



PROGRAMA DE ÉTICA EMPRESARIAL

••• Nuestro ADN: hacer las cosas bien •••

ETHICS COMMITTEE REGULATIONS

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TABLE OF CONTENTS

GLOSSARY	3
1. Objective	3
2. Members	13
3. Responsibilities	13
4. Frequency of the meeting.....	14
5. Due Process.....	14



GLOSSARY

For the purposes of these regulations, the terms capitalized throughout the text will have the meaning assigned to them below, whether they are used in singular or plural. The proper names of the corporate bodies and areas of Pei AM are excepted from the above, which in turn are transcribed throughout these regulations with an initial capital letter:

Government Agreements: These are the agreements that are signed between the shareholders of Pei AM, to regulate the majorities and mechanisms for decision-making and in general the governance guidelines of Pei AM, among others, including but not limited to the shareholder agreements of Pei AM or its controlling or related companies.

Unfair Administration: refers to the event in which a Director, Collaborator or external advisor for his own benefit or that of a third party, abusing the functions inherent to his position, fraudulently disposes of Pei AM's assets or incurs obligations on its behalf without authorization, causing harm to Pei AM.

Administrators: The administrators are the legal representative, the liquidator, the factor, the members of the boards or management councils and those who, in accordance with the statutes, exercise or hold these functions.

Anonymous: refers to unknown authorship and no data that could lead to information about the authorship of a Report. Anonymity will not be compromised by the assignment of a code or other designation with which a person can communicate without revealing his or her identity.

Self-control: Under the scope of SAGRILAF, it is Pei AM's will to manage the risks related to ML/TF and implement the relevant action plans to control and mitigate them efficiently.

Complaint Base: means the document in which the Complaints received through the Ethics Mailbox due to non-compliance with the Code of Conduct, the Manual for the Prevention and Control of Money Laundering / Terrorism Financing (ML/TF) Risk, the Anti-Corruption Policy or any other document that is part of the Pei AM Business Ethics Program are recorded.

Final or Real Beneficiary: refers to the natural person(s) who ultimately own(s) or control(s) a Counterparty, or the natural person on whose behalf a transaction or business is carried out. It also includes the person(s) who exercise ultimate effective control over a legal person or other legal structure or is/are the owner(s) of 25% or more of its capital, in the case of a corporate nature.

Brokers: refers to third-party intermediaries for obtaining Clients or business for Pei AM, who receive a commission, payment or percentage (fixed or variable) in return for said work.

Ethics Mailbox: complaint [email buzonneticoPEI@deloitte.com](mailto:buzonneticoPEI@deloitte.com) arranged by Pei AM and operated by Deloitte as an independent third party, to report situations relating to non-compliance with the Code of Conduct, the Manual for the Prevention and Control of ML/TF Risk and the Anti-Corruption Policy.

Safeguard Clause: refers to those clauses that must be included in all contracts entered into by Pei AM, which have the purpose of preventing and controlling ML/TF risks in Pei AM's contractual relationships.

Customer: refers to those persons, natural or legal, public or private, with whom Pei AM, in the exercise of its corporate purpose, signs agreements or contracts of lease, concession, loan, sale and/or any other figure, by virtue of which these properties are delivered by Pei AM.

Code of Conduct: It is the internal document of Pei AM that defines the framework for interaction between Pei AM Collaborators and its different Interest Groups.

Contributors: refers to all persons who are linked to Pei AM through an employment contract.

Key employees: Refers to Pei AM collaborators at the Executive Management, Presidency, Vice-Presidencies, Management and Directorship levels, who as part of their functions: i) administer and execute Pei AM financial resources; ii) manage the treasury; iii) carry out accounting and financial activities; iv) manage relationships with Clients, tenants, Brokers, strategic allies and in general are dedicated to commercial activity; v) lead processes of supply of goods and services and of linking or contracting of Suppliers to Pei AM; vi) have relationships with state entities and/or Public Officials in order to obtain permits, licenses and in general manage regulatory activities required by Pei AM projects; vii) those who are in Internal Control and Audit positions; viii) those who control and manage the processes of linking Key Collaborators; and ix) those who manage legal, ethical, prevention of Prohibited Conduct and ML/TF matters.

