

TRANSPARENCY AND BUSINESS ETHICS PROGRAM MANUAL ASSA ABLOY SAS

UNDER THE ASSA ABLOY SAS BUSINESS ETHICS SYSTEM

Approved by ASSA ABLOY SAS according to
Minute No. _____ of ____ (day) _____ (month) _____ (year)

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Table of Contents

INTRODUCTION	4
1. OBJECTIVE AND SCOPE	4
2. REGULATORY FRAMEWORK	4
2.1. NATIONAL	4
2.2. INTERNATIONAL	4
3. DEFINITIONS	5
4. ASSA ABLOY'S BUSINESS ETHICS SYSTEM	6
4.1. Policies related to the Transparency and Business Ethics Program	7
4.1.1. Competition Policy and Antitrust Laws:	7
4.1.2. Data Protection Policy:	7
4.1.3. Anti-Corruption and Anti-Bribery Policy:	7
a. Business Representatives:	8
b. Discounts, refunds, commissions, and bonuses:	8
c. Bonuses:	8
d. Political contributions:	8
e. Charitable donations and sponsorships:	8
f. Entertainment and gifts:	8
4.1.4. Conflicts of Interest Policy:	8
4.1.5. Export Control Regulations Policy:	8
5. RISK MANAGEMENT	8
6. RESPONSABILITY AND CONTROL	9
7. DUE DILIGENCE	9
8. WARNING SIGNS	9
8.1. In the analysis of accounting records, transactions, or financial statements	9
8.2. In the corporate structure or corporate purpose	10
8.3. In the analysis of transactions or contracts	10
9. COMPLIANCE AUDITS	10
10. RESPONSIBILITIES	11
10.1. Shareholders' Meeting – Vice President, Latin America	11
10.2. Legal Representative	11
10.3. Compliance Officer	12
10.4. Statutory Auditor	13
11. TRAINING AND DISSEMINATION	13

12.	REPORTING OF TRANSNATIONAL BRIBERY ACTIVITIES AND OTHER CORRUPT PRACTICES.....	14
13.	SUPERVISION AND MONITORING	14
14.	UPDATES.....	15
15.	DOCUMENT RETENTION	15
16.	PENALTIES	15

INTRODUCTION

ASSA ABLOY Colombia S.A. S, hereinafter ASSA ABLOY, is committed to complying with the standards of transparency and accountability for acts of Transnational Bribery and other corrupt practices set forth in Law 1778 of 2016, External Circular 100-000011 of August 6, 2021 and External Circular 100-000003 of July 26, 2016, issued by the Superintendency of Companies, and with those international anti-corruption regulations applicable to it, including, without limitation, the U.S. Foreign Corrupt Practices Act (FCPA).

ASSA ABLOY has a Business Ethics System that includes regulations, procedures, and resources aimed at preventing any corrupt practices by its employees, suppliers, and customers in its activities.

In accordance with its Business Ethics System, ASSA ABLOY implements this Transparency and Business Ethics Program Manual, through which it compiles such policies, procedures, and controls established to prevent and mitigate any corrupt practices within the framework of its activities.

1. OBJECTIVE AND SCOPE

This Manual applies to the entire ASSA ABLOY organization and aims to provide a set of guidelines to identify, prevent, detect, manage, and control the risks of Transnational Bribery, as well as any act of corruption that may affect ASSA ABLOY from the actions of its Shareholders, Managers, customers, suppliers, and employees, aligned with ASSA ABLOY's codes of conduct.

The policies and procedures referenced herein have been adopted and approved by ASSA ABLOY in accordance with the provisions of the Business Ethics System.

2. REGULATORY FRAMEWORK

In compliance with the guidelines established by the Superintendency of Companies in Colombia, this Manual considers the following regulations:

2.1. NATIONAL

- Law 1778 of February 2, 2016.
- Resolution 100-000011 of August 9, 2021.
- External Circular 100-000003 of July 26, 2016.
- Law 222 of December 20, 1995.
- Decree 1736 of December 22, 2020.

