

# Business Transparency and Ethics Program

*AmCham Antioquia & Caldas*  
2026



# Business Transparency and Ethics Program

## AmCham Antioquia & Caldas

### Introduction

AmCham Antioquia y Caldas adopts this Business Transparency and Ethics Program (PTEE, by its Spanish acronym) to prevent and minimize the risks of corruption and transnational bribery, consolidating an ethical culture within the organization. This document outlines mechanisms to identify, manage, and control these risks, and applies to all employees, clients, suppliers, contractors, and stakeholders with commercial or contractual relationships.

### Policy

AmCham Antioquia y Caldas pledges its Comprehensive Policy to the prevention, management, and control of risks associated with corruption and transnational bribery, guaranteeing compliance with all applicable legal regulations.

### Key Definitions

- **Members (Afiliados):** Individuals or entities participating in the organization through contributions or membership shares.
- **Compliance Audit:** A systematic review of the Business Transparency and Ethics Program (PTEE).
- **Contractors:** Third parties with contractual relationships, such as suppliers or consultants.
- **Corruption:** Conduct aimed at obtaining illicit benefits to the detriment of public administration.
- **Due Diligence:** The periodic and systematic evaluation of corruption risks.
- **Transnational Bribery:** Offering or giving benefits to foreign public officials in exchange for actions or omissions in international business transactions.

### Regulatory Framework

The PTEE is designed in accordance with Law 1474 of 2011 (Anti-Corruption Statute), Law 1778 of 2016, Decree 124 of 2016, Law 2195 of 2022, and Circular 058 of 2022, along with the internal Code of Ethics of AmCham Antioquia y Caldas.

### Responsibilities

#### Board of Directors

Approves the PTEE and its updates, designates the Compliance Officer, and maintains the institutional commitment against corrupt practices.

#### Legal Representative

Guarantees the necessary resources for the PTEE, orders disciplinary actions against violators, and submits annual reports to the Board of Directors.

#### Administrative and Financial Director (Compliance Officer)

Leads compliance policies, corporate communications, the risk matrix, reporting channels, training, and internal compliance audits.

#### AmCham Antioquia & Caldas

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### **Statutory Auditor (*Revisor Fiscal*)**

Reports acts of corruption and evaluates the PTEE in accordance with Law 2195 of 2022.

### **Directors and Coordinators**

Comply with the manual, execute established internal controls, report risks, and formally declare any conflicts of interest.

### **Employees**

Know and apply the PTEE, report irregularities, and cooperate fully in internal investigations.

### **Risk Management**

#### **Identification and Evaluation**

An internal and external context analysis is performed utilizing a risk matrix that classifies specific threats, vulnerabilities, and impacts related to AmCham Antioquia y Caldas.

### **Policies and Procedures**

- **Due Diligence:** Background checks and verification of third parties prior to and during commercial relationships.
- **Political Contributions and Donations:** Political activities are strictly prohibited. Institutional donations must align with organizational policies and undergo a prior due diligence process.
- **Compensation and Commissions:** Limited strictly to what is stipulated in contracts; personal or unauthorized commissions are prohibited.
- **Travel Expenses:** Must be fully documented and supported; invitations extended to public officials require prior formal approval.

### **Training and Disclosure**

Compliance training is integrated into onboarding processes and annual training plans, supported by a communication strategy via the website for all stakeholders.

### **Reporting Channels**

Confidential reports regarding suspicious activities or misconduct can be filed through the designated Ethics Hotline.

### **Monitoring and Evaluation**

An annual internal audit is conducted to measure the effectiveness and implementation of the PTEE.

### **Sanctions and Document Retention**

Violations of this program will result in labor-related and legal sanctions. Compliance documents will be kept strictly confidential and retained for a period of 5 years.

### **Updates**

This program will be reviewed every 2 years or as required by regulatory changes, led by the Compliance Officer.

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