Audit Committee: This Committee is responsible for supervising the management and effectiveness of the internal control system, monitoring the independence and objectivity of the internal auditor, defining and following up on the internal audit plan, and evaluating the findings from audit results and the action plans implemented. The Audit Committee is composed of the Executive Director of Pei AM and the Internal Auditor.

Ethics Committee: This corporate body is responsible for ensuring compliance with the Code of Conduct, supervising and managing complaints made through the Ethics Mailbox, resolving Conflict of Interest situations involving the Real Estate Administrator's employees, initiating investigations, and defining the course of action for potential violations of the Corporate Transparency and Ethics Program. It is composed of the President, the Legal Director, and the Human Resources Manager. The Compliance Officer attends with a voice but no vote when the matters under discussion are related to their duties.

Communities: refers to groups of people, state entities and non-profit entities (e.g. foundations, corporations, associations, etc.) that are located and linked, by common characteristics and interests, to the areas where the real estate projects or properties that Pei AM manages are located.

Prohibited Conduct: refers jointly to the following conduct: Disloyal Administration, Public Corruption, Private Corruption, Fraud, Transnational Bribery, Influence Peddling, Improper Use of Privileged Information, Money Laundering, Financing of Terrorism and any other conduct that contravenes the provisions of the manuals, policies and other Corporate Good Practice Policies, the Code of Conduct, Colombian regulations or that is considered inappropriate or inadequate in accordance with the provisions of the contract or agreement that regulates the relations between the third party and Pei AM, custom and good judgment.

Background Check: It is the study carried out by a specialized firm with the aim of establishing, based on public records and databases, at least the existence of: (i)



judicial, sanctioning, coercive or administrative proceedings of any kind, including but not limited to those related to Prohibited Conduct; (ii) accounts payable in favor of state entities; (iii) inability to formalize transactions or contracts; (iv) corporate reorganization, bankruptcy or liquidation processes; and (v) asset forfeiture processes.

Counterpart(s): refers to any natural or legal person with whom Pei AM has commercial, business, contractual, legal or any other type of ties. Counterparties include, among others: shareholders, partners, collaborators, clients and suppliers of goods or services.

Control(s): refers to the use (implementation) of mechanisms such as policies, procedures and other actions that allow minimizing the probability of occurrence or level of severity of risks related to ML/TF in Pei AM's businesses, contracts and operations.

Private Corruption: refers to any act that a person performs directly or through an intermediary, aimed at improperly obtaining an economic or any other type of benefit for Pei AM or for himself, from a private individual, in a matter that is known or that he should know about. There will be Private Corruption, when directly or through an intermediary, a person promises, offers, grants any gift, object of value or unjustified benefit or unduly influences a third party of a private nature to unduly favor Pei AM and/ or some other person.

Public Corruption: refers to the event in which a person gives or offers money, payments in kind or any type of gift, utility or object of value, directly or indirectly, to a Public Official, so that the latter, in the performance of his or her duties: (i) delays or omits an act inherent to his or her position; (ii) executes an act contrary to his or her official duties; (iii) performs an act that he or she must perform; by virtue of his or her duties and/or (iv) receives money or other utility from those persons who act on behalf and representing Pei AM and/or who have an interest in a matter brought to its attention.

Due Diligence: refers to the thorough execution of a set of procedures necessary to be able to adopt/make sufficiently informed decisions regarding possible risks involving ML/TF.

Complaints : statement or report made in the Ethics Mailbox of situations that any person may have in relation to Pei AM regarding real or apparent situations of non-compliance with the Code of Conduct, the Manual for the Prevention and Control of ML/TF Risk, the Anti-Corruption Policy or issues of non-compliance with the Pei AM Business Ethics Program.

Request for Land Acquisition: refers to the instruments by virtue of which Pei AM validates and requests information from both the properties and the Land Owners.

Director: refers to the legal representatives, Administrators, members of the Pei AM committees, and, in general, to those who administer and direct Pei AM.

State Entity(ies): refers, in accordance with current Colombian regulations, to: (i) the Nation, the departments, the provinces, the capital district and the special districts, the metropolitan areas, the public establishments, the industrial and commercial companies of the State, the mixed economy companies, as well as the indirect decentralized entities and other legal persons in which such participation exists; (ii) The Senate of the Republic, the House of Representatives, the Superior Council of the Judiciary, the Attorney General's Office of the Nation, the National Registry of Civil Status, the ministries, the administrative departments, the



superintendencies, special administrative units and; (iii) in general, the State agencies or dependencies to which the law grants the capacity to contract.