2.2. INTERNATIONAL

- The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- The Inter-American Convention against Corruption of the Organization of American States-OAS;
- The Criminal Law Convention on Corruption of the Council of Europe;

- The Civil Law Convention on Corruption of the Council of Europe;
- The African Union Convention on Preventing and Combating Corruption;
- The United Nations Convention Against Corruption (UNCAC).

3. DEFINITIONS

- **Associates (Partners and Shareholders):** Those natural or legal persons who have made a contribution in money, work, or other assets appreciable in money to a company in exchange for stocks, shares of interest, shares, or any other form of participation provided for by Colombian law.
- **Compliance Audit:** This is a systematic, critical, and periodic review of the proper implementation of the Transparency and Business Ethics Program.
- **Corruption:** The offer, payment, promise of payment, or authorization of payment of any currency, or offers, gifts, promises of delivery, or authorization of delivery of anything of value to:

Any foreign public official for the purpose of:

- A) (i) Influencing any act or decision of such a foreign official in the exercise of his/her official duties, or (ii) inducing such a foreign official to do or omit any act in violation of such an official's lawful duties.
 - B) Inducing such a foreign official to use his/her influence with a foreign government or body to alter or influence any act or decision of such a government or body in order to assist such an issuer in obtaining or retaining a business or running a business for any person.
- **Due Diligence:** This refers to the periodic review of the legal, accounting, and financial aspects related to an international business or transaction whose purpose is to identify and assess the risks of Transnational Bribery that may affect a Legal Entity, its Subordinate Companies, and Contractors. With regard to Contractors, it is also suggested to carry out a verification of their good credit and reputation.
 - **Compliance Officer:** This is the natural person appointed by the Shareholders' Meeting to lead and mitigate the risks of Transnational Bribery or any corrupt practices. The same individual may, if so decided by the competent bodies of the Legal Entity, assume functions in relation to other risk management systems, such as those related to money laundering and financing of terrorism, protection of personal data, and prevention of infringements on the competition regime.
 - **Legal Person:** A fictitious person capable of exercising rights and contracting obligations, which refers to the entities that should implement a Transparency and Business Ethics Program.

- **Corrupt practice:** It consists of offering, giving, receiving, or soliciting, directly or indirectly, anything of value to unduly influence the actions of another party or for one's own benefit.
- **Transparency and Business Ethics Program:** These are the specific procedures in charge of the Compliance Officer, aimed at implementing the Compliance Policies in order to identify, detect, prevent, manage, and mitigate the risks of Transnational Bribery, as well as others related to any act of corruption that may affect a Legal Person.
- **Foreign Public Official:** It shall be understood as any person holding a legislative, administrative, or judicial position in a State, its political subdivisions, local authorities, or a foreign jurisdiction, regardless of whether the individual has been appointed or elected. A foreign public official is also a person who exercises a public function in a State, its political subdivisions, local authorities, or a foreign jurisdiction, whether within a public body, a State enterprise, or an entity whose decision-making power is subject to the will of the State, its political subdivisions, local authorities, or a foreign jurisdiction. Any official or agent of a public international organization shall also be deemed to hold that status.
- **Bribery:** The offer, payment, promise of payment, or authorization of payment of any currency, or offers, gifts, promises of delivery, or authorization of delivery of anything of value to any foreign public official.
- **Transnational Bribery:** The act by which a legal person, through its Employees, administrators, Associates, Contractors, or Subordinate Companies, gives, offers or promises to a foreign public official, directly or indirectly: (i) sums of money, (ii) pecuniary valuables, or (iii) any benefit or utility in exchange for said public servant omitting or delaying any act related to his/her functions and in connection with an international business or transaction.

4. ASSA ABLOY'S BUSINESS ETHICS SYSTEM

In its priority to guarantee honest and responsible behavior in its relationship with people and the environment, ASSA ABLOY has established its principles and commitment through its Code of Conduct and policies addressed to its employees, suppliers, and customers, recognizing its responsibility in the business and social environment.

