as an attribution of the CEO to create the jobs that he deems necessary for the good service of the Company and to determine their duties. Although the appointment is made by the CEO, the candidates to occupy key Company Executive positions must be known and evaluated by the Board of Directors' Human Talent Committee, which must issue its opinion. The Company's Bylaws are published on the Website and can be consulted through the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	03/27/2015

24.4. The Company has a clear policy in place to delegate duties approved by the Board of Directors and/or a scheme of powers that allows knowing the level of empowerment of the Company CEO and of the other members of Senior Management.

24.4 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Both the Bylaws and the Regulations state that the Board of Directors is the Company's Administrative Body and that, based on the provisions of Article 42 of the Bylaws, it delegates the administration of the ordinary course of business in Senior Management.</p> <p>Such delegation is not unlimited in nature, but is demarcated by a series of amounts up to which the members of Senior Management who are Legal Representatives of the Company may execute and approve operations in development of the Company's Corporate Purpose. Therefore, in the event that this limit may be exceeded, the prior authorization of the Board of Directors must be requested to approve this type of operation.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	01/25/2016

24.5. The Board of Directors, through the Appointment and Remuneration Committee, or whoever performs its duties, **evaluates the performance of the Company CEO on an annual basis** and is aware of the evaluations of the other members of Senior Management.

24.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p>

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Among the duties of the Human Talent Committee is to annually lead the evaluation of the performance of the Company CEO and to know the evaluations of the other members of Senior Management. Article 5 Number 6 of the Internal Regulations of the Human Talent Committee regulates this Recommendation, and is published on the Company's Website at: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

24.6. The Company has a Remuneration Policy in place for the Company CEO and for the other members of Senior Management, approved by the Board of Directors, which identifies all the remuneration components that can be effectively met, related to the fulfillment of long-term objectives and risk levels.

24.6 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company has a Remuneration Policy for Senior Management that includes the Recommendation that this measure deals with. This Policy is published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/12/2018
Modification Dates	

24.7. If the Company CEO's remuneration includes a fixed component and a variable component, its technical design and calculation method prevents the variable component from exceeding the maximum limit established by the Board of Directors.

24.7 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
NO. Explain: The Company has a Remuneration Policy for Senior Management in which it is stated that no remuneration components shall be established that involve Company Shares or variable-remuneration schemes associated with the value of the Share or the good progress of the Corporate Businesses. The Senior-Management Remuneration Policy is published

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on the Company's Website and can be consulted through the following link:
<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

N/A. Specify the regulations that prevent adopting the recommendation:

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IV. CONTROL ARCHITECTURE

Measure No. 25: Control Environment

25.1. The Board of Directors is ultimately responsible for the existence of a solid control environment within the Company, suitable to its nature, size, complexity and risks, and it must meet the conditions indicated in Recommendation 25.1.

25.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Article 42 Number 53 of the Corporate Bylaws indicates that the Board of Directors is ultimately responsible for the existence of a solid control environment within the Company, adapted to its nature, size, complexity and risks, so that: I. A Risk and Control Culture is promoted throughout the Company, which reaches the entire Organization; II. Roles and responsibilities are defined around Risk Management, Internal Control, and Evaluation, with clearly established reporting lines; III. The risks that derive from the Company's strategic definition and of the business processes are considered in order to adequately monitor, evaluate and manage them. Additionally, the Audit Committee periodically reviews the Company's risks and manages the action plans against them. The detailed information on the activities carried out by the Board of Directors' Audit Committee is reported to Shareholders in the Annual Corporate-Governance Report, which is presented at the Ordinary Meeting of the Shareholders' Assembly and is subsequently published on the Company's Website for consultation. In this Report, a chapter is devoted to the Organization's Risk-Management Report during the period. The Corporate Bylaws and other documents mentioned are published on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	03/27/2015

25.2. In the case of Conglomerates, the Parent Company Board of Directors will strive for the existence of a Control Architecture with a consolidated, formal scope that includes all the Subordinated Companies, establishing responsibilities with respect to the policies and guidelines on this matter at the Conglomerate level and defining clear reporting lines that allow having a consolidated view of the risks to which the Conglomerate is exposed and the taking of control measures.

