

Corporate Governance Code

Corporate



PRESENTATION

At Constructora Concreto, we are committed to contributing to the construction of a better country through uplifting, honest, and transparent actions that identify all members of the organization. To this end, we have compiled a set of precepts that serve as a guide and framework for action, which we refer to as the "Code of Good Corporate Governance."

More than a compilation of rules and duties, it is a manual for ethical conduct that brings together the philosophy and principles of behavior that should inspire our actions both internally and with customers, suppliers, the community, and the general public.

It is up to all of us to understand it, assimilate it, disseminate it, and demand strict compliance with it.

In adopting this code, we believe that we are actively and decisively participating in the construction of an ethical and political business culture, which undoubtedly constitutes an intangible asset capable of generating long-term returns that materialize in a socio-cultural environment observable by all those audiences that guarantee the permanence of Constructora Constructora in the business world.

JUAN LUIS ARISTIZABAL VELEZ
President

CHAPTER ONE GENERAL PROVISIONS

1. PURPOSE OF THE CODE

The objective of this Code is to disclose the governance, conduct, and information mechanisms of Constructora Concreto in order to ensure the confidence of shareholders and investors in the management of the Company. To this end, the Code of Good Corporate Governance will be kept up to date on the company's website: www.concreto.com.

2. SCOPE OF APPLICATION

All actions of administrators, directors, officers, employees, contractors, customers, suppliers, and shareholders must be within the provisions of this Code, which integrates the principles, values, and practices based on which the Company preserves business ethics, manages its affairs, recognizes and respects the rights of shareholders and investors, ensures the transparency of its management, and discloses information relating to the business that should be known to shareholders, investors, and the general public.

CHAPTER TWO GENERAL IDENTIFICATION OF THE COMPANY AND CORPORATE FRAMEWORK

1. NATURE OF THE COMPANY

Constructora Concreto is a commercial corporation of the anonymous type, incorporated by Public Deed No. 8597 of the 4th Notary Public of Medellín, granted on December 26, 1961, and amended by subsequent instruments. Its principal place of business is in the Municipality of Medellín, with a branch office in the city of Bogotá D.C.

2. CORPORATE PURPOSE

The corporate purpose of Constructora Concreto includes:

- a. The study, design, planning, contracting, and execution of all types of buildings, civil works, and real estate in general, as well as the completion of additions, improvements, modifications, and repairs thereto.
 - b. The provision of technical and consulting services in various fields of civil engineering.
 - c. The performance of work, studies, consulting, and projects in the field of urban planning and architecture.
 - d. The acquisition of real estate to carry out construction, either directly or through third parties, through its urbanization, programming, promotion, sale of lots or housing units, or commercial or industrial premises resulting from the construction.
 - e. The development of constructions, subdivisions, or urban developments on its own or third-party property, whether for housing plans, commercial, or industrial premises.
 - f. The promotion, incorporation, and association of companies or partnerships whose purpose is the construction of real estate or real estate businesses.
 - g. Investments in real estate for sale or to develop building projects, with the company being authorized to reserve for itself or for its partners the areas it deems appropriate for leasing or commercial exploitation.
 - h. The execution of all types of business, in addition to the sale and purchase related to the marketing of real estate, such as: financing, leasing, trusts, administration, usufruct, incorporation and condominium regime, etc.
 - i. The construction of external and underground pipelines for the extension and distribution of energy networks, telephones, aqueducts, and sewers, and in general, everything related to public services.
 - j. Electromechanical assemblies of power generation plants,
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hydraulic, thermal, gas, etc.

