

	COMUNICADO	Código: COM AI 01
	NOTICE TO FOREIGN SUPPLIERS AND CUSTOMERS OF WIN SPORTS S.A.S.' IMPLEMENTATION OF THE BRIBERY AND CORRUPTION RISK ASSESSMENT PROGRAM (PTEE)	Versión: 1.0 Fecha Vs: 2023-01-01
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We kindly inform you that by virtue of the provisions of Chapter XIII of Basic Legal Circular 100-00008 of July 12, 2022 issued by the Superintendencia de Sociedades de Colombia (Colombian Superintendence of Companies), WIN SPORTS S.A.S., obtained the status of Obligated Company to the implementation of the ABAC Risk Assessment Program (PTEE as the abbreviation of Programa de Transparencia y Ética Empresarial).

As mentioned before, the Company has implemented the PTEE within the framework of its compliance obligations. For this reason, WIN SPORTS S.A.S.'s Board of Directors approved an ABAC risk assessment and appointed a Compliance Officer to direct and supervise its operation.

The structure of the PTEE is the following:

- Scope.
- Principles and Objectives of the Bribery and Corruption Risk Assessment Program.
- Corporative structure and its obligations on the assessment of Bribery and Corruption Risks.
- Behaviors and conducts against transparency and business ethics.
 - Bribery.
 - Corruption.
 - Conflicts of interest.
 - Information requested by shareholders.
 - Relations with public entities.
 - Improper payments.
- Standards on Bribery and Corruption Risk Assessment.
 - Travel Expenses and Gifts and Invitations offerings and receiving.
 - Political activities.
 - Donations.
 - Agreements and ABAC clauses.
 - Accounting information.
- Specific proceedings of the Compliance Officer.
 - Bribery and Corruption mitigation stages (identification, measuring, control and monitoring).
 - Red flags.
 - Bribery and Corruption Risk Assessment and Evaluation.
 - Reports on transparency and business ethics and whistleblowers.
 - Breach of the PTEE.
 - Training.
 - Standards on document retention.

In case any supplier or costumer of Win Sports S.A.S. intends to present any information related to the breach of the Company's PTEE, the Whistleblower Channel is the Compliance Officer's email, as follows: oficialcumplimiento@winsports.com.co.