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1. INTRODUCTION

For the purposes of this writing, ethics means doing what is right, in the right way, for the right reasons; It covers behaviors, both personal and professional, in the development of businesses and activities related to Colinagro.

To act ethically is to do more than what is legal; It means doing what is and represents being correct, fair, respectful and responsible with respect to our shareholders, colleagues, employees, suppliers, customers and with society in general.

This document does not seek to compile all possible situations, it only establishes guidelines of conduct to guide daily actions and acceptable and appropriate standards of behavior that must be supported by the Constitution, laws and established internal regulations.

Below, some concepts and behavioral guidelines are clarified, as a framework of reference to help identify the limits within which we must act transparently.

2. OBJECTIVE

Adopt policies, guidelines, standards of conduct and controls that prevent acts of Corruption, Bribery and Transnational Bribery that may impact Colinagro's national and international operations.

Comply with current regulations regarding corruption and transnational bribery risk management.

Establish an organizational culture of integrity, committed at all levels to the fight against the commission of corruption and transnational bribery crimes in the company.

3. REGULATORY FRAMEWORK

Comply with Chapter -000011 of 2021, as well as those that modify, add or complement them. Law 2195 of 2022 "Through which measures are adopted regarding transparency, prevention and fight against corruption and other provisions are issued."

4. SCOPE

The transparency and business ethics program of Colinagro S.A. applies to all employees of the Company, to its interest groups: clients, suppliers, contractors, business allies, shareholders and, in general, to all those with whom any commercial, contractual or cooperative relationship is established.

The management of Colinagro declares the commitment of the Company and its directors to act in an ethical and transparent manner and to carry out their business responsibly, acting with criteria of zero tolerance for acts that contradict corporate principles and values.

Ethics and transparency concern the behavior of all members of the Company, from officials to the Board of Directors of Colinagro, without exception.

Colinagro also expects its business partners, distributors, suppliers and end customers and other interested parties to make decisive contributions to strengthening its culture of ethics and transparency.

The transparency and business ethics program is articulated with the policies and procedures defined by Colinagro in strengthening the commitment to ethics, the risk management system for money laundering, financing of terrorism and financing the proliferation of weapons of mass destruction, and other policies established by the Company.

This Program covers all countries that are related to the industrial, commercial and service operations carried out by Colinagro.

5. DEFINITIONS

• **Directors:** These are the natural or legal persons, designated in accordance with the corporate statutes or any other internal provision of the company and Colombian law, as the case may be, to manage and direct the Legal Entity.

• **Customer:** A third party that purchases our products to market them or users of our products.

• **Contractor:** refers, in the context of a business or international transaction, to any third party that provides services to a company or that has a contractual legal relationship of any nature with it. Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants and persons who are parties to collaboration or joint venture contracts with the company.

• **Spouse or permanent partner:** Person in a marital, religious or civil union, as well as in a de facto marriage (as determined by the country's legislation).

• **Due diligence**: Periodic review of legal, accounting and financial aspects related to a national or international business or transaction, to identify and evaluate the risks of bribery (national or transnational) that may affect the Company and contractors. A verification of the good credit and reputation of the contractors must be made

• **Employee:** Person linked to the Company under an employment contract or provision of services.

• **Company:** Any person, entity or related activity that is part of Colinagro.

• **OECD:** Organization for Economic Cooperation and Development, based in Paris, promotes policies to improve the economic and social well-being of the world's inhabitants.

• **Transparency and business ethics compliance officer:** natural person designated by the Company's board of directors to lead and manage the risk management system for bribery (national or transnational) and other acts of corruption.

• **Facilitation payments:** Payments made to government officials in order to ensure, promote or accelerate legal and routine procedures for the benefit of a company or its employees.

• **Supplier:** Company or individual that provides or renders goods or services to the Company, which may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants.

• **Interested Parties:** is a person or organization that may affect, be affected or be perceived to be affected by a decision or activity that is relevant to the Company.

• **Relative:** Person related up to the fourth degree of consanguinity, second degree of affinity or first civil relationship.