- k. Pressure pipe assemblies for power plants and/or pumping stations.
 - l. Electromechanical assemblies for industrial, commercial, or infrastructure plants or facilities.
 - m. The construction of works and infrastructure for the oil sector, including the construction of oil pipelines, multi-product pipelines, gas pipelines, well platforms, pumping stations, etc.
 - n. The construction of structures for buildings, bridges, and infrastructure in general, using concrete or metal.
 - o. The sale of new construction materials and construction leftovers.
 - p. Participation in civil or commercial partnerships, joint ventures, and other associations, even when their corporate purpose is not related to that described in this clause.
 - q. The acquisition for consideration of equipment, machinery, facilities, accessories, and auxiliary implements used in the construction of works and buildings, for the purpose of using them in the works it executes, and it may also lease them or enter into any type of transaction with them.
 - r. The company may provide residential public services, information and communications technology (ICT) services, and complementary or related activities, as well as being a partner in private or mixed public service companies and/or participating in any type of association such as temporary unions or consortia and, in general, associating with third parties for the creation or not of new legal entities or to participate in existing ones whose purpose is to provide the services or activities listed, including participation in promises of future companies.
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- s. The purchase, construction, administration, and operation of real estate assets, such as hotels, mini-warehouses, shopping centers, distribution centers, convenience stores, offices, and warehouses, as well as the performance of any other legal act related to such real estate assets.
- t. The disposal, for any reason, of securities, such as shares, quotas, titles, participations, commercial papers, and, in general, assets through which the company makes investments aimed at safeguarding and increasing its corporate assets.
- u. The acquisition, production, transformation, distribution, and, in general, trade of materials, accessories, tools, and implements of various kinds used in the construction industry.

3. COMPANY PROFILE

Concreto Construction Company is supported by important companies and individuals specializing in the areas of construction, engineering, architecture, and technological infrastructure. It has the financial, technical, and human resources to carry out the projects it undertakes and is structured to compete efficiently in the globalization process.

It also promotes temporary partnerships, such as consortia and temporary unions, to access large infrastructure projects, both in Colombia and abroad.

4. MISSION

Constructora Concreto is a service company dedicated to the development of building and infrastructure projects to transform the physical environment, generating progress for the balanced benefit of the community, shareholders, customers, employees, and suppliers.

5. VISION

To serve, valuing our differences and contributing our qualities to be a leading, innovative, and sustainable organization, providing well-being and

quality of life.

6. VALUES

Following the deployment of Constructora Concreto's slogans "We build a future with a human touch" and "Progress for Colombia" generates a commitment to action based on principles and values. These institutional values are made known and explained in the induction process for each and every employee and are the main reference point for the ethics of Constructora Concreto's staff. As for beliefs, they inspire us to work with quality for our clients, our families, our community, and Colombia. Constructora Concreto's beliefs are as follows:

- Integrity, consistency, and commitment in all our actions.
- Comprehensive human development of our employees.
- Safe, healthy, and harmonious workplaces.
- Respect for the sustainable development of the ecosystem.
- Quality, continuous improvement, agility, and reliability in all our services.
- Individualized attention to our customers.
- Organization of teamwork in process management.
- Opportunity and responsibility in decision-making.
- Sincere and direct treatment.
- Practicing beliefs with strength and perseverance.

7. BUSINESS ETHICS MANUAL

Constructora Concreto also has a business ethics manual, which serves as the company's letter of introduction to the market, society, and its members.

The manual brings together the philosophy, set of rules, and moral and behavioral principles that should inspire the daily actions of Constructora Concreto employees, both internally and with customers, suppliers, the community, and the general public. These are rules and principles that employees must embrace, respect, and comply with.

8. ETHICAL PRINCIPLES GOVERNING THE ACTIVITY

- Excellence and fulfillment of commitments.
- Duty and right to disagree.
- Integrity, honesty, discretion
- Respect for differences.
- Frugality.
- Compliance with the law.
- Transparency in relationships.
- Personal development
- Freedom of association.
- Environmental conservation.

9. BEHAVIOR GUIDELINES

In developing the above values, principles, and criteria, Constructora Concreto embraces the following practices:

- Not doing business with individuals or legal entities when it is known that their ethical, social, and business conduct is contrary to the law, ethics, and good customs.
 - Responding in a timely and accurate manner, in accordance with the law and the respective contracts, to requests, complaints, and requirements made by its customers.
 - Not to intervene directly or indirectly in activities that are contrary to the law.
 - Not to encourage the practice of giving or receiving gifts or gratuities or offering or accepting social favors, especially with suppliers and contractors, that invite improper practices.
 - Not to engage in activities or manage businesses that are contrary to the interests of the company or that may interfere with the full dedication to or fulfillment of duties and responsibilities.
 - Comply with international anti-corruption rules, standards, and conventions, as well as Colombian legal provisions adopted in the same vein.
 - In tenders and/or invitations, be clear about the purpose of the project to be tendered, the requirements to be met if awarded the contract, and the scope of
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the rights, obligations, and responsibilities of the parties, analyzing and assessing risks in order to prevent and/or minimize them.

