



Reporting Channels



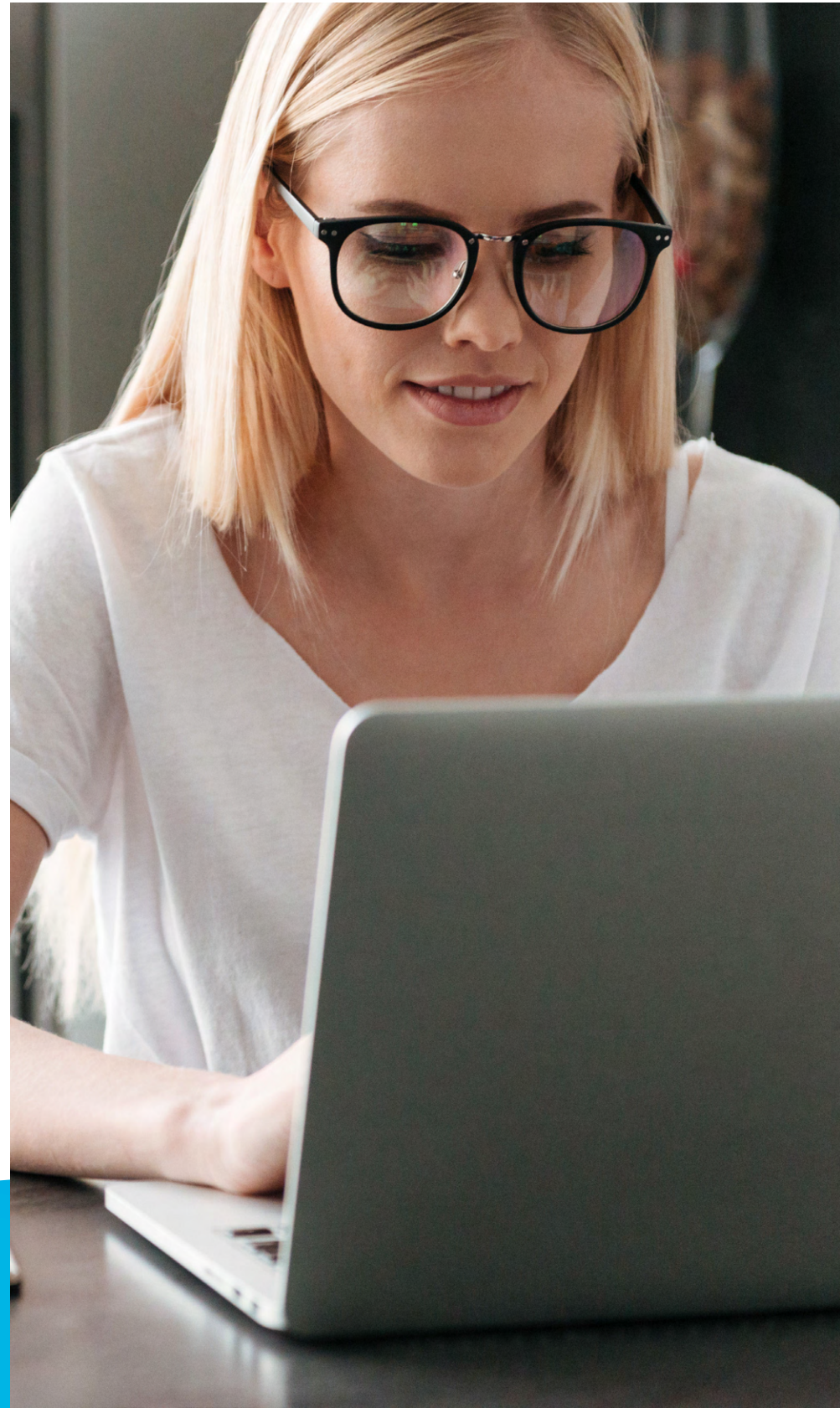
Reporting Channels

What are they?

Secure and anonymous mechanisms, managed by KPMG, so that employees, suppliers, users, clients, customers, consumers and stakeholders can report any type of irregularity in the internal policies of the Carvajal Organization or our Ethical Conduct, in order to ensure compliance with the principles and values of the organization.

What are the Reporting Channels not for?

- They do not replace the internal controls of the Carvajal Organization.
- They do not replace communication instances of the organization.
- They are not a means for answering PQRs or queries in hiring, payments or others.
- They are not a means for intentionally giving false information.