Scam: refers to any act carried out by a person with the aim of deceiving, inducing or keeping a third party in error by means of tricks or deception, the objective of which is to cause the third party to suffer a detriment in his or her assets and the person who commits them to obtain a benefit or gain for himself or for a third party.

Risk Event(s): incident or situation of ML/TF risk that occurs in a particular place during a given period of time.

Risk Factors: They are the agents that generate ML/TF risks. For the purposes of SAGRILAF, they correspond to: Counterparties, products, channels and jurisdictions or geographic areas. For the purposes of the ML/TF Risk Prevention and Control Manual and considering the activity of Pei AM, reference will be made to "Service" whenever the product factor is mentioned, in accordance with the ML/TF risk matrix included in the ML/TF Risk Prevention and Control Manual.

Financing of Terrorism: set of activities aimed at channeling legal or illegal resources directly or indirectly to provide, collect, deliver, receive, manage, contribute, guard or store funds, goods or resources, or carry out any other act that promotes, organizes, supports, maintains, finances or economically sustains organized crime groups, armed groups outside the law or their members, or national or foreign terrorist groups, or national or foreign terrorists, or terrorist activities.

Close Relatives: refers to the family members of any person who might be expected to influence, or be influenced by, that person in his or her relations with Pei AM and includes: (i) that person's children and spouse or similar person; (ii) the children of that person's spouse or similar person; and (iii) dependents of that person or that person's spouse or similar person.

Civil servant: means any person holding a legislative, administrative or judicial office in a State, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of whether the individual was appointed or elected, including but not limited to: (i) any official or employee of a government or of any State entity, department, agency or entity of a government; (ii) any person in an official capacity or acting on behalf of a government, department, municipality, agency or entity of a government and/or State Entity; (iii) any officer or employee of a corporation wholly or partly owned by the State;

(iv) any employee of a public international organization such as, but not limited to, the World Bank or the United Nations; (v) any official or employee of a political party acting in an official capacity on behalf of a political party; and (vi) any candidate for public office.

FATF: refers to the abbreviation for the organization: "Financial Action Task Force."

Collaborator Management: It is understood as an assessment between lack of knowledge, lead time and quality of management of the complaint.

Interest Group(s): They are investors, collaborators, clients/tenants, communities, partners, partners of projects subject to the policy, landowners, suppliers, brokers, lobbyists, external advisors, competitors, state entities and/or public officials, according to

These Interest Groups are defined in the Anti-Corruption Policy and the others with whom Pei AM interacts.

Investors: refers to the shareholders, partners or investors of Pei AM, as well as their assignees or successors.

ML/TF: refers to money laundering and terrorist financing.

Money Laundering: set of activities aimed at concealing the illicit origin or giving the appearance of legality to resources obtained as a result of the execution of illicit or illegal activities.

Restricted Lists: refers to the databases containing a list of natural and legal persons who, according to the body that publishes it, may be involved in suspicious activities, investigations, proceedings or convictions related to Prohibited Conduct and ML/TF and that Pei AM has made available to its Collaborators to carry out Due Diligence Processes. These lists correspond to the Control lists issued by: (i) the Department of the Treasury of the United States of America (*List of Specially Designated Nationals and Blocked Persons*); (ii) the United Nations Security Council; (iii) the International Criminal Police Organization (INTERPOL); (iv) the National Police of Colombia; and/or (v) those suggested by the Superintendency of Companies of Colombia in its Basic Legal Circular from time to time.

Lobbyists: refers to a third party that is an expert and qualified in providing communication advisory services, public affairs management and crisis management, among others, for the protection and maintenance of the image and reputation of Pei AM before the different Interest Groups, in all types of situations through strategic relationships and daily support in Pei AM's public relations.

Manual on Prevention and Control of ML/TF Risk: refers to the manual that aims to implement SAGRILAFT in Pei AM.

Risk Matrix: refers to the matrix of risks associated with Prohibited Conduct that Pei AM prepares and updates within the framework of SAGRILAFT.

Corporate Sustainability Model: refers to the program through which Pei AM establishes and defines Pei AM's voluntary social investment actions, the primary purpose of which is social welfare, sustainability and generating a good reputation for Pei AM.