10. POLICIES OF THE SYSTEM MANAGEMENT (QUALITY, ENVIRONMENTAL, AND OCCUPATIONAL HEALTH) (QUALITY, ENVIRONMENTAL, AND OCCUPATIONAL HEALTH)

At Constructora Concreto, comprehensive management means being committed to:

- Customer satisfaction.
- Respect for the sustainable development of the ecosystem.
- The construction and maintenance of safe, healthy, and harmonious workplaces.

Constructora Concreto is committed to complying with legal and contractual requirements and to preventing pollution, accidents, occupational diseases, and occupational hazards.

This is achieved by applying knowledge to the provision of engineering and construction services, continuously improving and innovating processes and resources in order to generate social, economic, and environmental benefits for all stakeholders.

11. INFORMATION DISCLOSURE POLICY

Constructora Concreto's information disclosure policy is determined by Decree 2555 of 2010 or any regulation that modifies it, which regulates relevant information. The channel through which relevant information is communicated to the public is the link called Relevant Information on the website of the Financial Superintendency of Colombia.

CHAPTER THREE MANAGEMENT AND ADMINISTRATIVE BODIES

1. ADMINISTRATIVE STRUCTURE

The administrative bodies (Board of Directors and Presidency) are supported by an organizational structure made up of the Vice-Presidencies, the General Secretariat, and the Service Management.

1.1 Vice Presidencies

The Vice-Presidents are responsible for designing, directing, and controlling company policies, supervising the production processes of all financial, human, and information resources, defining strategies, and evaluating growth options to ensure the fulfillment of business objectives.

1.2. General Secretariat

This area is responsible for supporting and coordinating the administrative aspects of the company's Presidency, Board of Directors, and General Shareholders' Meeting, and is responsible for preparing the minutes and all corresponding documentation, in accordance with the legal and statutory regulations governing the Entity.

1.3 Service Managers

Service Management is a center of specialized knowledge responsible for providing high-quality, low-cost resources and services to projects, transferring best practices and optimizing operations.

Senior management compensation policy: [Click here](#)

2. PROCEDURE FOR THE SELECTION AND MANAGEMENT OF COMPANY STAFF PERFORMANCE

The Human Resources Management policy aims to create the optimal conditions for building a team of competent employees focused on management, with the ultimate goal of achieving comprehensive personal and institutional development.

2.1. Personnel Selection

Concreto Construction Company has defined, documented, and standardized procedures in its human talent process that, supported by the Integrated Management System, have allowed it to implement and integrate all processes related to the administration and development of people.

To manage this talent, a competency-based management model has been developed that focuses on analyzing the organization's strategy and culture, identifying profiles that contain competencies that predict and determine the success of individuals in different roles.

CHAPTER FOUR CONTROL MECHANISMS

1. INTERNAL CONTROL ENTITIES

The control entities are:

- 1.1. Audit Committee
- 1.2. Internal Control Department

1.1 Audit Committee

The company has an Audit Committee composed of three (3) members of the Board of Directors, which acts under its authority as a body commissioned by the Board to perform the functions set forth in this Section. These members are elected by the Board of Directors itself with the votes of the majority of its members. The Committee is composed of independent members of that corporate body.

The Committee shall include the participation of the Company's Legal Representative and Statutory Auditor, who shall have the right to speak but not to vote.

1.2. Internal Control

The company has an Internal Control department (Internal Auditor) whose

main function is to lead and execute the control function within the company, in coordination and cooperation with the Statutory Auditor. In carrying out the above, it must analyze and monitor all existing processes in the institution, as well as evaluate, rate, and generate a diagnosis, making recommendations for their improvement.

2. EXTERNAL CONTROL ENTITIES

The external control entities are:

- 2.1. Statutory Auditor.
- 2.2. Financial Superintendency of Colombia.
- 2.3. Quality management system certification entities.

2.1 Statutory Auditor

The company has a Statutory Auditor and an alternate elected by the Shareholders' Meeting for two-year terms. They may be removed at any time and re-elected indefinitely. Updated information regarding the qualifications of the Statutory Auditor and his alternate will be available to investors and shareholders at the offices of the company's General Secretariat.