IMPORTANT INFORMATION



You can register your complaint online or by calling the hotline assigned to your country of residence.



These channels will be available:

Web: 24 hours – 7 days

Telephone line: Monday to Friday
8:00 a.m. – 6:00 p.m.
(Colombia Time).



Your reports are confidential, the external administrator of the reporting channels will not track or store your calls and/or IP address.



Each complaint will have a reporting code and a password to be assigned by you. You should keep this information as it will be required in order for you to follow up on your complaint.

What can you report on these channels?

- **Conflict of interest:** A situation faced by an employee, in the course of his/her professional activity, when his/her personal interests, and those of people related to him/her, come into conflict with those of the entity and are incompatible. This situation may affect the performance of the employee or interfere with his/her duties, and lead the employee to act for reasons other than the due and true fulfilment of his/her responsibilities to the entity.
- **Money laundering and terrorist financing:** The acquisition, safeguarding, investment, transport, transformation, custody or administration of assets that derive directly or indirectly from unlawful activities, with the purpose of giving the appearance of legality or concealing the true nature, origin, location or destination of these assets; likewise, any type of financing and/or administration of funds derived from or destined for terrorist activities.
- **Fraud/embezzlement of assets (theft):** Any act or attempt to deceive, scam, steal or lie corresponding to dishonest actions and, in most cases, to criminal acts; likewise, fraud is any activity that involves deceit or fraudulent manipulation of assets or administrative, accounting or operational information of the entity and by means of which a person or group of persons obtain a direct or indirect benefit.



What can you report on these channels?



- **Corruption and/or bribery:** Willingness to act dishonestly by abusing the power entrusted by the entity in exchange for personal benefits, either directly or indirectly, and unfairly favoring third parties against the interests of the entity. In turn, bribery is defined as offering, promising or giving an incentive to influence a decision or obtain an undue advantage for the benefit of oneself, the entity or a third party with which Carvajal has a contractual or business relationship.
- **Misuse of information:** Misuse of information is any activity carried out by a member of the entity to take, steal, tamper with, sell, sabotage or exchange information contained in the systems and/or recordings under the custody of Carvajal.
- **Workplace harassment:** Refers to conduct that creates recurrent psychological pressure, systematically and over a prolonged period of time, on another employee or employees, and which affects their psychological and even physical integrity. This type of harassment can lead to the destruction of a person's reputation, affect his/her communication networks and disrupt the exercise of his/her duties.

What can you report on these channels?



- **Failure to comply with the work disengagement law:** Failure to comply with the work disengagement law is any violation of the right of employees of the Carvajal Organization to suspend their work activities (virtual and physical) and not to have contact, either digitally or by any means, with the tasks they must carry out during their working shift. The end of the working shift means that the employee will not need to be available to carry out the tasks and duties of the job, as he or she will start a period of rest and relaxation.

The above rule shall not apply in the event of force majeure, acts of God or difficult or urgent situations, in which case employees shall be required to comply with the requirements of the job, duties and position.

What can you report on these channels?

- **Internal disputes:** Discussions or disagreements between two or more people in the organization, which generate discontent or discomfort between the parties; these types of disputes are usually momentary or temporary.
- **Sexual harassment:** Sexual harassment is any verbal, physical or psychological conduct of a sexual nature, such as fondling, unnecessary touching such as patting, pinching or brushing against the body, attempted physical abuse, coercion to engage in sexual relations, verbal or written expressions of a sexual nature (e.g. obscene innuendo) or non-verbal expressions of a sexual nature (e.g. display of sexually suggestive pictures, written materials, lewd gestures, etc.) that are unwanted by the person to whom they are made and therefore affect their dignity.
- **Failure to comply with corporate policies and/or external regulations:** Events related to the failure of any shareholder, employee, supplier, customer and counterparties in general to comply with policies on human rights, consumption of psychoactive substances, alcohol and other applicable corporate rules and instructions and/or external regulations, provided that this is not related to the aforementioned typologies.



What can you report on these channels?