The core values (Empowerment, Innovation, and Integrity) guide day-to-day actions and business decisions. At ASSA ABLOY, employees must be accountable to customers and shareholders by maintaining a high standard of integrity and transparency.

Therefore, ASSA ABLOY has adopted a Business Ethics System under the guidelines of the Code of Conduct and Corporate Policies, with the commitment to comply with applicable laws around the globe being relevant in all the company's actions, whose implementation is the responsibility of the entire organization.

The Business Ethics System ensures compliance with internal laws and regulations to which the company is committed under its responsibility. It is about the adherence to the rules and integrity in the conduct of both the management and the employees of the company.

4.1. Policies related to the Transparency and Business Ethics Program

The policies and procedures associated with the business ethics system are duly documented and accessible through the company's intranet, adopted and localized by ASSA ABLOY as detailed below:

4.1.1. Competition Policy and Antitrust Laws: This policy is aligned with ASSA ABLOY's commitment not to engage in anticompetitive agreements or practices. Its employees shall avoid any type of anticompetitive agreement or concerted practice, tacit or otherwise, with actual or potential competitors of ASSA ABLOY, including the exchange of competitively sensitive information between organizations in the same sector or agreeing on resale prices with customers or dictating resale prices. ASSA ABLOY's Antitrust and Competition Law Compliance Program provides information on other types of conduct towards partners and customers that may be considered illegal.

4.1.2. Data Protection Policy: ASSA ABLOY treats personal data responsibly and reliably, and it is compliant. ASSA ABLOY has adopted a global Data Protection Compliance Program (the "DPCP") based on a set of globally recognized data protection principles to facilitate compliance. The DPCP policies and procedures are available as a reference for ASSA ABLOY employees.

Personal data must be adequate, accurate, and up-to-date. Their use must be limited to relevant purposes, and they must not be stored longer than necessary to ensure security and confidentiality. ASSA ABLOY processes the data for four main reasons: for legal purposes, for enforcing contracts with individuals, for legitimate business interests, and for consent. For handling and processing, written agreements must be in place defining the scope of use of the data and the security provided to them, such as encryption, anonymity, and confidentiality.

4.1.3. Anti-Corruption and Anti-Bribery Policy: ASSA ABLOY shall not accept corruption in any form. By this, we mean that ASSA ABLOY prohibits its employees from making or approving offers, promises, payments, gifts, or valuable goods to any person with the intention of unduly influencing such person's decision.

This includes, but is not limited to, gifts and entertainment in both ways, whether given or received, which must be of limited value and for a well-documented and reasonable commercial purpose that does not unduly interfere with the result of commercial transactions, specifically with public or government officials or employees, politicians, or other public individuals, which should be carefully scrutinized.

- a. **Business Representatives:** As ASSA ABLOY may be held liable for any improper conduct of its business partners when acting for or on behalf of ASSA ABLOY, any person acting for or on behalf of ASSA ABLOY must comply with the ASSA ABLOY Code of Conduct for Business Partners.
- b. **Discounts, refunds, commissions, and bonuses:** Excessive price concessions and compensation, such as discounts, refunds, commissions, and bonuses, could be used to facilitate bribery. The terms of these arrangements must be in writing and commercially reasonable. In addition, all expenses for food, travel, and lodging must be duly authorized by the respective management.
- c. **Bonuses:** ASSA ABLOY will not pay what are known as bonuses or incentive payments.
- d. **Political contributions:** ASSA ABLOY will not make political donations. Individual participation in politics will never involve the use of ASSA ABLOY's funds, time, equipment, resources, facilities, brand, or name.
- e. **Charitable donations and sponsorships:** ASSA ABLOY supports charitable organizations for legitimate purposes. The purpose of donations should be to benefit society in a way that reflects corporate social responsibility. ASSA ABLOY will not use charitable donations or sponsorships as a means of bribery. For more information, see the Compliance section on the ASSA ABLOY intranet.
- f. **Entertainment and gifts:** Entertainment, gifts, and small expenses may be accepted after prior consideration, except where such arrangements may unduly affect the outcome of commercial transactions. Purchasing and selling activities should be carried out with the greatest possible integrity; any expenses related to public or government positions or employees, politicians, or other public persons should be examined with the utmost care since, in many countries, it is illegal to offer entertainment, gifts, and expenses to such public and government officials or employees.

