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Version No. 02

# **BUSINESS ETHICS PROGRAM**

## **COMPLIANCE MANUAL**

**Unilever Andina Colombia Ltda**  
**Bogota, Colombia**  
**July - 2025**

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### **Table of Contents**

<b>Theme</b>	<b>Pag.</b>
1. General considerations	3
2. Definitions	4
3. Principles for Mitigating the Risks of Transnational Bribery	7
4. Sanctions	17
5. Validity	18
6. Archiving and Conservation	18

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## 1. General Considerations

**Our commitment:** Unilever's commitment to doing business with integrity requires consistently high global standards: our zero-tolerance approach to bribery and corruption applies to all Unilever operations, regardless of local business practices, and absolutely prohibits public and commercial bribery, local or cross-national.

Unilever Andina Colombia Ltda. ("Unilever"), is committed to doing business with integrity and a policy of zero tolerance towards corruption, complying with the budgets aimed at combating and preventing National and Transnational Bribery, contemplated in Colombian legislation and especially in: (i) Law 1474 of 2011, (ii) Law 1778 of 2016, (iii) Resolution 100-006261 of 2020. issued by the Superintendence of Companies (iv) External Circular No. 100-000011 of August 9, 2021 issued by the Superintendence of Companies.

In addition, Unilever will comply with all international agreements signed by Colombia, including the Inter-American Convention against Corruption of the Organization of American States of 1997, the United Nations Convention against Corruption (UNCAC) of 2005, and the Convention of the Organization for Economic Cooperation and Development (OECD) to Combat Bribery of Foreign Public Servants and Foreign Public Entities in the United States. International Business Transactions 2012.

Unilever currently has a robust and comprehensive compliance system that is comprised of a Code of Business Principles and Code Policies, as well as other Compliance Policies, (collectively the "Program").

The Programme is directly applicable to all shareholders, officers, employees, Contractors, and other third parties linked in any way to Unilever. The effective implementation and

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execution of the Programme by its recipients is aimed at compliance with the Anti-Corruption Provisions and the implementation of Unilever's commitment to do business with integrity.

In compliance with the commitments, Unilever carried out an assessment and diagnosis of the risks of acts of Transnational Bribery within Unilever, as well as in the industries and economic sectors in which it participates, in order to detect the main sources of risk and design and implement the relevant mechanisms to prevent, mitigate and sanction their occurrence.

## **2.Definitions**

**2.1. Business Integrity:** Refers to the area of Unilever responsible for receiving, prosecuting, investigating, registering, and reporting to the Business Integrity Committee/Business Ethics Committee any case of suspected Corruption and transnational bribery, or any breach of the Code of Business Principles and its Policies. He is also responsible for the communication and training of the Code of Business Principles, Code policies, and this Program.

**2.2. External Circular 100-000011:** Fully modifies External Circular No.100-000003 of July 26, 2016 and adds Chapter XIII of the Basic Legal Circular of 2017.

**2.3. Business Integrity Committee/Business Ethics Committee:** Unilever's entity made up of members of the Board of Directors, whose responsibility is to execute all the functions of the Board of Directors related to the proper functioning of the Business Ethics Program and Compliance Policies.

**2.4. Contractor:** Any third party that provides services to Unilever, or that has a contractual legal relationship with Unilever of any nature, other than an employment relationship.

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**2.5. Due Diligence:** Periodic review of the legal, accounting and financial aspects related to a national or international business or transaction, the purpose of which is to identify and assess the risks of bribery and corruption that may affect Unilever and its contractors.

**2.6. Anti-Corruption Provisions:** These are: (i) Laws 1474 of 2011 and 1778 of 2016, and those that add, modify or complement them; (ii) Resolution 100-006261 of 2020 and External Circular 100-000011 of 2021 issued by the Superintendence of Corporations, and those provisions that modify or complement them; (iii) the international treaties signed by Colombia, including the Inter-American Convention against Corruption of the Organization of American States of 1997, the United Nations Convention against Corruption (UNCAC) of 2005, and the Convention of the Organization for Economic Cooperation and Development (OECD) on Combating Bribery of Foreign Public Officials in International Business Transactions of 2012; (iv) the *U.S. Foreign Corrupt Practice Act (FCPA)*; and (v) the *U.K.'s UK Bribery Act 2010*.