- Discrimination:** Discrimination is considered any distinction, restriction, omission or act that excludes or implies unequal treatment of a person or group of people (collaborators, suppliers, clients, shareholders, others) based on any of their characteristics such as sexual orientation, identity, gender, ethnicity, nationality, age, disability, religion, place of origin, social or economic condition, pregnancy, language, opinions, marital status, etc., which has the purpose or effect of preventing or annulling the recognition or exercise of rights, rights and real equality of opportunities and that violate or affect people in any way (physical, psychological, structural, among other forms of violence). The above given by a dominant vision where one person or group of people (collaborators, suppliers, clients, shareholders, others) are considered superior to another for any reason.



Reporting Channels

Telephone Lines



Colombia	018000930149
Ecuador	1800001452
México	8002833378
Perú	080052426

*Geographies not mentioned above should communicate through the Ethics Line web portal.



Website

Web Platform

- 1 Enter the link and click on "register complaint".



The screenshot shows the KPMG Ethics Reporting & Management website. The header features the KPMG logo and the text "Ethics Reporting & Management". Below the header, there is a section titled "What can you do from here?" with the subtitle "Report events that are contrary to the Company's policies and that may jeopardize its reputation." This section contains two main options: "REGISTER" and "CONSULT".

REGISTER

Would you like to register a complaint?

- ✓ Reporting can be anonymous
- ✓ We guarantee security and transparency
- ✓ Priority handling of each case

Register complaint

CONSULT

Do you want to consult the registration of a complaint?

Complaint code:

Code

Password:

Password

Consult complaint

<https://www.kpmgexternalservices.com.co:1641/organizacioncarvajal/complaint/>

Website

Web Platform

- 2 Read and accept the data protection policy and authorize the use of your personal information.

Registration of complaints

Data protection

KPMG, Advisory, Tax & Legal S.A., is responsible for the processing of personal data provided by the complainants, pursuant to Article 10 of Decree 1377 of 2013 and in compliance with Law 1581 of 2012, requests the authorization of such data subjects so that they freely, previously, expressly, voluntarily, and being duly informed, allow the continued storage, use, circulation and processing of their data, which information is and will be used for the analysis and development of investigation by the Company with which they maintain business and/or employment relations, or entrusted to a third party, in order to resolve the complaint. To exercise your right to know, update and rectify your personal data, be informed about the use given to such data, revoke the authorization and/or request the deletion of your data, free of charge, please consult the privacy policy on the website www.kpmg.com/co or contact us at co-fmprivacy@kpmg.com.

I have read the privacy notice and authorize the use of my personal information

Cancel

Next

- 3 Read and accept the terms and conditions.

Registration of complaints

Terms and conditions

This website is owned and operated by KPMG, Advisory, Tax & Legal S.A. (hereinafter KPMG). These Terms set out the terms and conditions under which you may use our website. This website is designed to receive your complaint of events that are contrary to and jeopardize the reputation of the company with which you have business and/or employment relations. By accessing or using our service website, you acknowledge that you have read, understood and agree to be bound by these terms: - KPMG, is not responsible for the accuracy of the information you register in the complaint, in which case you are responsible for the accuracy of the information you register. - KPMG reserves the right to close those cases that are not related to the established types of complaints and/or that correspond to concerns and disagreements with the service received. - KPMG is not obliged to provide a response to your case in a specific time, provided that cases received are not treated as a PQR and depending on their severity, the time of investigation by the professional designated by the Company with which you maintain business and/or employment relations, may vary. - You have the right to make the complaint anonymously, KPMG will not disclose such information to the professional designated by the Company with which you have business and/or employment relations, who is in charge of reviewing the case. KPMG reserves the right to close the case if within five (5) working days you do not respond to the extension request made through the contact details authorized by you for such purpose. - You must keep strictly confidential the assigned case number and password that will allow you to track your case. - Browsing this site gives you the status of user and implies full and unreserved acceptance of each and every one of the provisions included in these general conditions of use, so if you do not agree with any of the conditions set forth herein, you should not use this website. - KPMG reserves the right to unilaterally change, modify, add or remove any part or all of these terms and conditions at any time and without prior notice. - In the event that during the analysis made by KPMG of the situation reported, it establishes that it corresponds to a PQR, the case will be transferred to the corresponding customer service area with the contact details provided, considering that such is the official channel of the Company to receive such requests and they are not part of the situations that can be reported through this reporting channel.