25.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Company has a Comprehensive Risk-Management Policy, which has a scope at the Conglomerate level, where the roles and responsibilities are defined regarding the comprehensive management of the Organization's risks. This Policy is published on the Company's website through the</p>

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following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	02/18/2019
Modification Dates	02/18/2019

Measure No. 26: Risk Management

26.1. In the Company, the **Risk-Management Objectives** are those contemplated in Recommendation 26.1.

26.1 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company has a Comprehensive Risk-Management Policy in which the objectives enshrined in the measure for the management of the Organization's risks are expressly established. This Policy is published on the Company's Website at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	02/18/2019
Modification Dates	02/18/2019

26.2. The Company has a Risk Map, understood as a tool to identify and monitor financial and non-financial risks to which it is exposed.

26.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Company has a Strategic Risk Map. Likewise, the occurrence of specific events or the appearance of alerts within the period is reviewed Quarterly with each business area in order to disclose this information to the Audit Committee and, if applicable, take the pertinent management and mitigation measures.
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	04/01/2008
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Modification Dates	11/01/2016
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26.3. The Board of Directors is responsible for defining a Risk-Management Policy, as well as for setting the maximum exposure limits for each risk identified.

26.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Through its Audit Committee, the Board of Directors defines the exposure limits regarding identified risks, which will vary depending on the dynamics of the business, as well as determining action measures to manage the identified risks. It also includes previously unidentified risks which enter the Matrix and are permanently monitored. The foregoing is regulated in Article 42 Number 28 of the Corporate Bylaws, which can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/27/2015
Modification Dates	03/27/2015

26.4. The Board of Directors is aware of and periodically supervises the effective exposure of the Company to the maximum risk limits defined, and proposes corrective actions and follow-up measures in case of deviations.

26.4 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: This is regulated in Article 42 Number 29 of the Corporate Bylaws, which establishes that one of the duties of the Board of Directors is to know and periodically supervise the effective exposure of the Company to the maximum risk limits defined, and to propose corrective and follow-up actions in case of deviations. The Company's Corporate Bylaws are published on the Company's Website through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p> <p>Likewise, reports on the Company's risks are presented to the Board of Directors Quarterly, through the Audit Committee. The Audit Committee analyzes the most relevant facts and issues guidelines for managing the identified risks.</p> <p>In the Company, the maximum limits of defined risks are evaluated through relative scales of probability and impact and this allows the establishment of mitigation or transfer mechanisms.</p> <p>The Company evaluates the criticality of the risks identified through the relative probability of occurrence and the corresponding impact on the objectives of the projects if the risks were to arise. For this analysis, the relative scale of probability and impact must be taken into account.</p>

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All the information related to the risks that arise in the processes and projects is consolidated by the Risk Management Area in an Executive Report. This information is reviewed and evaluated Quarterly by the Executive Committee, the body in charge of approving this report, which is finally presented to the Audit Committee.
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NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	10/28/2016

26.5. Within the framework of the Risk-Management Policy, **Senior Management is the owner of the processes and is responsible for the management of risks**; i.e. for identifying, assessing, measuring, controlling, monitoring and reporting risks, defining methodologies and ensuring that risk-management activities are consistent with the strategy, the Risk Policy defined and the maximum limits approved.

26.5 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

Within the chapter entitled "Roles and Responsibilities in Comprehensive Risk Management," the Comprehensive Risk-Management Policy contemplates the generality of the functions of each of the areas involved in the management of the Company's risks. This chapter establishes that: (i) the Comprehensive Risk-Management Department is the area in charge of monitoring, administering and managing risks. This process includes the stages of context, identification, analysis, Response Plan, monitoring and evaluation, and risk communication. It is important to clarify that the functions of the Comprehensive Risk-Management Department are currently headed by the Company's Secretary General, as it is an area that is an integral part of the Company's Senior Management; and (ii) Senior Management is responsible for the communication and preparation of action plans around the evidenced facts. The Comprehensive Risk-Management Policy can be consulted on the Company's website, through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	09/13/2019
Modification Dates	09/13/2019

26.6. **The Company has a Risk-Delegation Policy in place**, approved by the Board of Directors, which establishes the risk limits that can be directly managed by each level in the Company.