• **Relationship by consanguinity**

- **First grade:** Parents and children
- **Second degree:** Siblings, grandparents and grandchildren
- **Third degree:** Uncles, aunts, nephews and nieces
- **Fourth grade:** First cousins

• **Kinship by affinity**

- **First degree:** Parents-in-law, sons/daughters-in-law, stepfathers and stepchildren
- **Second degree:** Brothers-in-law and sisters-in-law

• **Civil relationship**

- **First civil degree:** Adoptive parents and adopted children

• **Politically Exposed Persons (PEP):** Public servants of any nomenclature and job classification system of the national and territorial public administration will be considered Politically Exposed Persons (PEP), when they have been assigned or delegated functions of: issuance of rules or regulations , general management, formulation of institutional policies and adoption of plans, programs and projects, direct management of assets, money or securities of the State, administration of justice or administrative sanctioning powers, and

individuals who are in charge of the direction or management of resources in political movements or parties.

The status of Politically Exposed Persons (PEP) is only in the time during the exercise of the position and for two (2) more years from leaving, resignation, dismissal or declaration of non-subsistence of the appointment, or of any another form of disengagement, or termination of the contract.

• **C/ST Risks:** is the Risk of Corruption and/or the Risk of Transnational Bribery.

• **Corruption Risks:** is the possibility that, by action or omission, the divert the purposes of public administration or affect assets public towards a private benefit.

• **Public Servant:** 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 public servant is also considered 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 body, or a State company or an entity whose decision-making power is is subject to the will of the State, its political subdivisions or local authorities, or a foreign jurisdiction. It will also be understood that any official or agent of an international public organization holds the aforementioned quality.

• **Transnational bribery:** The act by virtue of which a legal entity, through its employees, administrators, associates or contractors, gives, offers or promises to a foreign public servant, directly or indirectly: sums of foreign public servant, directly or indirectly: sums of money, objects of pecuniary value or any benefit or utility in exchange for that public servant carrying out, omitting or delaying any act related to their functions and in relation to an international business or transaction .

• **Partners:** They are those natural or legal persons who have made a contribution in money, work or other assets valued in money to a company in exchange for quotas, interest shares, shares or any other form of participation contemplated by Colombian laws. .

6. ELEMENTS OF THE PTEE

6.1 Design and approval

This program contemplates, among others, the control and management of risks related to Corruption, Bribery and Transnational Bribery, with the purpose of mitigating legal, reputational, operational, financial and other risks.

The application of this transparency and business ethics program of Colinagro is based on the commitment to ethics and aims to implement compliance policies and the identification, detection, prevention, management and mitigation of the risks of transnational bribery, as

well as as well as others that are related to any act of corruption that may affect the Company.

6.2. Compliance audit

The Board of Directors appointed the Compliance Officer, in response to the minimum requirements to perform the position contemplated in the Regulatory Framework. Each time this is designated, the company must inform the Superintendency of Companies within the following 15 business days in the manner required by the entity or the applicable Colombian regulations.

Colinagro must inform the Superintendency of Companies in writing, addressed to the Delegation of Economic and Corporate Affairs, within fifteen (15) business days following the designation, the name, identification number, email and telephone number of the Officer. of Compliance or in accordance with the specific instructions determined by the Superintendency of Companies

To control and supervise compliance with the Transparency and Business Ethics Program, measures will be adopted such as:

Supervision by the Compliance Officer regarding the effectiveness of procedures aimed at preventing bribery, corruption and dishonest practices.

The performance of at least one Compliance Audit per year by a designated internal auditor or by the compliance officer.

Monitoring of due diligence procedures as provided by the Compliance Officer.

Assign employees who are exposed to the risks of Transnational Bribery specific duties related to the prevention of this conduct.

6.3. Dissemination and Training

6.3.1. Divulgation

At least once a year, communication channels must be used to clearly and simply disseminate the transparency and business ethics program to employees, suppliers, customers and other business partners or interested parties, in such a way that the policies are clear. of compliance.

It will be carried out through socialization, publication on the company's intranet and website, guaranteeing access and knowledge to all interest groups.

Prepare and share information from our PTEE to interested parties through printed and digital media, electronic billboards and/or emails, website, related to issues and obligations

of administrators regarding the prevention of national and transnational bribery activities and acts of corruption, compliance policy, every time the PTEE undergoes any change, modification or update.

Likewise, the effective channels to receive confidential reports on dishonest practice activities and the consequences of violating the Transparency and Business Ethics Program.

6.3.2. Training

At least once a year, the compliance officer will be in charge of training his employees in C/ST risk prevention, specifically in how to prevent, detect, analyze, and report Acts of Corruption. These trainings will be carried out through training sessions which may be in person, virtual and/or with other tools that are available.