Accept terms and conditions

<https://www.kpmgexternalservices.com.co:1641/organizacioncarvajal/complaint/>

Website

Web platform

4 Select whether you wish to remain anonymous and click "next".

You are invited to disclose your identity, which will be kept confidential and disclosed only to persons responsible for verifying your case. No means will be used to learn your identity unless you allow it; however, providing your contact information may help us expedite our handling and be more timely.

Do you wish to remain ANONYMOUS for this complaint?

Yes No

Cancel

Next



If you decide to make your complaint non-anonymously, you must enter your contact information such as name, ID, e-mail address and telephone number and/or cell phone number.

<https://www.kpmgexternalservices.com.co:1641/organizacioncarvajal/complaint/>

Website

Web Platform

- 5 Select the type of complaint related to your report.

Ethics Reporting & Management

What types of issues can I address or report through the reporting mechanisms?
Select the type of complaint you wish to file

TYPOLOGIES

Conflict of Interest	See details
Money Laundering and Terrorist Financing	See details
Misuse of Information	See details
Sexual Harassment	See details
Corruption or Bribery	See details

Failure to Comply with Corporate Policies or External Regulations	See details
Fraud or Embezzlement of Assets	See details
Workplace Harassment	See details
Internal Disputes	See details

[Cancel](#)

Corruption or Bribery

Willingness to act dishonestly by abusing the power entrusted by the Entity in exchange for personal benefits, either directly or indirectly and unfairly favoring third parties against the interests of the entity; in turn, bribery is defined as offering, promising or giving an incentive to influence a decision or obtain an undue advantage for the benefit of oneself, the Entity or a third party, with which Carvajal has a contractual or business relationship.

[Accept](#)

If you are not clear about the type of your complaint, you can click on "see details" to display a brief description of it.

<https://www.kpmgexternalservices.com.co:1641/organizacioncarvajal/complaint/>

Website

Web Platform

6 Enter the requested information and click "next".

What situation do you wish to report? * Do you know the exact date on which the events occurred? *

Situation Select start date

Additional questions:

Question 1
Which company in the organization is your report related to?

Select

WHERE THE EVENTS OCCURRED

Additional questions:

Question 1
Country

Select

Question 2
City

Select

Keep the report number in a safe and easy-to-remember place and assign an 8-digit password, these two pieces of information will be required if you wish to follow up on your complaint.

Questions with * are mandatory

COMPLAINT

Who is involved in the events you are reporting?
Full names, company names and areas *

Names Positions

Do you have any information to substantiate the events you are reporting, please attach (optional)

Choose File No file chosen

Choose File No file chosen

Choose File No file chosen

Any witness(es) who can corroborate the facts?
Full names, company names or areas

Full names, company names or areas

Emails

Emails

Page 2 of 2 Back

In the "situation to report" field, try to be very specific and give as much detail as possible that is relevant to the investigation of the report.

SITUATION TO REPORT

What situation do you wish to report?

<https://www.kpmgexternalservices.com.co:1641/organizacioncarvajal/complaint/>

Website

Web Platform

Keep the report number in a safe and easy-to-remember place and assign an 8-digit password, these two pieces of information will be required if you wish to follow up on your complaint.

Complaint 4EB969A registered

Your report was registered with the code 4EB959A, you can follow up from this platform, through the line 018000111111 and the e-mail address CSDCNotificaciones@carvajal.com. Create a minimum 8-digit password that you can easily remember.

Remember not to share the report code or password, these data are for personal and confidential use.

Note: For confidentiality reasons, we suggest you do not share the complaint code. Keep the complaint code, you will need it in case you need to follow up through the established channels.

Password

Confirm Password

Finish

<https://www.kpmgexternalservices.com.co:1641/organizacioncarvajal/complaint/>

Website

Web Platform

After entering the consultation module, the complainant will be able to view the actions taken by the company on his/her report; in addition to this, by clicking on the "add activity" button, you can add complementary information to the initial report, if required by the company or if the complainant considers it necessary.