26.6 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

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In the governing framework and scope of the Company's Risk-Management Policy, measures are established regarding implementation and the actors involved, determining its scope at the level of the Conglomerate, dependencies and levels within the Organization, as well as promoting a risk culture that binds all employees through prevention and self-control as the main risk-management mechanism. This Policy is published on the Company's Website at the link:

<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

Additionally, the Company's Board of Directors approved a Comprehensive Risk-Management Methodology, in which a matrix was established where the roles and responsibilities of the areas that will be involved in the Company's Risk Management are defined.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	02/18/2019
Modification Dates	02/18/2019

26.7. In Conglomerates, risk-management activities must be carried out at a consolidated level so as to contribute to the consistency and control of the companies that comprise it.

26.7 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Company has a Comprehensive Risk-Management Policy that it applies at the Conglomerate level, complying with the parameters required in the measure. The aforementioned Policy is published on the Company's Website and can be consulted through the following link:
<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	02/18/2019
Modification Dates	02/18/2019

26.8. If the Company has a complex and diverse business and operational structure, there must be a Chief Risk Officer (CRO) with competence at the Conglomerate level in the case of the companies integrated in control and/or business-group situations.

26.8 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

NO. Explain:

For the period evaluated, the Company did not have the position of the Risk Manager (Chief Risk Officer, CRO). Notwithstanding the foregoing,

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the Company has a Comprehensive Risk-Management Area led by the Company's Secretary General, who performs these duties, and is in charge of managing the Company's risks with a consolidated scope, having within its duties: **(i)** To participate in the planning and organization of the measurement and evaluation activities of the Company's Internal-Control System; and **(ii)** To permanently monitor the Company's risks and include Risk Management as a strategy to ensure compliance with the Organization's objectives.

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	
Modification Dates	

Measure No. 27: Control Activities

27.1. The Board of Directors is responsible for ensuring the existence of an adequate Internal-Control System, suitable to the Company and its complexity, and consistent with the Risk-Management Policy in force.

27.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>One of the duties of the Board of Directors is to ensure the existence of an adequate Internal-Control System, adapted to the Company and its complexity, and consistent with the risk management in force.</p> <p>This duty is regulated in Article 42 Number 30 of the Corporate Bylaws, which are published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/27/2015
Modification Dates	03/27/2015

27.2. The Board of Directors is responsible for supervising the effectiveness and adequacy of the Internal-Control System, which may be delegated to the Audit Committee, without the Board losing its supervisory responsibility.

27.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>Supervision of the effectiveness and adequacy of the Internal-Control System is one of the functions of the Audit Committee and in its meetings, this system and the risks that arise during each Quarter are monitored. In the meetings of the Board of Directors, the most relevant risks and those with the greatest impact for the Company are evaluated and, annually, in the Corporate-Governance Report that it presents to</p>
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<p>the Shareholders' Assembly, a chapter referring to the Risk-Management Systems of the Company, in which a presentation is made on the most relevant risks that arose during the period and the way in which the Risk-Management and Internal-Control System was implemented. The Corporate Governance Report and the Internal Regulations of the Audit Committee can be consulted on the Company's website through the following links: https://conconcreto.com/gobierno-corporato/#id-centro-descargas and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

27.3. The principle of self-control is applied and required in the Company; it is understood as the *“ability of the people who participate in various processes to consider control as an inherent part of their responsibilities, fields of action and decision-making.”*

27.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Company has a Comprehensive Risk-Management Policy, where the principle of self-control is enshrined in the terms indicated in this Recommendation. This policy is published on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	02/18/2019
Modification Dates	02/18/2019

Measure No. 28: Information and Communication

28.1. In the Company, the culture, philosophy and Risk Policies are communicated downwards and horizontally, as well as the exposure limits approved, for the Organization as a whole to consider risks and control activities in its activities.

