

INFORMATION DISCLOSURE
POLICY



GRUPO ARGOS

Investments that transform

1. INTRODUCTION

Grupo Argos S.A., hereinafter the Company, seeks to welcome the recommendations proposed in the Code of Best Corporate Practices -Country Code-, including the development and implementation of a Financial and non-Financial Disclosure Policy to the different Stakeholders of the Company and to the financial and capital markets.

In application of the principle of transparency and good corporate practices, the Company has decided to adopt this Information Disclosure Policy, framed within a responsible disclosure of information, subject to legal limits and the right of shareholders to know information other than that granted by the exercise of the Right of Inspection.

2. PURPOSE

Allow the different Stakeholders of the Company to know and access financial and non-financial information, in such a way as to guarantee transparency in the course of corporate business and to allow and facilitate such Stakeholders to make decisions based on truthful, clear, sufficient and timely information.

3. APPLICATION AND SCOPE

This Policy is addressed to the administrators (legal representatives and members of the Board of Directors) and to the Company's collaborators and will apply to all cases in which financial or non-financial information is disclosed to Stakeholders and to the financial and capital markets, whether in compliance with a legal duty, in response to a request for information from an interested party entitled to do so or by simple will of the Company.

Considering that Grupo Argos S.A. is the parent company of Argos Corporate Group, this Policy must look after ensuring, where applicable, the disclosure of information that not only implies knowledge and access to the particular information of the parent company but of the conglomerate in general, in order for third parties to get an idea of the reality, organization, complexity, activity, size and governance model of the conglomerate, as provided by the Country Code.

4. INFORMATION DISCLOSURE

4.1. Information to be disclosed:

The information to which this Policy is subject will be classified based on two criteria:

- I. **Mandatory Nature of the Information:** Depending on whether the disclosure of the information is mandatory or not, it may be:
 - a. **Mandatory Information:**

- **Relevant Information:** The one that the Company is required to disclose to the market through the Finance Superintendence of Colombia, due to its condition as issuer of securities. This type of information is understood as any situation related to the Company or its securities issuances that would have been taken into account by a prudent and diligent expert when buying, selling or holding the respective securities or when exercising the political rights inherent in such securities.
 - **Periodic Information and End-of-Year Information:** That information that the Company must submit to the Finance Superintendence of Colombia in compliance with Decree 2555/2010 or the standards that replace, amend or supplement it.
- b. **Voluntary Information:** The one that, although the Company is not required to disclose by law, is disclosed by it for the sake of transparency, fair treatment and good corporate practices, for considering it of importance to its Stakeholders.
- II. **Nature of the information:** Depending on the subject or topic of the information, it may be:
- a. **Financial Information:** The one related to the financial, accounting and tax situation of the Company.
 - b. **Non-Financial Information:** Any other information that is not classified as financial information, such as business, employment, corporate and legal information.

4.2. Recipients of the information disclosure:

This Policy applies to those cases in which information is disclosed to the different Stakeholders of the Company, who are:

- Shareholders and investors
- Collaborators
- Suppliers
- Government and authorities
- Guild, institutions, and business sector
- Media, influencers and public opinion

It will be understood that the group of “Government and authorities” includes those entities through which the Relevant Information of the Company is disclosed to the market, in this case, the Finance Superintendence of Colombia.

4.3. Ways to disclose information:

The Company has several channels through which the information will be disclosed to its Stakeholders:

I. **Securities Market and General Public:** The main channels are:

- **Integral Information System of the Securities Market -SIMEV-:** It is the set of human, technical and management resources administered by the Finance Superintendence of Colombia to allow and facilitate the supply of information to the market.

Through this mechanism, the Company discloses the Relevant Information and the Periodic and End-of-Year Information that it is required to provide by law, in the terms provided by current regulations for this purpose.

- **Webpage:** Through the portal www.grupoargos.com, which is publicly accessible, the Company's Stakeholders will be able to access not only the Relevant Information that has been reported to the Finance Superintendence of Colombia during different periods, but also corporate information, news of interest, statistics, Company policies, bylaws and other information required by the Country Code and the Single Circular of the Colombian Securities Exchange, having the IR Recognition of the BVC.
- **Social Media:** In response to the technological requirements of social dynamics, the Company has enabled the following social media: Instagram, LinkedIn, Twitter and YouTube, in order to have a continuous, close and easily accessible contact with the general public, making known information and news of interest.
- **Press Releases:** Under the coordination of the Communications Management, written communications are issued to the media that, because they contain a news component, are newsworthy and are then disseminated to the general public.

II. **Shareholders and investors:** The main channels are:

- **Investor Relations Management and Corporate Legal Affairs Management:** These areas will respond to the specific information requirements submitted by investors, shareholders and third parties in general. The one of these two areas that becomes competent to attend the request will provide a written response to the requesting party. In the event that the information is not subject to disclosure, the requesting party will be informed in writing of the reasons why the Company will refrain from providing it.