4.1.4. Conflicts of Interest Policy: Any conflict of interest between the employee and the company should be avoided. In the event of such a conflict, or if it is feared that such a conflict may arise, the employee shall inform the company in writing and discuss it with their immediate supervisor. Possible conflict of interest situations arise in the following areas: External commercial activities, Personal financial interests, and Internal information.

4.1.5. Export Control Regulations Policy: Compliance with applicable Export Control Regulations is essential to ASSA ABLOY as these regulations are often aimed at limiting activities that ASSA ABLOY does not support, such as terrorism.

5. RISK MANAGEMENT

ASSA ABLOY currently has documented procedures for identifying, assessing, and prioritizing risks that may affect the company, including the risks of transnational bribery and any other corrupt practices.

These assessments are reviewed annually, or earlier if any news occurs, through the International Supply Chain Risk Identification and Management Matrix, allowing each process to establish and/or maintain controls to ensure risk mitigation.

6. RESPONSABILITY AND CONTROL

The Shareholders' Meeting, or its designee, must ensure compliance with this program, which involves general and special reviews. However, these measures do not exempt ASSA ABLOY employees from their duties under this Program and the Policies supplementing it.

The introduction and implementation of this Program will be reviewed periodically through audits or, if necessary, may also be carried out before the agreement, especially if there is a specific and justified reason to do so.

7. DUE DILIGENCE

ASSA ABLOY has established controls through the signing of labor contracts that include the commitment to comply with the ASSA ABLOY Code of Conduct, competition policy and antitrust laws, data protection, anti-corruption, anti-bribery, conflict of interest, Export Control Regulations, and other documentary provisions that the company has determined for the exercise of their economic activity.

Customers and suppliers must regularly address, among others, the legal, accounting, and financial issues related to good credit and reputation, for which strict compliance controls and policies have been established, such as the ASSA ABLOY Code of Conduct for customers and suppliers.

Therefore, the Business Ethics System, with the support of the ASSA ABLOY Shareholders' Meeting, will encourage the development of regular monitoring activities in relation to customer and supplier process compliance. The results, including remarks and findings, will be discussed annually during scheduled meetings with the Shareholders' Meeting. The next steps will be discussed with the compliance officer, including remediation actions and mitigation strategies.

8. WARNING SIGNS

The following are some warning signs to be considered in the development of activities to mitigate the risks of corruption and transnational bribery:

8.1. In the analysis of accounting records, transactions, or financial statements

- a. Invoices that appear to be false, do not reflect the reality of a transaction, or are inflated and contain excess discounts or refunds.
- b. Foreign transactions whose contractual terms are highly sophisticated.
- c. Transfer of funds to countries considered tax havens.
- d. Transactions that have no logical, economic, or practical explanation.
- e. Transactions outside the ordinary course of business.
- f. Transactions in which the identity of the parties or the origin of the funds is unclear.
- g. Assets or rights included in the financial statements that have no real value or do not exist.
- h. Request by any counterparty (employee, customer, supplier, partner, or shareholder) for the elimination, modification, or change of accounting records.
- i. Request for modification of accounting reports by any counterparty.