28.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Company has a Comprehensive Risk-Management Policy, which includes the guidelines on control and communication. This Policy is accessible to all members of the Organization and the Administration provides the disclosure mechanisms at all levels of the Company.</p>

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Additionally, as part of the Risk-Management Cycle, there are treatment strategies and systematic monitoring of Area- and Project-Risk Matrices.

The Company's Comprehensive Risk-Management Policy can be consulted on the Company's website through the following link:

<https://conconcreto.com/gobierno-corporativo/#id-centro-descargas>

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	02/18/2019
Modification Dates	02/18/2019

28.2. In the Company, **there is an upwards reporting mechanism** (toward the Board of Directors and Senior Management), which is truthful, comprehensible and complete, and supports and allows informed decision making and the management and control of risks.

28.2 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

The Risk Area maintains constant communication with the areas, guaranteeing the report of findings in a timely, clear manner.

Information on the Company's risks is compiled by the Risk-Management Area, which – in turn – transfers it to the Executive Committee for analysis. The objective of this Committee is the detailed review of the Company's Separate and Consolidated Quarterly Financial Statements, including the results by segments and of each one of the companies that make up the Organization's consolidated situation, analyzing the main variations of the Quarter compared to the year and against the figures budgeted for that period. Likewise, for this Committee, a recapitulation of all the risks detected in the period and their respective Action and Mitigation Plans is made, with the aim of determining those that are most relevant and that are directly related to the strategic risks defined by the Company in its Risk Matrix. As a result of this analysis, the base report is generated for the preparation of the Audit Committee and the Board of Directors.

NO. Explain:

N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	04/01/2008
Modification Dates	10/28/2016

28.3. The Company's **communication- and information-reporting mechanism** allows: (i) Senior Management to involve the entire Company, highlighting its responsibility for Risk Management and the definition of controls; (ii) the Company staff to understand their role in Risk Management and in the identification of controls, as well as their individual contribution in relation to the work of others.

28.3 Measure Is Implemented YES NO N/A

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<p>YES. Briefly indicate: The Company has a Comprehensive Risk-Management Policy to which all employees of the Organization have access; it includes the roles and responsibilities of Senior Management and, in general, of the different Company Bodies with respect to the comprehensive management of risks, allowing the purposes indicated in this Recommendation to be fulfilled. This Policy is published on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	02/18/2019
Modification Dates	02/18/2019

28.4. There are internal anonymous whistleblower lines that allow employees to anonymously report any illegal or unethical behavior that may contravene the Company's Risk-Management and Control Culture. A report on such complaints is known by the Company's Board of Directors.

28.4 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Company has an Ethics Line through which anonymous complaints can be made. Annually, the Board of Directors is in charge of preparing and approving a Management Report, in conjunction with Management, to be presented for consideration by the General Shareholders' Assembly at its regular meeting. In this report, Shareholders and the general public are informed of the complaints received throughout the year through the Ethics Line.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	09/20/2008
Modification Dates	09/20/2008

Measure No. 29: Monitoring the Control Architecture

29.1. In the Company, the Board of Directors, through the Audit Committee, is responsible for supervising the effectiveness of the various components of the Control Architecture.

29.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: This Recommendation is enshrined in Article 5 of the Internal Regulations of the Audit Committee, which is published on the</p>

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Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

29.2. In the Company, the **monitoring work aimed at providing assurance about the effectiveness of the Control Architecture** mainly involves the **internal audit in collaboration with the Fiscal Auditor** in matters within its competence and in particular regarding the financial information produced by the Company.