When the response may put the third party at an advantage, immediate access to such response will be given to the other interested parties, in order to ensure fair treatment.

- **Integrated Report:** The Company publishes this report annually, which is the result of a transparency exercise on the management of the most relevant economic, social, and environmental issues for Grupo Argos and its Stakeholders during the year.
- **Annual Corporate Governance Report:** The Company adopted business parameters that are set out in its Code of Good Governance, in order to generate bonds of trust and transparency with its shareholders, the market and society in general. Through the Annual Corporate Governance Report the Company presents a summary of compliance with the commitments established in the Code of Good Governance.

III. **Administrators and collaborators:** The main channels are:

- **Board of Directors Microsite:** Exclusive portal for the members of the Board of Directors and Board of Directors Support Committees, so that they have access to the minutes of the meetings of these bodies that have been held, as well as the presentations that have been made at the various meetings and other documents presented therein; meeting calendar; news of interest; monthly and quarterly financial information and reports of the Company. Access to this site is restricted to the members of the aforementioned bodies, legal representatives and personnel in charge of updating and uploading documents, restricting access by means of users and passwords, since it contains confidential information.
- **SIPLA Report:** Report submitted annually by the Company's Compliance Officer to the Board of Directors or the body acting on its behalf, in compliance with the provisions of the Basic Legal Circular of the Finance Superintendence of Colombia, in order to disclose the management of the Comprehensive System for the Prevention of Money Laundering and Terrorism Financing.
- **Inversiones Que Transforman (Investments that transform):** This is the Company's main means of communication with its collaborators, in which, by electronic means, matters related to the interests of the Company's personnel are disclosed.
- **Flash news:** These are messages distributed by email, in which relevant Company news that require immediate disclosure are announced to collaborators.

- **WhatsApp Distribution List:** Breaking news that are of necessary knowledge of the collaborators are sent by means of a closed distribution list to the Company's corporate cell phones.

4.4. Mechanisms to ensure the quality of the information disclosed:

In order to ensure proper disclosure of information, the procedure described below should be followed:

- I. **Identification of the information to be disclosed:** Categorize the type of information to be disclosed, according to the classification described in point 4.1 herein.
- II. **Preparation of the information to be disclosed:** The area in charge of preparing the information will be the one that, according to the subject of the information to be disclosed, is competent to know about this matter.

This ensures that the preparation of the documents is carried out by the area that has sufficient knowledge of the subject matter, guaranteeing the truthfulness and accuracy of the information to be provided.

If, for the preparation of the documents, the area in charge requires information to be sent by other areas or by the Company's affiliates and subsidiaries, it must ensure that they provide the information in due time, so as to avoid delays in sending the information that would imply a failure to comply with the established legal deadlines; this, in the event that the disclosure of the information is subject to a deadline.

- III. **Disclosure of the Information:** Once the information has been prepared and reviewed, it will be disclosed, which will be done through the channels that the Company has provided for this purpose, as established in point 4.2 herein.

The disclosure of the Relevant Information to the Finance Superintendence of Colombia will be the responsibility of the Vice President of Talent and Corporate Affairs.

4.5. Handling of confidential or reserved information:

The disclosure of information is restricted and has a limited nature, as the Company will refrain from disclosing information that in case of being public knowledge could cause detriment and be adverse to its interests.

This information will be related to industrial, commercial, financial, strategic or business secrets, whether of the Company, its affiliates or subsidiaries, its shareholders, suppliers, or collaborators.

In addition, information on which the Company has acquired an obligation of confidentiality through the execution of Confidentiality Agreements will also be under reserve.

Confidential or reserved information may only be known to the person who requires access to it to comply with the proposed purpose for which the information is disclosed.

Nevertheless, a confidentiality clause has been included in the employment contracts of the employees, so that they acquire the obligation of confidentiality and due custody of the same. All employment contracts must contain the obligation of confidentiality with respect to the information that the collaborator may come to know by reason of his/her position or functions.

In the case of providers and other Stakeholders who are going to know confidential or reserved information or collaborators who, due to their participation in a project of such magnitude¹, require to reinforce their confidentiality obligation, the person or area of the Company that is having contact with them, must ensure that they execute a Confidentiality Agreement in which these persons - natural or legal - as parties receiving the information, undertake the obligation not to disclose the information without the Company's authorization, to use it only for the purposes for which they have accessed it and to refrain from misusing it, under penalty of indemnifying the Company for any damages that the misuse of the information may cause to the Company.

The request for the preparation and review of Confidentiality Agreements should be made to the Corporate Legal Affairs Management.

4.6. Area responsible for the Information Disclosure Policy:

The Information Disclosure Policy must be approved by the Board of Directors, as well as any modifications made to it.

The Company's Corporate Legal Affairs Management, with the prior approval of the Vice-Presidency of Talent and Corporate Affairs, will be responsible for preparing, disclosing, modifying, and following up on the Information Disclosure Policy.

¹ This type of project is understood to be those that, if completed or perfected, may have an effect on the final value of the Company's shares.