

**SUBJECT:** MEASURES TO ENSURE COMPLIANCE WITH THE PROVISIONS OF CIRCULAR 029 OF 2014, ISSUED BY THE FINANCIAL SUPERINTENDENCE OF COLOMBIA

**DATE:** FEBRUARY 27, 2023

In compliance with the legal provisions in force, and especially with the provisions of the Title I of the Part III of the Basic Legal Circular Letter (External Circular 029 of 2014) of the Financial Superintendence of Colombia, Construcciones El Cóndor S.A. informs that its Board of Directors has established the following measures to comply with the provisions of the aforementioned circular and ensure the effective participation of all Shareholders in the ordinary meeting of the General Shareholders' Meeting to be held on March 31, 2023:

1. Grant Shareholders fair and equal treatment.
2. In the notice of citation to the Ordinary Meeting of the Shareholders Assembly, shareholders will be informed that the representations and proxies should abide to articles 184 and 185 of the Colombian Commerce Code.
3. Precise instructions have been given to the Legal Manager of the Company to review, during the General Assembly to be held on March 31st, 2023, the compliance of the articles 184 and 185 of the Colombian Code of Commerce and of the Chapter Sixth of the Title I of the Part III of the Basic Legal Circular Letter (External Circular 029 of 2014) of the Financial Superintendence of Colombia

Consequently, the duty of the Legal Manager, as Secretary of the Company is:

- a. To review the proxies granted by shareholders and return those which do not strictly comply with the demands contained in article 184 and 185 of the Colombian Code of Commerce and/or in Chapter Sixth of the Title I of the Part III of the Basic Legal Circular Letter.



## RELEVANT INFORMATION

- b. To return those proxies which do not comply with the instructions set forth in Chapter Sixth of the Title I of the Part III of the Basic Legal Circular Letter.
  - c. To inform that shareholders are entitled to be represented in the Assembly by appointing a proxyholder, underlining the importance of avoiding conducts that go against articles 184 and 185 of the Colombian Commerce Code, and of article 23 of Act 222 of 1995.
  - d. To reaffirm to the directors and employees of the Company the provisions contained in Chapter Sixth of the Title I of the Part III of the Basic Legal Circular Letter, and the need to strictly comply with its contents. The above led to the publication of information in several in-house communications channels of the Corporation.
  - e. To provide a sample of the proxy to shareholders on the Corporate Web, which shall be available as well on the date of the Assembly of Shareholders.
4. During the meeting of the Board of Directors No. 392 held on February 27, 2023, directors were reminded of the importance of strictly complying with the aforementioned circular, with special emphasis on the following prohibitions, aimed at all company employees:
- a. To suggest to the Company's shareholders the granting of Powers where the name of the proxyholder who will be attending the Shareholders Assembly in representation does not appear clearly defined.
  - b. To receive Powers for the General Shareholders Meeting where the proxyholder's name does not appear clearly defined.
  - c. To admit as valid, Powers without the full requirements established in the Article 184 of the Commercial Code.
  - d. To suggest to the Company's shareholders the name of proxyholders for the General Shareholders Meeting.
  - e. To recommend to the Company's shareholders to vote for a particular list.



## RELEVANT INFORMATION

- f. Suggest, coordinate, agree with any shareholder or with any shareholder representative, the presentation in the Assembly of proposals to be submitted for their consideration.
- g. Suggest, coordinate, agree with any shareholder or with any shareholder representative, voting in favor or against any proposition which is presented during the meeting.