29.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p> <p>This Recommendation is complied with by the Company, and is reflected in the periodic meetings held on the Company's risks by the Company's Risk Area, in preparation for the meetings of the Audit Committee, where they are presented and the Action Plans to mitigate them are defined, and in which the Fiscal Auditor attends.</p> <p>Additionally, the Company defined that at least one annual cycle of internal audits is carried out that covers the processes and requirements of the NTC-ISO-9001, NTC-ISO14001, NTC-ISO45001 standards.</p> <p>The accounting processes are permanently audited by the Fiscal Auditor, and the Administrative-Financial processes in the cycle established in the Audit Program by internal auditors for specific legal and regulatory issues.</p> <p>Likewise, the Company's Fiscal Auditor carries out constant audit tasks regarding the issues that are within its competence and the conclusions of this activity are presented by the Fiscal Auditor in the meetings of the Audit Committee and in the opinions to the Financial Statements of each Quarter.</p>
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	10/01/2006
Modification Dates	10/28/2016

29.3. The Company's **Internal-Audit function has an Internal-Audit Code**, approved by the Audit Committee, which expressly includes the scope of its duties in this area and must include the topics indicated in Recommendation 29.3.

29.3 Measure Is Implemented YES NO N/A

YES. Briefly indicate:

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<p>The Company has an Internal-Audit Statute, which has the approval of the Board of Directors and the members of the Audit Committee, and which includes as its duties: (i) The autonomy and independence necessary to exercise their duties; (ii) The work of evaluating and assuring Risk-Management processes; (iii) Evaluating and assuring that the risks are being correctly evaluated; (iv) Evaluating reporting mechanisms for key business risks; and (v) Reviewing the management of key risks by those responsible.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/11/2020
Modification Dates	12/13/2020

29.4. The Head of Internal Audit maintains a professional relationship of independence with respect to Senior Management of the Company or Conglomerate that has hired him/her, through the exclusive functional dependency of the Audit Committee.

29.4 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate:</p>
<p>NO. Explain: The Company has a Risk and Insurance Area, who are Company employees, who functionally report to the Secretary General, and who, in his /her capacity as Compliance Agent, reports directly to the Audit Committee of the Board of Directors and to the full Board of Directors.</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	
Modification Dates	

29.5. In the Company, the appointment and removal of the person responsible for Internal Audit is a responsibility of the Board of Directors, at the proposal of the Audit Committee, and his/her removal or resignation is communicated to the market.

29.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Recommendation is enshrined in Article 20 Number 26 of the Internal Regulations of the Board of Directors, as well as in Article 10 Number 26 of the Internal Regulations of the Audit Committee, which established – as one of the duties of the Audit Committee – to propose to the Board of Directors the selection, appointment, remuneration, re-election and dismissal of the head of the Internal-Audit Service. These documents are published on the Company's Website and can be consulted at the following links: https://conconcreto.com/gobierno-corporativo/#id-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva</p>

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NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	12/18/2015
Modification Dates	12/18/2015

29.6. The Fiscal Auditor of the Company or Conglomerate maintains a clear independence with respect to them, a capacity that must be declared in the respective Audit Report.

29.6 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Recommendation is enshrined in Article 20 of the Corporate Bylaws, which indicates that the Fiscal Auditor and his Alternate shall be public accountants, may not enter into any contract with the Company and shall be subject to the other incompatibilities, inabilities, prohibitions and liability that the Laws establish. Likewise, the Fiscal Auditor declares the condition of independence in the opinion that he presents annually to the Shareholders within the framework of the ordinary meeting of the Shareholders' Assembly. The Company's Corporate Bylaws can be consulted at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/28/2003
Modification Dates	03/27/2015

29.7. If the Company acts as the Parent Company of a Conglomerate, the Fiscal Auditor shall be the same for all companies, including offshore companies.

29.7 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Fiscal-Auditing Firm is the same for the companies of the Group that are obliged to have it, at the national level. The foregoing is expressly enshrined in Article 4 Number 1 of the Fiscal-Auditor Appointment Policy, which can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

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Implementation Date	03/31/2006
Modification Dates	03/27/2015

29.8. The Company has a policy to appoint the Fiscal Auditor, approved by the Board of Directors and disclosed among the Shareholders, which includes the provisions established in Recommendation 29.8.