**2.7. Compliance Officer:** A natural person appointed by the Board of Directors to lead and manage the Transnational Bribery Risk Management System.

**2.8. Decision-making, management and compliance entities:** Unilever's directors and associates are responsible for: (i) Shareholders' Meeting (ii) General Shareholders' Meeting (iii) Board of Directors (iv) Legal Representatives and (v) The Business Integrity Committee/Business Ethics Committee.

**2.9. Business Ethics Program:** Corresponds to the specific processes that oversee the Compliance Officer, aimed at executing compliance policies in order to identify, detect, prevent, manage and mitigate the risks of Transnational Bribery, as well as others that are related to any act of corruption that may affect Unilever.

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**2.10. Foreign Public Servant:** By virtue of the provisions of the first paragraph of the second article of Law 1778 of 2016, it is considered "For the purposes of the provisions of this Article, a foreign public servant is considered to be any person who holds a legislative, administrative or judicial position in a State, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of whether the individual has been appointed or elected.

A foreign public servant is also considered to be any person who exercises a public function for a State, its political subdivisions or local authorities, or in a foreign jurisdiction, whether within a public entity, or a state owner enterprise or an entity whose decision-making power is subject to the will of the State, its political subdivisions or local authorities. or from a foreign jurisdiction. Likewise, it shall be understood that any official or agent of an international public organization holds the status

**2.11. Transnational Bribery:** It is the act by virtue of which Unilever, through its employees, contractors, administrators or associates; gives, offers or promises to a Public Servant or Public Entity abroad, directly or indirectly: (i) sums of money, (ii) any object of pecuniary value or (iii) other benefit or utility, in exchange for making, omits or delays any act related to his or her duties and in connection with an international business or transaction.

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### **3. Principles for Mitigating the Risks of Transnational Bribery**

#### **3.1 Management Engagement in Preventing Transnational Bribery**

Unilever's Directors are committed to promoting a culture of business development with transparency, honesty, accountability, and integrity, and observance of the Law and the highest ethical principles. Through the Decision-Making, Management and Compliance Entities, Unilever's Directors promote and support the proper functioning of the Business Ethics Programme as a risk management system for Transnational Bribery and Corruption.

In accordance with the above, the members of the Decision-Making, Management and Compliance Entities have within their general functions the obligation to implement the Compliance Policies, through the application of the following actions:

**3.1.1.** To take a strong position in the prevention of Transnational Bribery, for Unilever to conduct its business in an ethical, transparent and honest manner.

**3.1.2.** Guarantee the supply and achievement of the necessary infrastructure required by the Compliance Officer for the execution and fulfillment of his functions.

**3.1.3.** Take appropriate action against any Unilever officer if he or she breaches the provisions of the Business Ethics Programme.

**3.1.4.** Structure an effective communication strategy to inform all employees and Contractors of the Business Ethics Program.

The specific functions of the Decision-making, Management and Compliance Entities are attached as *Annex 1* to this Business Ethics Programme.

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### **3.2 Assessment, Management and Control of Risks Related to Transnational Bribery.**

The assessment, management and control of Transnational Bribery risks is the central axis of the Business Ethics Program, developed in a manner proportional to the size, nature, structure, countries of operation and current conditions of Unilever's activities.

The diagnosis was carried out in all areas of Unilever's internal operations, identifying the following as exposed to the risk of the commission of Transnational Bribery conduct: (i) import processes, (ii) export processes, (iii) regulatory affairs, (iv) corporate affairs and (v) acquisitions.

To this end, a Transnational Bribery Risk Matrix was developed in the aforementioned areas of internal operation, based on the following evaluation criteria:

**3.2.1.** The risk, Unilever, the country and the area in which the Transnational Bribery conduct may occur.

**3.2.2.** The cause of the risk, its frequency and the possible warning signs that will warn the moment in which a Transnational Bribery conduct is being executed.

**3.2.3.** The type of specific control to prevent the occurrence of the act, and the responsible position.

**3.2.4.** The residual risk, the impact and the probability of acts of bribery with foreign officials or public entities.

The diagnostic process through which the risks of Transnational Bribery were identified, together with the risk matrix and risk assessment criteria, are attached as *Annex 2* to this Business Ethics Program.