In order to guarantee objective selection criteria for the company's Statutory Auditor, any shareholder may propose to the General Shareholders' Meeting the names of individuals or legal entities that may perform this function. In any case, such proposal must be supported by all the necessary information to allow the highest corporate body to study it. To this end, such documents must be deposited with the General Secretariat of the Company no later than the business day prior to the date of the Meeting.

Policy on the appointment of the statutory auditor: [Click here](#)

2.2. Financial Superintendency of Colombia

When the company acts as a securities issuer, it shall submit the following information to the Financial Superintendency:

- a. Information prior to the Meeting.** The company shall submit the proposed distribution of profits at least fifteen (15) business days prior to the date set for the General Shareholders' Meeting, or in its place, the report on losses for the fiscal year, and in general, any information that may be requested in the future by said Superintendency.
- b. Post-meeting information.** Within fifteen (15) business days following the date of the General Shareholders' Meeting at which the Financial Statements are approved, the company shall submit the documents that the Superintendency may require, in general or in particular, specifically the following: An update form determined by the Superintendency for this purpose, duly completed; A copy of the minutes of the General Meeting with all its annexes, and a certificate of existence and representation, which must have been issued less than three months prior.
- c. Information for Investors.** As an issuer of securities registered in the National Registry of Securities and Intermediaries, the company shall file its Financial Statements with the Financial Superintendency of Colombia on a quarterly basis, in the formats established by the Superintendency for this purpose, within the terms indicated below:
- The quarterly report as of December, no later than March 1 of the following year, including the notes to the Financial Statements and the Statutory Auditor's report.
 - The quarterly reports ending in March, June, and September, within thirty (30) calendar days following the end of the respective period.

The above reports shall be presented in consolidated form where applicable.

The company must notify the Financial Superintendency, once it becomes aware of any legal, economic, or financial event that is significant to itself, its business, or for the determination of the price or circulation in the market of the securities it has registered in the Registry.

Notwithstanding the foregoing, when the information referred to in this article constitutes a public fact, it shall be communicated to the Financial Superintendency immediately.

The responsibility for sending information lies with the Company's management, without prejudice to the legal duties assigned to the Statutory Auditors by law.

2.3. Quality Management System Certification Bodies

They conduct annual audits to verify compliance with the requirements established in ISO 9001:2008 and ISO 14001:2004 standards for quality and environmental management systems.

At Constructora Concreto, occupational health, quality, and customer-oriented efficiency are priorities. The business units are certified under NTC-ISO 9001:2008 and ISO 14001:2004, which frame the quality system for their services, and IQNET ICONTEC SC-133-1, SC-133-2, and SA-167-1, which frame the Quality and Environmental Assurance System.

CHAPTER FIVE CONFLICTS OF INTEREST

1. DEFINITION

It is defined as a situation in which the interests of the company are in conflict with the personal interests of employees or their families, leading the employee to act under parameters that differ from those established to ensure the genuine and ethical fulfillment of their responsibilities to the company.

The following generates a conflict of interest:

- a. The employee's participation or ownership in companies or businesses that compete with the Organization where they act as a supplier, contractor, or customer.
 - b. Failure to promptly inform superiors of the existence of a conflict, so that the necessary decisions can be made and the conduct reviewed.
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necessary decisions and review of conduct.

- c. Failure to report events in which family members or close associates receive any benefit through ownership or participation in companies with which the company has a commercial or service relationship.
- d. Using information relating to the company or its business for your own benefit or that of family members.
- e. Using your position in the company to divert business opportunities for your own benefit or that of your family members and close associates.
- f. Using company personnel, facilities, equipment, tools, vehicles, and resources of any kind for personal benefit, for the benefit of third parties, or for purposes other than those inherent in the pursuit of the company's corporate purpose.

Members of the Board of Directors, Legal Representatives, members of Senior Management, and other Administrators of the Company must periodically inform the Board of Directors of any direct or indirect relationships they have with each other, or with other entities or structures belonging to the Business Group, or with the Company, or with suppliers, or with customers, or with any other Interest Group (the latter being understood as all those persons who, due to their connection with the Company, have an interest in it. These include the general public, shareholders, employees, customers, users, economic and tax authorities, and the official supervisor), which could give rise to conflicts of interest or influence the direction of their opinion or vote.