29.8 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The policy to appoint the Fiscal Auditor approved by the General Shareholders' Assembly complies with the parameters required in the measure and is published on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/30/2016
Modification Dates	03/30/2016

29.9. In order to avoid excessive hires between the Company and the Fiscal Auditor and/or its departments and maintain its independence, the Company has established a maximum period of employment that ranges between five (5) and ten (10) years. In the case of the Fiscal Auditor, a natural person not engaged in a firm, the maximum period of employment is five (5) years.

29.9 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The policy for the appointment of the Fiscal Auditor approved by the General Shareholders' Assembly complies with the parameters required in the measure. Article 4 Number 2 of the aforementioned Policy establishes that, in order to avoid excessive ties between the Company and the Fiscal-Auditing firm and/or its teams and maintain its independence, the Company establishes a maximum period of contract of ten (10) years. In the case of the Fiscal Auditor, a natural person not linked to a firm, the maximum contract period shall be five (5) years. The Policy is published on the Company's Website and can be consulted at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/30/2016
Modification Dates	03/30/2016

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29.10. Within the maximum period of employment, the Company **promotes the rotation of the partner of the Fiscal-Auditing Firm assigned to the Company** and its work teams in the middle of the period, upon completion of which the firm must necessarily be replaced.

29.10 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The policy to appoint the Fiscal Auditor approved by the General Shareholders' Assembly complies with the parameters required in the measure. Article 4 Number 3 of the aforementioned Policy establishes that, within the maximum contracting period, the Company shall promote the rotation of the partner of the Fiscal-Auditing Firm assigned to the Company and its work teams in the middle of the period, at the end of which the rotation of the firm must take place. The Policy is published on the Company's Website at the link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/30/2016
Modification Dates	03/30/2016

29.11. In addition to the current prohibition against hiring professional **services with the Fiscal Auditor** other than those regarding the financial audit and other duties recognized in the regulations in force, the Company extends this limitation to the natural persons or legal entities related to the Fiscal Auditor, which include the companies of its group, as well as companies in which there is a broad coincidence of its partners and/or managers with those of the Fiscal Auditor.

29.11 Measure Is Implemented YES NO N/A

YES. Briefly indicate: The Policy to appoint the Fiscal Auditor approved by the General Shareholders' Assembly complies with the parameters required in the measure, by establishing in Article 4 Number 4 that – in addition to the current prohibition of not contracting professional services with the Fiscal Auditor other than those of the financial audit itself and other duties recognized in current regulations – the Company extends this limitation to persons or entities linked to the Fiscal-Auditing Firm, including the companies of its group, as well as the companies in which there is a broad coincidence of its partners and/or administrators with those of the Fiscal-Auditing Firm. The aforementioned Policy is published on the Company's Website at the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas
NO. Explain:
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	03/30/2016
Modification Dates	03/30/2016

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29.12. In its public information, **the Company discloses the total amount of the contract with the Fiscal Auditor** as well as the proportion represented by the fees paid by the Company in respect to the total income of the firm in relation to its fiscal-auditing activities.

29.12 Measure Is Implemented YES NO N/A

YES. Briefly indicate:
NO. Explain: At the ordinary meeting of the Shareholders' Assembly where the Fiscal Auditor is elected, the Company discloses to Shareholders the amount of its fees. There is no information available to verify the percentage that these represent in the firm's income.
N/A. Specify the regulations that prevent adopting the recommendation:

Implementation Date	
Modification Dates	

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TRANSPARENCY AND FINANCIAL AND NON-FINANCIAL INFORMATION

Measure No. 30: Information-Disclosure Policy

30.1. The Board of Directors has approved an Information-Disclosure Policy, which identifies, at a minimum, the information addressed in the Recommendation.