Training will be offered for:

• Raise awareness regarding the threats that bribery and corruption represent for Colinagro.

• Be subject to updating when circumstances so require, in response to the changing dynamics of the specific risks that employees face.

• All employees must know the PTEE during their joining process; Additionally, training will be carried out at least once a year and/or when any change is generated in the PTEE, either in person or virtually, for officials who, according to their position, may have greater exposure to the risk of corruption or bribery

• Inform third parties who have a higher degree of exposure to the risk of Transnational Bribery, for example in international operations such as: Imports, exports, transfers, purchases, etc., of the express commitments for their prevention.

At least the following:

The express statement of the third party in the sense that it has been informed by Colinagro regarding its obligation to comply with the regulations related to the prevention of National and Transnational Bribery, and that it is aware of Colinagro's PTEE, as well as the consequences of violating it.

6.4. Communication channel

Ethics line: Email: **eticacolinagro@colinagro.com.co**

It is a communication instrument provided by Colinagro so that employees, suppliers, clients and third parties in general can report situations or activities that are considered contrary to the law or the interests of the Company. It is a mechanism that guarantees independence, confidentiality and anonymity of the person reporting.

Situations that can be reported through the ethics line:

- Activities, businesses or operations contrary to the law.
- Activities suspected of money laundering, drug trafficking, financing of terrorism, fraud, bribery, financing of the proliferation of weapons of mass destruction or any other illicit act, businesses or operations contrary to the law
- Improper use of confidential information.
- Appropriation, damage or improper use of Company property.
- Improper management of contracts, operations or projects of the Company.
- Use of commercial practices that affect the interests of the Company.
- Matters of a commercial, labor, economic, legal or technical nature that involve conflicts of interest.
- Practices considered abusive, improper or corrupt.
- Accept gifts, favors or payments that may influence business and operational decisions, for the direct or indirect benefit of third parties.
- Possible violation of human rights.

Additionally, the Superintendence of Companies established the following channel so that any person can confidentially raise their complaints regarding cases of Transnational Bribery:

a. Transnational Bribery Reporting Channel:

   https://www.supersociedades.gov.co/delegatura aec/Paginas/Canal-de-Denuncias-Soborno-Internacional.aspx

b. Corruption Reporting Channel:

   http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portal-anticorrupcion

7. FUNCTIONS

Colinagro does not tolerate any form of corruption. We do not do it, nor do we allow it.

Colinagro does not promote, tolerate, or justify bribery. Bribery is understood as the offering of gifts, loans, fees, tips or some other benefit to any person, as an incentive to act contrary to his legitimate and correct interests. We do not make facilitation payments.

At least the following functions and activities are established that must be carried out by the control, management and administration bodies, without prejudice to the functions assigned by other provisions:

7.1 Board of Directors

- Define and issue the policies that may become necessary to strengthen the prevention and control of the risk of Corruption, Bribery and Transnational Bribery, which will be part of this PTEE.
- Define the profile and designate the Compliance Officer, who must comply at least with the requirements demanded by the Regulatory Framework.
- Designate the Compliance Officer.
- Approve the document that contemplates the PTEE and its modifications.
- Assume a commitment aimed at preventing C/ST Risks, so that the Obligated Entity can carry out its business in an ethical, transparent and honest mann Ensure the supply of the economic, human and technological resources required by the Compliance Officer to carry out his work.
- Order the pertinent actions against the Associates, who have management and administration functions in Colinagro, the Employees, and administrators, when any of the above violates the provisions of the PTEE.
- Lead an appropriate communication and pedagogy strategy to guarantee effective dissemination and knowledge of the Compliance Policies and the PTEE to Employees, Associates, Contractors (in accordance with the Risk Factors and Risk Matrix) and other identified interested parties.

7.2 Legal Representative

- Present with the Compliance Officer, for approval of the board of directors or the highest corporate body, the PTEE proposal.
- Ensure that the PTEE is articulated with the Compliance Policies adopted by the board of directors or the highest corporate body.
- Provide effective, efficient and timely support to the Compliance Officer in the design, direction, supervision and monitoring of the PTEE.