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### **3.3 Compliance Officer**

In order to ensure the correct and adequate implementation, execution and monitoring of this Business Ethics Program, the Unilever Board of Directors appointed a Compliance Officer to manage and control the risks of Acts of Corruption. The Compliance Officer is an employee of Unilever and performs the functions of his or her position, which are in accordance with applicable national legislation on Transnational Bribery.

The Compliance Officer enjoys the highest qualities of suitability, responsibility, experience, leadership, and character that allow him to perform his functions properly. In addition, he holds a position corresponding to the third hierarchical level within Unilever, having decision-making capacity and knowledge of experience in risk management. It also has a high level of ethics and responsibility.

The Compliance Officer is trained by Unilever for the administration and proper functioning of the Business Ethics Programme. Likewise, it has an immediate relationship with Unilever's executives, and at the same time, it has complete availability for employees and Contractors, so that they can manifest situations that may constitute Acts of Corruption in a timely and adequate manner. Its functions are:

**3.3.1.** To promote within Unilever, a culture of corporate ethics in compliance with the Anti-Corruption Provisions, and an awareness of the obligation and compliance with this Programme.

**3.3.2.** To direct the design and execution of the Business Ethics Program, ensuring effective compliance by all persons who are linked to Unilever.

**3.3.3.** Implement the Compliance Policies of the Business Ethics Program.

**3.3.4.** Request periodic assessments of the risks faced by Unilever. The purpose of the evaluation process will be to validate previously identified risks, as well as new risks that arise

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with the development of the business. The foregoing may be carried out within Unilever, or through external advisors hired for this purpose.

**3.3.5.** Design and implement programs of dissemination, training and training to employees and Contractors on the Business Ethics Program.

**3.3.6.** Address the doubts and concerns of employees and Contractors about the interpretation and application of the Business Ethics Program.

**3.3.7.** Ensure the proper functioning of the whistleblowing channels, in order to receive notifications from users or any person outside Unilever, regarding any suspicion or indication of an act of Transnational Bribery.

**3.3.8.** To process investigation processes within Unilever, in the event that there are suspicions of possible violations of the provisions of the Business Ethics Program or acts of Transnational Bribery.

**3.3.9.** Make a list of the complaints submitted through the corresponding channels. In the event that such reports have opened an internal investigation, the Compliance Officer shall indicate the reasons for the investigation, the procedures used and their results.

**3.3.10.** Immediately inform the Business Integrity Committee/Business Ethics Committee about any violation of the Business Ethics Program.

**3.3.11.** Submit a detailed report on its management to the Business Integrity Committee every (3) months.

### **3.4 Due Diligence**

The Compliance Officer delegated to internal employees and third parties that he chose at his discretion, the responsibility of conducting a periodic review of current or potential Unilever Contractors, with the aim of validating their adherence to the Partners' Responsibility Policy (*Annex 4*) as well as identifying and evaluating possible risks of

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Transnational Bribery involving all the relationships that Unilever establishes with third parties.

The objectives of the study are to identify contingencies related to possible acts of transnational bribery in the context of Unilever's international operations and acts of corruption with respect to the relationship they may have with public officials. Including the following:

**3.4.1.** To estimate the specific conditions of each of the Contractors with which Unilever has a relationship, in order to identify their reputation, and in turn, the relationship they may have with third parties, especially those links in which foreign officials or public entities are involved. Likewise, within the process, current and future Contractors will be taken into account, as well as individuals who provide services under any legal figure.

**3.4.2.** Identify that the payment made to Contractors obeys the conditions of the market, ruling out the delivery of additional money to officials or public entities abroad as a bribe.

**3.4.3.** Warn the Compliance Officer in the event that the reputation of the Contractors contains a high degree of exposure to the risk of Transnational Bribery.

**3.4.4.** Include express contractual clauses with Contractors who have a high degree of exposure to the risk of Transnational Bribery, including their obligation to comply with the rules related to the prevention of Transnational Bribery and the Transnational Bribery Programme.

Unilever Business Ethics, as well as the power to unilaterally terminate the contract in the event of non-compliance by the Contractor.

**3.4.5.** Identify the liabilities and contingencies related to the merger and purchase of assets, shares, quotas or parts of interest in corporate restructuring processes in which Unilever participates as a possible acquirer.