30.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Board of Directors has approved an Information-Disclosure Policy, which includes the points dealt with in this Recommendation. The policy is published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

30.2. In the case of Conglomerates, the information disclosure to third parties is integral and transversal, in respect of the group of companies, which allows external third parties to have a well-founded opinion about the reality, organization, complexity, activity, size and governance model of the Conglomerate.

30.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: This is regulated in Article 7 of the Information-Disclosure Policy, which establishes that, taking into account that the Company is part of a Business Group, the disclosure of information to third parties will be done in a comprehensive, transversal manner, allowing investors to form a well-founded opinion on the reality, organization, complexity, activity, size and governance model of the Business Group. The Information-Disclosure Policy is published on the Company's Website and can be consulted through the following link: https://conconcreto.com/gobierno-corporativo/#id-centro-descargas</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

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Measure No. 31: Financial Statements

31.1. If there are caveats in the Fiscal Auditor’s Report, these and the actions proposed by the Company to resolve the situation will be subject **to the Shareholders** gathered in the General Assembly, by the Audit Committee Chairperson.

31.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: This is regulated in Article 10 Number 35 of the Internal Regulations of the Audit Committee. Likewise, it is enshrined in Article 20 Number 35 of the Internal Regulations of the Board of Directors,. It is reported that – as of the date of this report – there was no news of exceptions in the opinions of the Fiscal Auditor. The aforementioned documents are published on the Company's Website and can be consulted through the following links: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

31.2. Upon the caveats and/or paragraphs of emphasis of the Fiscal Auditor, the Board of Directors considers that it must maintain its criterion; this position is **adequately explained and justified by means of a written report to the General Assembly**, specifying the content and scope of the discrepancy.

31.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Recommendation is enshrined in Article 10 Number 36 of the Internal Regulations of the Audit Committee, and in Article 20 Number 35 of the Internal Regulations of the Board of Directors. Likewise, it is regulated in Article 10 Number 35 of the Internal Regulations of the Audit Committee, and in Article 20 Number 35 of the Internal Regulations of Board of Directors. As of the date of this report, there was no notice of caveats in the opinions of the Fiscal Auditor, and regarding the paragraphs of emphasis, the Board of Directors has made no pronouncement regarding maintaining its criterion. The aforementioned documents are published on the Company's Website and can be consulted through the following links: https://conconcreto.com/gobierno-corporativo/#id-comites-de-la-junta-directiva and https://conconcreto.com/gobierno-corporativo/#id-junta-directiva</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

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Implementation Date	12/18/2015
Modification Dates	12/18/2015

31.3 Operations with or between Related Parties, including operations between Conglomerate companies that, by means of objective parameters – such as operation volume, percentage of assets, sales or other indicators, are classified as material by the Company – **are included in detail in the public-financial information, as well as the mention of conducting off-shore operations.**

31.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Operations between Related Parties are reported in the Notes to the Year-End Financial Statements, as well as in the Management Report that is presented to Shareholders at the ordinary meeting of the General Shareholders' Assembly.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/31/2011
Modification Dates	03/30/2016

Measure No. 32: Information to the Markets

32.1. Within the framework of the Information-Disclosure Policy, the Board of Directors (or the Audit Committee) **shall adopt the necessary measures to ensure that all the Company's financial and non-financial information** required by the laws in force is transmitted to the financial and Capital markets, in addition to all matters deemed relevant for investors and clients.

32.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: This is regulated in Article 8 of the Information-Disclosure Policy. Likewise, the Company has a Corporate Legal Area, which – together with the Investor Relations Area – is responsible for making reports to the market in a timely, sufficient manner.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/18/2015
Modification Dates	12/18/2015

32.2. The Company's Website is organized in a user-friendly manner, so that it is easy for the user to access the information related to Corporate Governance.