8.2. In the corporate structure or corporate purpose

- a. Complex or international legal structures with no apparent commercial, legal, or tax benefits or owning and controlling a legal entity with no commercial purpose, mainly if it is located abroad.
- b. Legal persons with structures in which there are national trusts, foreign trusts, or non-profit foundations.
- c. Legal persons with structures of "offshore entities" or "offshore bank accounts".
- d. Non-operational companies under the terms of Law 1955 of 2019 or that, due to business development, may be considered "paper" entities, that is, that reasonably do not fulfill any commercial purpose.
- e. Companies declared as fictitious suppliers by the National Directorate of Taxes and Customs (DIAN in Spanish).
- f. Legal persons where the Beneficial Owner is not identified (as this term is defined in Chapter X of the Basic Legal Circular).

8.3. In the analysis of transactions or contracts

- a. Frequent recourse to consulting and intermediation contracts and the use of joint ventures.
- b. Contracts with Contractors or state entities that give the appearance of legality but do not reflect precise contractual duties and obligations.
- c. Contracts with Contractors that provide services to a single customer.
- d. Unusual losses or gains on contracts with Contractors or state entities, or significant changes without commercial justification.
- e. Contracts that contain variable remunerations that are not reasonable or that contain payments in cash, in Virtual Assets (as this term is defined in Chapter X of the Basic Legal Circular), or in kind.
- f. Payments to PEPs (Politically Exposed Persons) or persons close to the PEPs.
- g. Payments to related parties (Associates, Employees, Subordinate Companies, branches, among others) without apparent justification.

9. COMPLIANCE AUDITS

In compliance with the Business Ethics System and related Policies, ASSA ABLOY implements Compliance Audit processes in relation to its employees, customers, and suppliers, as described in its Policies, standardized procedures, and guidelines for such purposes.

The results, including remarks and findings, remediation actions, and mitigation strategies when applicable, will be reviewed in accordance with current and applicable Policies and, in particular, in accordance with the Business Ethics System and through the Compliance Officer at its annually scheduled meetings.

In addition to the Compliance Officer's management, the Statutory Auditor shall validate the data in books, accounting accounts, software, and other financial information to verify whether the data are reliable and ensure that in the transfer of money or goods, no undue payments related to bribes, corruption, or commissions, among others, are hidden. The above is performed in accordance with the provisions of Article 207 of the Code of Commerce and the applicable accounting standards.

10. RESPONSIBILITIES

ASSA ABLOY is committed to the Business Ethics System through the related policies and local processes implemented to complement it. The persons responsible for its implementation are listed below:

10.1. Shareholders' Meeting – Vice President, Latin America

- a) Issue and define the Compliance Policy.
- b) Define the profile of the Compliance Officer in accordance with the Compliance Policy.
- c) Appoint the Compliance Officer.
- d) Approve the document that covers the Transparency and Business Ethics Program (PTEE in Spanish).
- e) Assume a commitment to prevent the Risks of Corruption and Transnational Bribery so that ASSA ABLOY can carry out its business ethically, transparently, and honestly.
- f) Ensure the provision of the economic, human, and technological resources required by the Compliance Officer to perform their work.
- g) Order the pertinent actions against associates who have management and administrative functions at ASSA ABLOY, employees, and administrators when any of the above violates the provisions of the PTEE.
- h) Lead an appropriate communication and education strategy to ensure effective disclosure and knowledge of the Compliance Policies and the PTEE to Employees, Associates, Contractors (according to the Risk Factors and Risk Matrix), and other identified stakeholders.

10.2. Legal Representative

- a) Submit with the Compliance Officer the proposal of the PTEE for approval of the Shareholders' Meeting.
- b) Ensure that the PTEE aligns with the Compliance Policies adopted by the Shareholders' Meeting.
- c) Provide effective, efficient, and timely support to the Compliance Officer in the design, management, supervision, and monitoring of the PTEE.
- d) Certify to the Superintendency of Companies the compliance with the provisions of this Chapter when required by the Superintendency.
- e) Ensure that the activities resulting from the development of the PTEE are duly documented so that the information meets the criteria of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality, leaving the supporting documents.