2. DUTY TO DISCLOSE THE SITUATION GIVING RISE TO THE CONFLICT

In the event that the company, its administrators, managers, or other employees find themselves in a situation that generates a conflict of interest, the following procedures will be followed depending on whether the conflict is sporadic or permanent:

If the conflict is sporadic, it will be mandatory in the first instance for the person directly involved to inform the Board of Directors or their immediate superior,

as the case may be, about the situation that is causing the conflict and obtain their consent to initiate or continue with the operation. This mechanism may not eradicate the conflict of interest, but it will maintain the transparency of the operation.

On the contrary, if the conflict of interest is permanent and affects the Company's operations as a whole, this situation will constitute grounds for mandatory resignation on the part of the affected party, since they are unable to perform their duties.

In the case of administrators, the provisions of Article 23 of Law 222 of 1995, paragraph 7, and its regulatory decree No. 1925 of 2009 shall apply, and in this regard, it will be necessary to obtain the respective authorization from the General Shareholders' Meeting when it comes to signing contracts or submitting commercial offers in which the respective administrator has an interest, either directly or through an intermediary.

3. INSIDER INFORMATION

Administrators, executives, and officials in general shall maintain confidentiality with regard to confidential information to which they have access by virtue of their positions, and shall therefore refrain from using such information for their direct or indirect benefit or that of third parties.

The administrators, managers, and employees of the company shall maintain confidentiality in the workplace, at home, in social engagements, and in other public places, avoiding comments that could harm the interests of the company, its managers, employees, and customers.

4. SANCTIONS

Shareholders, directors, administrators, or employees who engage in practices that constitute a conflict of interest or disclose confidential information for their own benefit or that of a third party will be subject to the civil, criminal, and labor actions and sanctions provided for in the law and internal work regulations.

5. DISPUTE RESOLUTION

Any disputes arising between shareholders or between shareholders and the company

due to the articles of association, their development or interpretation, during the term of the company, due to its dissolution or during the liquidation process, shall be resolved by an Arbitration Tribunal appointed by the Medellín Chamber of Commerce, which shall be subject to the rules in force for arbitration in accordance with the following rules: a) The Tribunal shall be composed of three (3) arbitrators, b) The internal organization of the Tribunal shall be subject to the rules established for this purpose by the Arbitration and Conciliation Center of the Medellín Chamber of Commerce: c) The Tribunal shall decide in accordance with the law: d) The Tribunal shall operate at the Arbitration and Conciliation Center in the city of Medellín.

CHAPTER SIX TRANSACTIONS BETWEEN RELATED PARTIES

1. DEFINITION OF RELATED PARTY

A party is considered related to the Company if that party:

- a) directly or indirectly through one or more intermediaries:
 - i. controls, is controlled by, or is under common control with, the Company (this includes parent companies, subsidiaries, and other subsidiaries of the same parent company);
 - ii. has an interest in the Company that gives it significant influence over the Company; or
 - iii. has joint control over the Company;
 - b) is an associate (an associate is an entity over which the Company has significant influence, and is not a subsidiary or a joint venture. An associate can take various forms, including entities without a defined legal form, such as business partnerships);
 - c) is a joint venture, where the Company is one of the venturers (a joint venture is defined as a contractual arrangement whereby two or more venturers undertake an economic activity that is subject to joint control);
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- d) is key management personnel of the Company or its parent company;
- e) is a close relative of a person who falls under (a) or (d);
- f) is an entity over which any of the persons in cases (d) or (e) exercises control, joint control, or significant influence, or has, directly or indirectly, significant voting power; or
- g) is a post-employment benefit plan for employees, whether of the Company itself or of another company that is a related party thereof.

2. POLICY ON RELATED PARTY TRANSACTIONS

- i. Assessment: the Audit Committee is responsible for reviewing and assessing the transaction. The conclusions of the assessment are recorded in a report from the Committee to the Board of Directors, which sets out:
 - a) The qualitative or quantitative criteria used to determine the materiality of the transaction.
 - b) The transaction's compliance with the equal treatment of shareholders.
 - c) The price or value of the transaction and compliance with market conditions.
 - d) The timing of the disclosure.
- ii. Approval: transactions with related parties are approved by the Board of Directors, excluding the interested party.