Criticality Level: refers to variables such as: (i) the financial and reputational consequences that the event may cause, (ii) the Management of the Collaborator and (iii) the recurrence, which result in negative consequences for Pei AM due to inappropriate ethical conduct.

Anti-Corruption Regulations: refers to Law 1778 of 2016 (Transnational Bribery), the Colombian Anti-Corruption Statute (Law 1474 of 2011), the Colombian Penal Code, External Circular No. 100-000003 dated July 26, 2016 issued by the Superintendency of Companies, the Corporate Good Practices Policies and any other regulations concordant with or related to the prevention of corruption contained in Colombian law, as well as any other regulations that may modify, replace or regulate them from time to time.

OFAC: refers to the abbreviation in English whose translation corresponds to: "Office of Foreign Assets Control".



Compliance Officer: refers to the person appointed within Pei AM, who is responsible for verifying the proper and timely compliance with the procedures contained in the Manual for the Prevention and Control of the Risk of ML/FT and in the Anti-Corruption Policy; for ensuring and promoting the execution, implementation and monitoring of management and control; for monitoring the status of implementation and continuous improvement of SAGLAFT; and for submitting reports to the corresponding bodies.

Operation: refers to the action taken by any Counterparty to establish commercial, financial or contractual links with Pei AM. They may be classified as Attempted Operations, Unusual Operations and Suspicious Operations.

Unusual Operation: refers to a transaction that, due to its quantity, frequency or any other characteristic, is not related to the economic activity of the Client, Collaborator, partner, Supplier, Landowner or contractor of Pei AM.

Suspicious Operation: any unusual operation for which the Client, partner, Collaborator, Supplier, Landowner or contractor of Pei AM has not provided satisfactory justification and leads to the reasonable conclusion that it is being used to hide, conceal, secure, guard, invest, acquire, transform, transport or carry out any act aimed at giving the appearance of legality to goods and services derived from illicit activities, or to allocate resources to the Financing of Terrorism.

Operation Attempted: refers to a suspicious operation that is not completed due to the withdrawal of the person attempting to carry it out or because the Controls established by Pei AM do not allow it to be carried out.

Ethics Mailbox Operator: refers to the independent third party, that administers Pei AM's Ethics Mailbox.

Pei AM: stands for PEI Asset Management SAS

Publicly Exposed Persons (PEP's): PEPs are defined as individuals who perform prominent public functions or who, due to their position, manage or administer public resources. This definition also includes individuals who have performed prominent public functions or who, due to their position, have managed or administered public resources up to two years after leaving office or as indicated by current regulations on the matter. Senior executives of state entities, high-ranking officials in political parties and heads of state are also considered PEPs.

Anti-Corruption Policy: refers to the internal policy of Pei AM that establishes the guidelines and rules that the Subjects of the Policy must comply with in their relationship with the different Interest Groups, with the purpose of preventing Prohibited Conduct, and establishing specific responsibilities for its prevention, detection, investigation, response and, in general, for the management of the risks associated with Prohibited Conduct.

Corporate Good Practice Policies: refers to the agreements, manuals and policies that are signed from time to time by Pei AM to regulate decision-making mechanisms and, in general, the governance guidelines of Pei AM, among others, including but not limited to the shareholder agreements of Pei AM.

Procedure for Handling Complaints through the Ethics Mailbox: refers to the procedure through which Pei AM regulates the management of complaints through the Ethics Mailbox and the management of the same by the Ethics Committee.





Due Diligence Procedures: refers to the procedures for consulting Restrictive Lists and Background Checks, the terms and conditions of which are regulated in the Anti- Corruption Policy.

Linking Procedure: refers to the procedure by which a Supplier or Collaborator is contractually linked to Pei AM.

Land Owners: refers to those natural or legal persons with whom Pei AM enters into or negotiates agreements or contracts of promise of sale, exchange of sale, and any other legal scheme, in order to acquire for itself a real estate property for the subsequent development, marketing, leasing and/or operation of a real estate project.

Suppliers: refers to any third party contractor that provides or supplies Pei AM with the goods and/or services necessary for the development, marketing and/or operation of its projects and the development of its businesses in general.

Ethics Committee Regulations: refers to the regulations that define the rules that determine the operation of the Ethics Committee and the guidelines for the proper organization of said body.