10.3. Compliance Officer

- a) Submit with the legal representative the proposal of the PTEE for approval of the Shareholders' Meeting.
- b) Submit, at least once a year, reports to the Shareholders' Meeting. As a minimum, the reports must contain an assessment and analysis of the efficiency and effectiveness of the PTEE and, if applicable, propose the respective improvements. Likewise, demonstrate the results of the Compliance Officer's management and ASSA ABLOY's management in general in complying with the PTEE.
- c) Ensure that the PTEE aligns with the Policies established by the Code of Conduct adopted by the Shareholders' Meeting.
- d) Ensure effective, efficient, and timely compliance with the PTEE.
- e) Implement a Risk Matrix and update it according to ASSA ABLOY's own needs, its risk factors, the materiality of the Corruption and Transnational Bribery Risk, and according to the "Policies established by the Code of Conduct."
- f) Define, adopt, and monitor actions and tools for detecting the Corruption and Transnational Bribery Risk in accordance with the Compliance Policy to prevent Corruption and Transnational Bribery Risk and the Risk Matrix.
- g) Ensure the implementation of appropriate channels to allow any person to confidentially and securely report noncompliance with the PTEE and possible suspicious activities related to Bribery and Corruption.
- h) Verify the proper application of ASSA ABLOY's whistleblower protection policy and, concerning employees, the workplace harassment prevention policy in accordance with the law.
- i) Establish ASSA ABLOY's internal investigation procedures to detect noncompliance with the PTEE and acts of Bribery and Corruption.

- j) Coordinate the development of internal training programs.
- k) Verify compliance with Due Diligence procedures applicable to ASSA ABLOY.
- l) Ensure proper archiving of supporting documents and other information related to the management and prevention of Corruption and Transnational Bribery Risk.
- m) Design the methodologies for classification, identification, measurement, and control of the Corruption and Transnational Bribery Risk that will be part of the PTEE.
- n) Conduct the assessment of compliance with the PTEE and the Corruption and Transnational Bribery Risk to which ASSA ABLOY is exposed.

10.4. Statutory Auditor

ASSA ABLOY, in compliance with the applicable local regulations in force in Colombia, has a Statutory Auditor, who is required to oversee the operations executed in ASSA ABLOY, as well as to report to the corresponding criminal, disciplinary, and administrative authorities acts of corruption, as well as the alleged commission of a crime against public administration, a crime against the economic and social order, or a crime against economic assets detected in the years under review and to comply with the applicable local regulations and, as far as legally permissible, to inform the corporate and administrative bodies of ASSA ABLOY of the relevant findings that may be detected within the framework of the audit conducted.

In accordance with Law 1778 of 2016, the person who will act as Statutory Auditor is vested with oversight powers exceeding those of representing the partners' interests concerning the operations executed in ASSA ABLOY. In fact, in accordance with the provisions of Article 32 of the aforementioned law and paragraph 5 of Article 26 of Law 43 of 1990, the Statutory Auditors acquire the obligation to report to the criminal, disciplinary, and administrative authorities any possible acts of bribery and corruption that they may have detected in the exercise of their duties.

11. TRAINING AND DISSEMINATION

The Shareholders' Meeting and the Compliance Officer develop training and communications programs on corporate compliance and the Ethics System in corporate businesses. These trainings are reviewed periodically and must be assigned and complied with by the identified relevant stakeholders in a timely and documented manner.

The code of conduct must be socialized when the employee joins the company, i.e., when the contract is signed, leaving a record in the FOR-GH-012 Form of Delivery of the Code of Conduct. Subsequently, socialization will be made in the reinductions or training scheduled by the Human Resources area or the Compliance Officer.

The implementation of the required training programs is mandatory and must be carried out for each ASSA ABLOY employee, which is monitored by the Human Management

process, which periodically reports to the immediate supervisors the news of personnel who do not attend to comply with the annual schedule. All training records related to the Business Ethics System are subject to review and audit.