32.2 Measure Is Implemented YES NO N/A

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<p>YES. Briefly indicate: This information can be found at the link entitled Investors, on the Company's Website, which includes a microsite entitled Corporate Governance, where Investors can find the policies implemented by the Company in this matter and other information regarding the Company's governance. This microsite can be accessed through the following link: https://conconcreto.com/gobierno-corporativo/</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/01/2010
Modification Dates	12/15/2016

32.3. The Company's Website includes, at least, the links addressed in Recommendation 32.3.

32.3 Measure Is Implemented YES **NO** **N/A**

<p>YES. Briefly indicate: The Company's Website includes the links referred to in this Recommendation.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/01/2010
Modification Dates	12/15/2016

32.4. The supports used by Company in general to communicate information to the market are documents that can be printed, downloaded and shared.

32.4 Measure Is Implemented YES **N/A**

<p>YES. Briefly indicate: The documents supporting the information to the markets can be accessed through the Company's Website, where they can be downloaded and printed.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	12/01/2010
Modification Dates	12/15/2016

32.5. If the Company is a large and complex company, it must publish an explanatory report on an annual basis on its Website on the organization, methods and procedures of the

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Control Architecture implemented to provide correct, safe financial and non-financial information, safeguarding the assets of the entity and the efficiency and security of its operations. The information on the Control Architecture is supplemented by a Risk-Management Report.

32.5 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: Within the Annual Corporate-Governance Report, one of its parts includes a Risk-Management Report that complies with the parameters required in this Recommendation, where information on the operation of the Company's Control Architecture is set out. This report is published on the Company's Website.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/30/2016
Modification Dates	03/30/2016

Measure No. 33: The Annual Corporate-Governance Report

33.1. Annually, the Company prepares a Corporate-Governance Report, the contents of which the Board of Directors is responsible, after being reviewed and favorably determined by the Audit Committee, which must be submitted together with the rest of year-end documents.

33.1 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Annual Corporate-Governance Report is presented at the ordinary meeting of the General Shareholders' Assembly and complies with the parameters required in the measure, which is published on the Company's Website. To this end, at the meeting of the Audit Committee and the Board of Directors in preparation for the ordinary meeting of the Shareholders' Assembly, the Report is approved and will be put to the consideration of the Shareholders at this meeting. For the year 2022, this Report will be presented for consideration by the General Shareholders' Assembly at the ordinary meeting to be held in March 2023.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/30/2016
Modification Dates	03/30/2016

33.2. The Company's Annual Corporate-Governance Report is not a mere transcription of the Corporate-Governance rules included in the Corporate Bylaws, internal regulations, Corporate-Governance Codes or other Corporate documents. It is not intended to describe the Company's governance model, but to explain the reality of its operation and any relevant changes during the year.

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33.2 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Annual Corporate-Governance Report is presented at the ordinary meeting of the General Shareholders' Assembly and complies with the parameters required in the measure, explaining in reality the operation of the Company's Governance Model and the relevant changes that occurred during the period. For the year 2022, this Report will be presented for consideration by the General Shareholders' Assembly at the ordinary meeting to be held in March 2023 and will be published later on the Company's Website.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/30/2016
Modification Dates	03/30/2016

33.3. The Company's Annual Corporate-Governance Report contains year-end information that **describes the manner in which the Corporate Governance recommendations implemented by the Company and the main changes that took place were fulfilled during the year.**

The structure of the Company's Annual Corporate-Governance Report is consistent with the scheme contemplated in Recommendation 33.3.

33.3 Measure Is Implemented YES NO N/A

<p>YES. Briefly indicate: The Annual Corporate-Governance Report is presented at the ordinary meeting of the General Shareholders' Assembly and complies with the parameters required in the measure, describing the manner in which the Company complied with the Corporate-Governance Recommendations adopted by the Company, as well as the main changes presented during the year. For the year 2022, this Report will be presented for consideration by the General Shareholders' Assembly at the ordinary meeting to be held in March 2023 and will be published later on the Company's Website.</p>
<p>NO. Explain:</p>
<p>N/A. Specify the regulations that prevent adopting the recommendation:</p>

Implementation Date	03/30/2016
Modification Dates	03/30/2016