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### **3.5. Control and supervision of the Compliance Policies and Ethics Program**

The Company has an audit and control system designed to ensure compliance with the parameters and procedures set forth in the Business Ethics Program.

In addition to the processes aimed at complying with this Business Ethics Program, Unilever has a Code of Business Principles, which is supervised by the Business Integrity area. In addition, Unilever has other Compliance Policies, which are under the control and supervision of the areas responsible for each process, among which are the following:

**3.5.1. Delivery of gifts or hospitality to third parties:** Employees must not discuss, offer, or deliver any gift or hospitality involving Public Servants or their families, without having previously made and obtained a written response to the respective disclosure. (*Annex 3*).

**3.5.2. Remuneration and payment of commissions to Contractors:** Any remuneration and payment of commissions to Contractors shall be made in accordance with the parameters set forth in the Business Partner Responsibility Policy; the Anti-Bribery Policy; the Anti-Money Laundering and Economic Sanctions Policy; the Accurate Records, Reporting and Accounting Policy and the procedures of the Procurement area. the *No Purchase Order (PO) No Pay* Policy, all of which are attached as Schedules to this Program.

**3.5.3. Employee expenses:** Unilever has established rules to regulate business travel expenses, which involve transportation, accommodation, food and travel costs, among others; the trips of those employees who have to travel for work reasons outside their country or home city, are called *Home Leave* or *Relocation Trips*.

**3.5.4 Remuneration and payment of commissions to employees:** Unilever has a documented and previously defined Benefits Plan which is applicable according to the salary range and the Work Level, the benefits are divided between Legal Benefits, Extralegal

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Benefits, Life Plan and Development and Well-being. At Unilever, salary ranges are established for all Work Levels, and at some levels they can be divided into salary zones with a corresponding range for each. Promotional raises are defined as professional growth to a higher job level or within the same level to a higher job position. Any exceptions to the wage/incentive/reward standards must be approved by the Rewards Manager.

**3.5.5. Participation in Politics:** It is forbidden to support or contribute to political parties or their candidates, without exceptions. Unilever employees may only offer support and contributions to political parties on a personal basis (*See Code of Business Principles – Annex 3*).

**3.5.6. Donations:** The Company understands that, in general terms, donations constitute a source of risk for the commission of Acts of Corruption. However, Unilever considers donations to be an essential part of Unilever's solidarity role in society. To this end, and in order to preserve legality and transparency in its execution, it is essential to fully comply with the strict procedures established in the Donation Process (Annex 8).

The Company understands that, in general terms, donations constitute a source of risk for the commission of Acts of Corruption. However, Unilever considers donations to be an essential part of Unilever's solidarity role in society. To this extent and in order to preserve legality and transparency in its execution, it is essential to fully comply with the strict procedures established in the Donation Process (Annex 8), all donations must be executed in accordance with the provisions of the Authorities Manual (TOA) in force on the date on which the donation is carried out and the Business Integrity Global Donation Process.

**3.5.7. Cash Handling:** It is prohibited to deliver or receive cash payments with Contractors.

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**3.5.8. Management of virtual assets:** Unilever does not trade or transfer virtual assets understood as the digital representation of value that can be traded or transferred digitally and can be used for payments or investments.

**3.5.9 Additional Duties of Employees: Employees** must:

1. Always make it clear, internally and when dealing with third parties, that Unilever has a zero-tolerance approach to bribery and corruption and will not offer (directly or indirectly), pay, seek or accept a payment, gift or favour to improperly influence a business outcome.
2. Immediately notify your Business Integrity Officer and Legal if they become aware of any suggested or actual payment or other transaction that may be contrary to our zero tolerance for corruption policy
3. Follow Unilever's third-party compliance policies and controls.
4. Use electronic communications or e-government solutions (in areas such as licensing, procurement, taxation, brand protection, etc.) or any other means available to reduce in-person interactions with public officials and risks related to soliciting bribes
5. Employees must not, directly or indirectly (e.g., through suppliers, agents, distributors, consultants, lawyers, intermediaries, or any other person). Nor shall they offer or give bribes or improper advantages (including facilitation payments) to any public official or other person or third party that is intended, or appears to be intended, to influence a person's decisions about Unilever.
6. Employees are absolutely prohibited from soliciting or giving bribes or undue advantages from any third party, which are intended or give the impression that they may be intended to influence Unilever's decisions about that third party

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### **3.6 Disclosure of Compliance Policies and Business Ethics Program**

The knowledge, understanding and application of the Business Ethics Program by each of the employees who are directly or indirectly linked to Unilever, is a process that is in charge of the Compliance Officer and the Management, Administration and Compliance Entities .