In addition, training is provided to third parties as indicated in the ASSA ABLOY Training Policy, which describes the disclosure procedure, so that counterparties are aware of and trained on the company's Compliance Policies and PTEE.

12. REPORTING OF TRANSNATIONAL BRIBERY ACTIVITIES AND OTHER CORRUPT PRACTICES

If an individual is concerned about something or wishes to file a complaint or report a violation associated with bribery, corruption, fraud, or other corrupt practices, they should inform the Compliance Officer at oficialdecumplimiento.aaco@assaabloy.com.

If an employee has difficulty reporting an issue locally, they must notify ASSA ABLOY's head office in Stockholm, Sweden, via mail Box 70340 SE-107 23 by filling out the form used in Appendix I of the Code of Conduct.

Information provided by employees will be treated confidentially, and ASSA ABLOY will not tolerate any retaliation for reporting possible violations of the Code in good faith.

Any violation of the Code will be promptly investigated, using reports of irregularities responsibly and not misused to direct insults, slurs, or other criticism against another person without incriminating evidence.

Whistleblowers must provide only such information as they are convinced, to the best of their knowledge and belief, to be true.

13. SUPERVISION AND MONITORING

The Compliance Officer and the Legal Representative shall monitor the Transparency and Business Ethics Manual at least every two years to ensure compliance with the policies and regulations mentioned therein. The monitoring shall be carried out through the International Supply Chain Risk Identification and Management Matrix, training, Due Diligence, and compliance officer's reports, among others. The result of the monitoring shall be reported to the Shareholders' Meeting.

13.1. INDICATORS

TYPE OF INDICATOR	PERSON RESPONSIBLE FOR MEASURING	FORMULA	GOAL	PERIODICITY
Efficiency	Compliance Officer	Total number of people trained in PTEE/ Total ASSA ABLOY employees	> 95%	Annual
Informative	Compliance Officer	Total unusual transactions reported	< 5	Annual

Effectiveness	Compliance Officer	Total suspicious transactions	0	Annual
Efficiency	Human Resources	Number of high-risk employees with intensified due diligence per day/ Number of high-risk employees	100%	Semi-annual
Efficiency	Commercial and Portfolio	Number of high-risk customers with intensified due diligence per day/ Number of high-risk customers	100%	Semi-annual
Efficiency	Purchases	Number of high-risk suppliers with intensified due diligence per day/ Number of high-risk suppliers	100%	Semi-annual
Efficiency	Board of Directors	Number of high-risk partners or shareholders with intensified due diligence per day/ Number of high-risk partners or shareholders	100%	Semi-annual
Efficiency	Compliance Officer and Counterparty Manager	Number of information pieces in PTEE and SAGRILAF* *SAGRILAF: self-monitoring and comprehensive risk management system for money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction	<u>≥ 6</u>	Annual

14. UPDATES

Updates to this Transparency and Business Ethics Manual and its Policies defined by the Code of Conduct will be made every two years or as changes emerge in the company's economic activity, updates in the regulations by the Superintendency of Companies, and other variables that may cause a change or update in the management of the risk of corruption and transnational bribery.

15. DOCUMENT RETENTION

The integrity of ASSA ABLOY's reporting and records management systems is of the utmost importance. Employees shall take the utmost care to ensure that records are prepared and reviewed as accurately as possible, whether for internal or external use. Employees shall apply the accounting standards and controls as described in the corporate manual and follow the company's procedures for retaining and using records.

In addition, the Transparency and Business Ethics Manual and the policies implemented to ensure compliance will be translated for counterparties, as necessary, to develop business relationships.

16. PENALTIES

In the event that ASSA ABLOY identifies any act of corruption or transnational bribery by its counterparties, the company will apply the respective sanctions, which may include

penalties, administrative sanctions, or criminal sanctions depending on the seriousness of the situation and may also result in the termination of the business or employment relationship with ASSA ABLOY. In the case of employees, sanctions will be imposed in accordance with the provisions of the Internal Work Regulations and the Code of Conduct.