In addition to the above report, a qualified majority of the Board of Directors is required for the approval of these transactions, at least for the most significant ones. This majority must be three-quarters of the Board and the affirmative vote of the Independent Members.

Transactions carried out with related parties on a recurring basis, which are part of the ordinary course of business and are carried out under membership agreements

adhesion contracts or general framework contracts whose conditions are perfectly standardized, are applied on a large scale, are carried out at market prices, and whose individual amounts are not relevant to the company.

- iii. Disclosure: For the subsequent disclosure of transactions between Related Parties that are part of the ordinary course of business, are recurring, and are at market prices, the company provides the market with additional information to the scheme set out by the IFRS and does so at least once a year through the financial statements.

CHAPTER SEVEN

MECHANISMS TO ENSURE EQUAL TREATMENT OF SHAREHOLDERS AND INVESTORS

1. SHAREHOLDER RIGHTS

The company's capital is divided into ordinary, registered, and capital shares. These shares confer on their holders equal rights in the company's assets and in the distribution of profits, and each share is entitled to one vote in the deliberations of the General Shareholders' Meeting, subject to legal limitations.

The company and its administrators guarantee equal treatment to all its shareholders and investors under the terms established by law and these bylaws.

In addition to the rights provided for by law, the company's shareholders have the following rights:

- a. To receive the same information provided to all shareholders of the same class, with the same detail and timeliness.
- b. To be summoned to General Shareholders' Meetings, by the means provided for in the bylaws.

- c. To have their written questions answered by the administrators, either prior to or during the meetings of the Assembly. While the company is a securities issuer, in accordance with the provisions of Article 40 of Law 964 of 2005, when a plurality of shareholders representing at least five percent (5%) of the subscribed shares submits a proposal to the company's Board of Directors, said body shall be obliged to consider it and respond in writing to those who have made it, clearly indicating the reasons for its decisions. Notwithstanding the foregoing, proposals may not relate to trade secrets or strategic information for the development of the Company.
- d. Request that a Shareholders' Meeting be convened when there are well-founded reasons to believe that their rights as shareholders may be violated or when they require information necessary for the exercise of their rights. In any case, this request for a meeting must be made by a plurality of shareholders representing at least one-quarter of the subscribed capital. In the event of disagreement between the legal representative and the requesting shareholders regarding the justification for the call, the Board of Directors shall settle the dispute.

2. COMMUNICATION WITH SHAREHOLDERS

The Board of Directors of Constructora Concreto has approved a procedure that defines the company's practices for interacting with its shareholders in matters such as:

- 2.1. Access to information.
- 2.2. Resolution of requests for information.
- 2.3. The company's channels of communication with shareholders.
- 2.4. Form of interaction between shareholders and the company, its Board of Directors, and other administrators.

2.1. Access to information: All shareholders of Constructora Concreto shall have equal rights to access company information, with the right to equal treatment in exercising such rights.

The company will endeavor to ensure that all its shareholders are fully and timely informed about the ordinary course of business, disclosing the company's financial and non-financial information in a timely and truthful manner, allowing them to have detailed and complete knowledge of the company's progress.

2.2. Resolution of requests for information: By virtue of the right to access the company's information, Constructora Concreto has permanently open channels of communication through which shareholders can express their concerns and receive answers to them, provided that this does not involve the disclosure of confidential information or information relating to trade secrets, or information whose disclosure could be used to the detriment of the company.

Thus, on the website there is a link exclusively for investors, where there is a button called "Shareholder Service" where a series of frequently asked questions are listed with their respective answers. There is also a button called "Contact," where you can leave a message for the Company. Constructora Concreto has a Shareholder Service office, where during business hours, there is a person available to respond to shareholder requests and an email address set up to receive these messages.

2.3. Company communication channels with shareholders: Constructora Concreto has developed the following communication channels with its shareholders:

- website <http://www.concreto.com/inversionistas>
 - Quarterly teleconferences via a website, where the most relevant news of the period is presented, along with financial information and results for the period
 - Email ir@concreto.com
 - via the telephone line 018000 512 333
 - through press releases
 - social media
 - the Colombian Financial Superintendency website, under the relevant information link.
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2.4. Form of interaction between shareholders and the company, its Board of Directors, and other administrators: Interaction between shareholders and the Company mainly takes place at the Ordinary Shareholders' Meeting or at Extraordinary Shareholders' Meetings. However, if a shareholder submits a request for information to the company addressed specifically to the Board of Directors or to a specific administrator, it will be channeled through the Shareholder Services Office, which, after consulting with the General Secretariat, will respond to the shareholder in a timely manner.