Suspicious Operation Report (SOR): refers to the communication sent by the Pei AM Compliance Officer to the UIAF to inform it of the existence of Suspicious Operations related to ML/TF.

Internal Reports: refers to those reports that are handled within Pei AM and can be made by any Collaborator who is aware of an Attempted, Unusual or Suspicious Operation and which will be directed to the Pei AM Compliance Officer, through the ethics line.

Risks Associated with ML/TF: refers to those through which the risk of ML/TF materializes. They correspond to the following categories: Legal, Operational, Reputational and Residual.

Legal Risk: refers to the possibility of loss incurred by Pei AM when sanctioned or forced to compensate damages as a result of non-compliance with rules or regulations and contractual obligations. It also arises as a consequence of failures in contracts and transactions arising from malicious actions, negligence or involuntary acts that affect the execution of contracts or operations.

Operational Risk: refers to the possibility of incurring losses due to deficiencies or failures in human resources, processes, technology, infrastructure or the occurrence of external events. It includes the concepts of Legal Risk and Reputational Risk.

Reputational Risk: refers to the possibility of loss incurred by Pei AM due to disrepute, bad image, negative publicity, true or not, regarding Pei AM and its business practices, which cause loss of Clients, decreased income or legal proceedings.

Residual Risk: refers to the resulting level of risk after applying the corresponding mitigating controls to the related risks.

Warning Signs: They are defined as a set of qualitative and quantitative indicators that allow us to identify the possible existence of a fact or situation that escapes what Pei AM, in the ordinary course of its operations, has considered normal and that at the same time, contribute to the





construction of solid and relevant elements of judgment that serve as a starting point for the efficient investigation and judgment of ML/TF cases.

SAGRILAF: refers to the abbreviation for the Self-Control and Risk Management System for ML/FT, introduced by the Basic Legal Circular of the Superintendency of Companies.

Service: refers to the term related to the risk factor “product”.

SIPLA: refers to the abbreviation for “Comprehensive System for the Prevention of Money Laundering”. The term is introduced by External Circular 170 of the DIAN.

Transnational Bribery: refers, in accordance with the provisions of Colombian law, to that event in which a person, directly or indirectly, gives, offers or promises to a foreign Public Official, directly or indirectly, sums of money, any object of pecuniary value or other benefit or utility, in exchange for said official carrying out, omitting or delaying any act related to the exercise of his or her functions and in relation to an international business or transaction of said person.

Project Capitalist Partners: refers to the person with whom Pei AM decides to partner for the development and/or operation of a project, whose only obligation with respect to the project is to make capital contributions and has a passive participation in it.

Project Partners Subject to the Policy: refers to the person with whom Pei AM has decided to associate in a project and who has an active participation in the development, commercialization or operation of the same, holding the status of operator, developer, contractor, builder or broker of the same, among others, in addition to their status as partner. Project partners who have the above qualities must at all times apply the provisions contained in the Anti-Corruption Policy in the development of the activities they carry out with respect to the project in which they have associated with Pei AM.

Subject of Business Acquisitions: refers to those companies or vehicles in which Pei AM intends to acquire shares or participation quotas directly or indirectly, through a process of purchase, merger, spin-off, total sale of assets, purchase of a commercial establishment, modification of the corporate structure or any type of corporate reorganization process.

Background Check Subject: refers to Project Partner; Project Partner Subject to Policy; Land Owner; Lobbyist, Key Contributor and Supplier.

Due Diligence Subject: refers to the Subjects of Background Checks, the Subjects of Restrictive Lists and the Subjects of Business Acquisitions.

Subject(s) of the Policy and the Manual: refers to all those obliged to comply with the provisions of the Anti-Corruption Policy: Partners of Projects Subject to the Policy, Directors, Collaborators, external advisors, Lobbyists, Brokers, Suppliers, and in general those persons who act on behalf of and representing Pei AM.

Subject to Restricted Lists: refers to the Project Partner, Client/Tenant, Land Owner and the Subjects of the Policy and the Manual.

Response Time: refers to the maximum period of time that must elapse between the receipt of the Complaint through the Ethics Mailbox, until the closure and notification to the complainant of the conclusion and recommendations of the case.





Influence peddling: refers to the event in which a person unduly exerts influence over a Public Official in matters that the latter is aware of or may become aware of, in order to obtain any economic benefit for himself or herself or for third parties.