The screenshot shows the KPMG Ethics Reporting & Management web platform. At the top, there is a blue header with the KPMG logo and the text "Ethics Reporting & Management". Below the header, a grey box contains the text: "What can you do from here? Consult the progress of the resolution of your case." The main content area is titled "CONSULT" and displays the following information:

- Complaint code: OB1AA5A
- Registered on: 08-20-2021 05:20:54 pm
- Status: Follow-up
- Complainant: OB1AA5A
- Stage: Extension

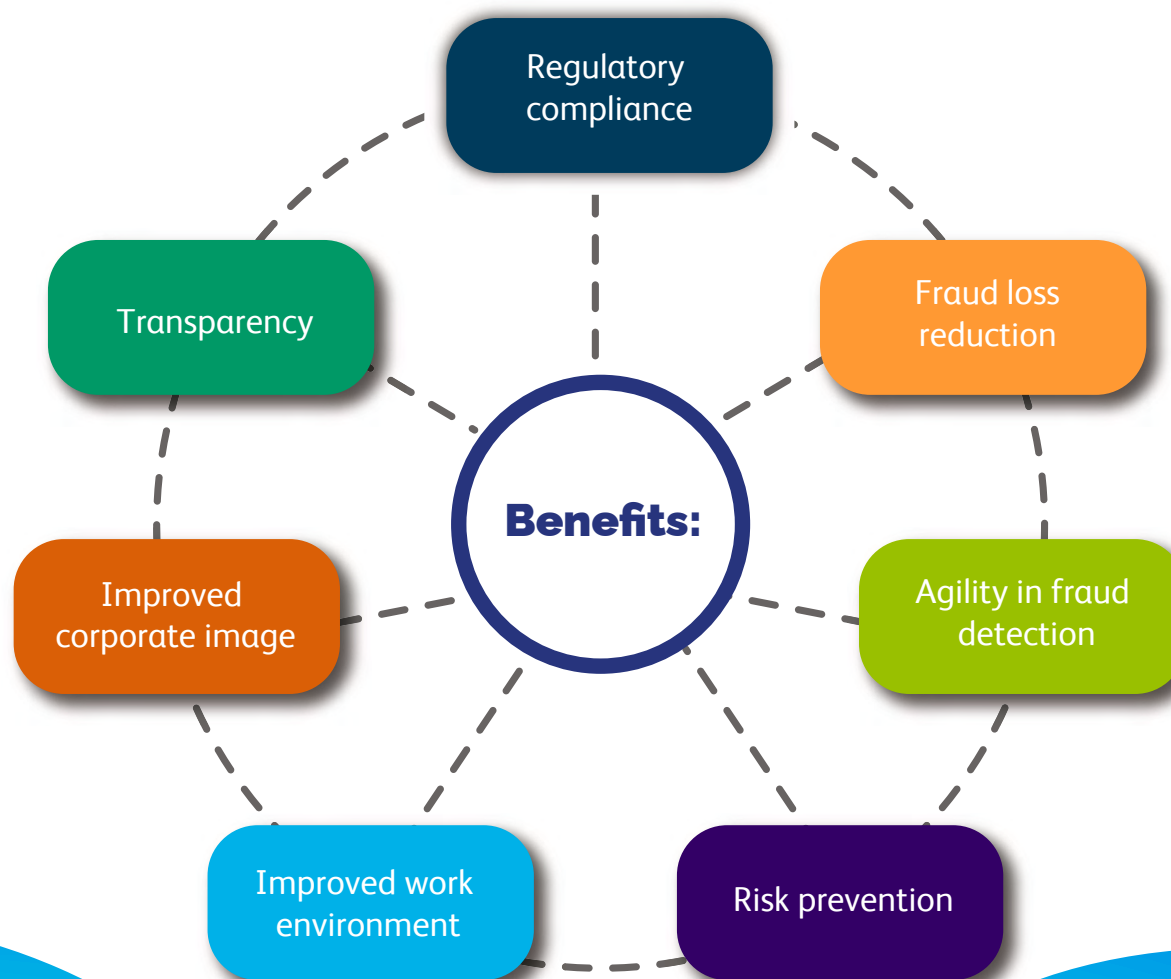
There is a "Close" button in the top right corner. Below the main information, there is a section for "Extension" with the date "8/20/2021". A blue message bubble contains the text: "I need a quick response to the case. Thank you". At the bottom right of this section, there is a green "Add activity" button, which is circled in blue. A "Close" button is also visible in the top right corner of the main content area.

For security reasons, the application closes after 10 minutes of inactivity.
The complainant's responses will be highlighted in blue.

<https://www.kpmgexternalservices.com.co:1641/organizacioncarvajal/complaint/>

Benefits of KPMG managing the reporting channels

- Independence, transparency and neutrality.
- Permanent service.





Carvajal 
HACE LAS COSAS BIEN

*Línea
Ética* 