CHAPTER EIGHT

GENERAL PRINCIPLES GOVERNING THE ACTIONS OF OFFICERS AND EXECUTIVES WITH INTEREST GROUPS INTEREST

The officers and directors of Constructora Concreto shall take into account the following principles in all their actions in relation to stakeholders:

1. RELATIONS WITH CUSTOMERS

The commitment to customer satisfaction must be reflected in respect for their rights and in the search for solutions that serve their interests. Employees shall clearly explain the terms and conditions of transactions so that customers have a complete understanding of the products and services, as well as the reciprocal obligations that arise in any commercial activity.

Any disclosure of customer information must be in the best interests of the customer and the Company. Business conversations or information must be expressed in clear and specific terms that minimize the possibility of misunderstanding. Company and customer matters should never be discussed in public.

Requests, complaints, and requirements must be addressed in a timely and accurate manner, in accordance with the law and the respective contracts.

2. RELATIONS WITH THE STATE

Relationships with the company with the government and with the entities

and other public authorities will always be handled within the framework of the law and under strict ethical standards, following the principles established in the Code of Ethics. To this end, legitimately constituted institutions and authorities will be respected and supported. We will collaborate with the authorities in the proper application of regulations. Taxes and other economic levies established by law will be paid. Additionally, consensus will be promoted as the ideal mechanism for adopting measures and policies that are in the common interest. Constructora Concreto will refrain from conducting business with individuals who are outside the law.

3. WORKPLACE RELATIONSHIPS

Relationships in the workplace must be characterized by courtesy and respect. Employees shall respect the dignity of the human person and their inherent rights. They shall seek to promote a spirit of collaboration, teamwork, loyalty, and each of the company's values, strictly complying with the rules set forth in the Internal Work Regulations.

They are also obliged to respect their co-workers and their families and not to promote religious or political groups within the company.

4. RELATIONSHIP WITH SUPPLIERS

The selection and hiring of suppliers must always be based on technical, professional, and ethical criteria, taking into account the needs of the company.

The company will seek to establish mutually beneficial relationships with suppliers based on quality, efficiency, respect, the constant pursuit of the common good, and the best conditions for both parties.

The company has procedures in place for selection, awarding, and contracting.

Suppliers and subcontractors are considered strategic allies in Constructora Concreto's value chain. In response to this consideration, a global quality program has been established under the Integrated Quality Management System, which aims to get to know suppliers technically and commercially in order to select them appropriately and establish relationships based on trust, thus moving from short-term to long-term relationships.

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5. RELATIONSHIP WITH COMPETITORS

Relations with competitors must be based on transparency in competition in order to contribute to the revitalization of the construction industry market, while ensuring the promotion of fair, transparent, and good-faith competitive practices.

6. TOWARDS SHAREHOLDERS

Propose the distribution of profits in accordance with the Company's conditions.

Guarantee fair treatment, respecting legitimate rights.

Provide truthful, transparent, and complete information about the state of the company.

7. TOWARDS THE COMPANY ITSELF

Ensure the growth, development, and competitiveness of the Company. Use privileged information appropriately. Refrain from acts that involve conflicts of interest, and encourage research for business improvement and development.

8. TOWARDS TRANSPARENCY

The company will contribute to the consolidation of business environments based on integrity, transparency, and accountability. It will also reject and prohibit bribery in any form, whether direct or indirect.

CHAPTER NINE
INTERPRETATION AND MODIFICATION OF THE CODE, PUBLICITY, AND
VALIDITY

1. INTERPRETATION AND MODIFICATION OF THE CODE

This Code does not modify or repeal any provisions contained in the company's Bylaws. In the event of any contradiction between the Code and the Bylaws, the provisions of the latter shall prevail. Amendments to the Code shall be approved by the Board of Directors, except in cases where such amendments constitute amendments to the Bylaws, in which case they must be approved by the General Shareholders' Meeting.

2. EFFECTIVE DATE

This Code shall come into force on the date of its approval.