Cash Transaction: refers to those operations that Pei AM or its Collaborators carry out in the ordinary course of business in the development of their functions and that involve payments through delivery or receipt of cash (bills or coins) for an amount equal to or greater than one million Colombian pesos (COP1,000,000).

UIAF: refers to the Financial Information and Analysis Unit, a government entity in charge of receiving Reports of Suspicious Operations, Cash Transactions and Absence of Suspicious Operations (AROS).

Improper Use of Insider Information: refers to the improper use of information by a person who has learned it by reason of or in connection with his or her position or function and which is not publicly known, in order to obtain benefit for himself or herself or a third party.



1. PURPOSE

1.1. Regulate the operation of the Ethics Committee, in order to comply with due process in any situation that may arise.

1.2. Establish the guidelines, directives and procedures for handling Complaints submitted by Anonymous regarding non-compliance with the Code of Conduct and Ethical Dilemmas by the Ethics Committee.

2. MEMBERS

The Ethics Committee will be composed as follows:

- President.
- Compliance Officer, who will act as secretary of the Ethics Committee.
- Head of Human Resources.
- Legal director.

If matters involving any member of the Ethics Committee are involved, the complaint will be sent directly to the independent members of the Audit Committee, with a copy to the Internal Auditor.

3. RESPONSIBILITIES

The Ethics Committee will be responsible for the following activities:

- 3.1. Establish procedures to ensure the reception, custody and treatment of the Information received from shareholders, employees, clients and suppliers regarding irregularities related to the Code of Ethics, situations of improper use of assets and compliance with laws and regulations.
- 3.2. Establish procedures to ensure the confidentiality and anonymity of the Complaint and the Complainant and recommend actions to strengthen the ethics program.
- 3.3. Establish mechanisms that facilitate the reception and safekeeping of information received from shareholders, collaborators, clients and suppliers.
- 3.4. Communicate and inform shareholders, collaborators, clients and suppliers on an ongoing basis about the different mechanisms that Pei AM has established to report illegal situations or irregularities in ethical behavior.
- 3.5. Conduct the necessary investigations into irregularities and complaints received, which will be assigned as follows to ensure appropriate treatment:

Classification	Typification	Responsible for the analysis
Compliance	Conflict of Interest Policy Violation	<ul style="list-style-type: none"> • Official of Compliance • Legal director.
Finance, Accounting and Auditing	Accounting and auditing matters. False reports or accounting records.	<ul style="list-style-type: none"> • President



- 3.6. Ensure that the actions and recommendations adopted for each case are executed and that their results are reported to the Audit Committee and the Board of Directors.
- 3.7. Report to the Audit Committee and the Board of Directors or the body that takes their place, on the reception, treatment and actions taken by the Ethics Committee on all information received from shareholders, collaborators, clients and suppliers on irregularities presented.
- 3.8. Review the Complaints reports to be submitted to the Audit Committee on ethics and compliance matters received and processed during the respective period.
- 3.9. Review the reports that will be presented to the legal representatives of the matters related to the types of ML/TF, processed during the respective period.

4. PERIODICITY OF THE MEETING

The Ethics Committee will meet on an ordinary and annual basis and on an extraordinary basis when circumstances so require, for which the meetings (ordinary or extraordinary) must be called by the Compliance Officer.

5. DUE PROCESS

The Ethics Committee must meet within a period of no more than ten (10) business days, counted from the filing of a Complaint. Within the established period, the Compliance Officer will convene its installation and will initiate the administrative procedure.

Within a period of no more than ten (10) business days from the corresponding initial meeting, the Ethics Committee shall adopt an act of opening the file, if applicable, identifying the facts that motivate it, the imputation of the facts attributed to the alleged offender and the indication of the affected regulations. In cases qualified at the discretion of the Ethics Committee, the period established in this paragraph may be extended up to twenty (20) business days.

Any Collaborator, Client or potential client may bring to the attention of any member of the Ethics Committee any conduct or violation, duly justified or documented, that merits being brought to the attention of the Ethics Committee. The identity of the person who brings the facts to the attention of the Committee will be kept confidential, if requested by said person.

No Pei AM authority, regardless of rank, may take any action or measure against the person who has filed the Complaint, nor may they promote, against third parties, acts or measures that may be interpreted as retaliation for filing the Complaint.