The communication strategy includes mass e-mails to disseminate this Program, as well as training for employees and contractors exposed to the risk of incurring or being part of corrupt conduct. The application of all communication strategies is implemented through physical and virtual channels, available in different languages for all those who are part of Unilever.

Anti-corruption trainings are conducted at least (1) annually to all Unilever employees, with the aim of training employees in knowledge of and compliance with Unilever's Compliance Policies.

The Business Ethics Programme training courses are held at least (1) once a year, or in the event that the Business Ethics Programme or Compliance Policies are substantially modified, and are aimed at Unilever's internal functions that, in accordance with the risk diagnosis and matrix (*Annex 2*) are exposed to Transnational Bribery risks.

The content of the training processes is determined by the profile of the receiving team, and they focus primarily on how situations that go against the Program or Unilever's Compliance Policies can be perceived. In addition, the training courses include raising awareness of the benefits of applying to a culture sponsored by legality and integrity, as well as the reporting channels in case of suspected violations, and the sanctioning consequences of violating the Compliance Policies and Anti-Corruption Provisions.

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### **3.7 Internal Whistleblowing Channels**

The reporting channels are those means of communication that Unilever has provided so that its employees and Contractors can report situations that violate the budgets established in the Business Ethics Program and the Compliance Policies.

For this purpose, Unilever makes available the direct report to the Compliance Officer, the internal Business Integrity function, the Business Integrity Committee/Business Ethics Committee or the Board of Directors. In addition, it enabled the Confidential Ethics Line and the Website, means through which, anonymously, employees and Contractors can report any improper conduct that may constitute or that constitutes an Act of Corruption. People who make use of these reporting channels will be protected against any type of retaliation that may be carried out against them.

In turn, through the same reporting channels, employees and Contractors can make inquiries about specific cases on the application of the Program or get advice for decision-making in situations of attempted Acts of Corruption.

Complaints made through the reporting channels are received by a third party external to Unilever and immediately transmitted to the Compliance Officer and the internal Business Integrity function, against which a confidential internal investigation is initiated in accordance with *Annex 11*. The findings of the research are presented to the Business Integrity Committee/Business Ethics Committee for analysis, discussion and decision.

The means envisaged for this purpose are:

Phone: (601) 3816583 or 018005182216

Website: [www.unilevercodesupportline.com](http://www.unilevercodesupportline.com)



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### **3.8 External Reporting Channels**

In accordance with the provisions of Law 1778 of 2016, which establishes the administrative liability of legal entities and branches of foreign companies for transnational bribery conduct, the Superintendence of Companies makes available to the general public a whistleblowing channel to inform the entity of any fact or situation related to the alleged transnational [bribery conduct](https://www.supersociedades.gov.co/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional)<https://www.supersociedades.gov.co/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional>. Additionally, in the event that you become aware of an event of possible corruption, you can file a complaint through the following link enabled by the Secretariat of Transparency of Colombia <https://portal.paco.gov.co/index.php?pagina=denuncie>

### **4. Sanctions**

Failure to comply with this Business Ethics Programme by any of the employees or Contractors is classified as a serious misconduct and gives rise to the application of the sanctions established in the contracts, in the internal regulations of Unilever and in the sanctioning provisions stipulated in the Code of Business Principles. In the event that the following discriminatory behaviors are carried out:

- 4.1.** Failure to comply with this Business Ethics Program or the Anti-Corruption Provisions.
- 4.2.** Are aware of any conduct contrary to this Business Ethics Program or the Anti-Corruption Provisions and do not report them through the complaint channels.

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Failure to comply with the Business Ethics Program by the Contractors entitles Unilever to enforce the anti-corruption clauses included in the contracts signed, being able to apply the corresponding penalties or carry out the unilateral termination.

The process for internal investigations is attached as *Annexes 9 and 10*.

### **5. Validity**

This Business Ethics Program came into force as of March 31, 2017, and its modifications will come into force as of the date of disclosure. It will be available for consultation by third parties and employees linked to Unilever.

### **6. Archiving and Conservation**

All documents and supports on the execution and compliance of this Program, such as: (i) internal documents, (ii) external reports from competent authorities, (iii) evidentiary material collected during investigations, (iv) minutes of the Board of Directors, (v) authorizations from the Directors on the Program, among others, are kept and kept in archives for a period of five (5) years from the date of their production or occurrence. Once this period of time has expired, the documents and physical supports will be destroyed, guaranteeing their exact reproduction in digital technical media.

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## **7. Annexes**

1. **Annex 1:** Manual of functions and responsibilities of the decision-making, execution and compliance entities: (i) The Board of Directors (ii) The Business Integrity Committee/Business Ethics Committee, (iii) The Legal Representative (iv) The Shareholders' Meeting and (v) The General Shareholders' Meeting.
2. **Annex 2:** Risk diagnosis report and risk management and control matrix for the prevention of Transnational Bribery conduct.
3. **Annex 3:** Code of Business Principles and its Policies.
4. **Annex 4:** Members' Responsibility Policy.
5. **Annex 5:** Red flags mitigation guide.
6. **Annex 6:** Procurement Procedures
7. **Attachment 7:** No Purchase Order (PO No Pay) *Policy*
8. **Annex 8:** Donation Process

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## **Annex 1**

Manual of functions and responsibilities of the decision-making, execution and compliance entities : (i) The Board of Directors (ii) The Business Integrity Committee/Business Ethics Committee, (iii) The Legal Representative (iv) The Shareholders' Meeting and (v) The General Shareholders' Meeting:

### **General Shareholders' Meeting:**

- To appoint the members of the Board of Directors.

### **Shareholders' Meeting:**

- To dignify the members of the Direct Board.

### **Board of directors:**

- To appoint the members of the Business Integrity Committee/Business Ethics Committee.
- Delegate to the Business Integrity Committee/Business Ethics Committee the receipt and evaluation of the quarterly report to be submitted by the Compliance Officer in relation to the Company's risk situation and the implementation and execution of the Program.
- Delegate to the Business Integrity Committee/Business Ethics Committee the analysis of the investigations, findings, and risks of cases on suspicions of Acts of Corruption and transnational bribery, and the imposition of sanctions and/or necessary preventive and corrective actions.
- Provide effective, efficient, and timely support to the Business Integrity Committee/Business Ethics Committee and the Compliance Officer for the exercise of their duties in relation to the Program.

### **Business Integrity Committee/ Business Ethics Committee:**

- Approval of the Business Ethics Program and any modification thereto, including for this purpose the inclusion of new procedures derived from the detection of possible risks of acts of corruption in the opening of new operations and/or jurisdictions.
- Supervise compliance with the Business Ethics Program.
- The analysis of the investigations, findings, and risks of cases on suspicions of Acts of Corruption and transnational bribery, and the imposition of sanctions and/or necessary preventive and corrective actions.

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- The receipt and evaluation of the quarterly report to be submitted by the Compliance Officer in relation to the Company's risk situation and the implementation and execution of the Business Ethics Program.
  - Designate, remove, and evaluate the Compliance Office.
  - The receipt and evaluation of the annual Compliance Plan to be presented by the Compliance Officer.
  - Order the presentation of reports to the corresponding authorities, in cases in which violations of the Business Ethics Program and/or the Anti-Corruption provisions are presented.

**Legal Representative:**

- Ensure compliance with the Business Ethics Program.
  - To disclose the existence of the Business Ethics Program and the Code of Principles, Duties and Prohibitions with employees, Contractors and others linked to the Company.
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- Adopt and implement the measures ordered by the Board of Directors in relation to possible violations of the Business Ethics Program, including the initiation of legal actions.
  - Authorize and provide the necessary resources for the proper implementation and compliance of the Business Ethics Program. At the request of the Compliance Officer or the Board of Directors, integrate the necessary staff or enter into the necessary contracts with external advisors, in order to comply with the purposes of the Business Ethics Program, and carry out the audits that are ordered by the Business Integrity Committee/Business Ethics Committee.
  - Continuously support the Business Integrity Committee/Business Ethics Committee and the Compliance Officer in all the functions imposed on them by the Program.