- In cases where there is no board of directors, the legal representative will propose the person who will occupy the role of Compliance Officer, for appointment by the highest corporate body.
- Certify before the Superintendency of Companies compliance with the provisions of this Chapter, when required by this Superintendency.
- Ensure that the activities resulting from the development of the PTEE are duly documented, so that the information meets criteria of integrity, reliability, availability, compliance, effectiveness, efficiency and confidentiality. The documentary supports must be kept in accordance with the provisions of article 28 of Law 962 of 2005, or the rule that modifies or replaces it.

7.3 Compliance Officer

7.3.1 Minimum requirements to be appointed as a Compliance Officer

The Compliance Officer must meet at least the following requirements:

- Have the ability to make decisions to manage C/ST Risk and have direct communication with, and report directly to, the board of directors. Have sufficient knowledge of C/ST Risk management and understand the ordinary course of activities of the Obligated Entity.
- Have the support of a human and technical work team, in accordance with the c/st risk and the size of the obligated entity. not belong to the administration, to the bodies or belong to the tax audit body (act as a tax auditor or be linked to the tax audit company that performs this function, if applicable) or whoever performs similar functions or acts in his/her place in the obligated entity.
- When the compliance officer is not linked to the company, this natural person may or may not be linked to a legal entity.
- Not serve as a compliance officer, principal or alternate, in more than ten (10) companies. to serve as a compliance officer for more than one obligated company, (i) the compliance officer must certify; and (ii) the body that designates the compliance officer must verify that the compliance officer does not act as such in companies that are competitors.
- Be domiciled in Colombia.
- Not have a disciplinary, fiscal, administrative or criminal record for crimes related to national or transnational corruption or bribery, whether in the public or private sector respectively.
- Other requirements established in the Regulatory Framework and those defined by the Board of Directors.

7.3.2 Duties of the Compliance Officer

- Present with the legal representative, for approval of the board of directors, the PTEE proposal, as well as any modification and adjustment to it.
- Present, at least once a year, reports to the board of directors. At a minimum, the reports must contain an evaluation and analysis of the efficiency and effectiveness of the PTEE and, if applicable, propose the respective improvements. Likewise, demonstrate the results of the management of the compliance officer and the administration of Colinagro, in general, in compliance with the PTEE.
- Ensure that the PTEE is articulated with the Compliance Policies adopted by the board of directors or the highest corporate body.
- Ensure effective, efficient and timely compliance with the PTEE.
- Implement a Risk Matrix and update it according to the Obligated Entity's own needs, its Risk Factors, the materiality of the C/ST Risk and in accordance with the Compliance Policy.
- Define, adopt and monitor actions and tools for the detection of C/ST Risk, in accordance with the Compliance Policy to prevent C/ST Risk and the Risk Matrix.
- Ensure the implementation of appropriate channels to allow anyone to confidentially and securely report non-compliance with the PTEE and possible suspicious activities related to Corruption.
- Verify the proper application of the whistleblower protection policy that Colinagro has established and, with respect to employees, the workplace harassment prevention policy in accordance with the law.
- Establish internal investigation procedures in Colinagro to detect non-compliance with the PTEE and acts of Corruption
- Coordinate the development of internal training programs.
- Verify compliance with the Due Diligence procedures applicable to Colinagro.
- Ensure the proper filing of documentary supports and other information related to the management and prevention of C/ST Risk
- Design the methodologies for classification, identification, measurement and control of C/ST Risk that will be part of the PTEE.
- Carry out the evaluation of compliance with the PTEE and the C/ST Risk to which the Obligated Entity is exposed.

7.4 Employees, Administrators and Associates

All Colinagro employees, administrators and associates are required to comply with this policy and must:

- Act in a timely and diligent manner, especially when holding a management position, and the existence of facts or omissions that may imply a violation of the values, principles and PTEE are known. They must report any act of Transnational or national Bribery and any corrupt actions of which they are aware.
- Refrain from approving, encouraging, participating in or tolerating violations of the Company's ethical commitment.
- Refrain from retaliating directly or indirectly, or from motivating others to do so, against any employee for reporting conduct that may violate the code of ethics.
- Assume a commitment aimed at preventing Bribery, as well as any other corrupt practice, so that Colinagro can carry out its business in an ethical, transparent and honest manner.
- Mandatory attendance at all training sessions held.
- Managers will be responsible for promoting a culture of transparency and integrity in which bribery and corruption in general are considered unacceptable.

7.5 Suppliers, Contractors, Clients and Third Parties

Colinagro will make the PTEE known to its suppliers, contractors, clients and other third parties, who must comply with the provisions herein as applicable.

7.6 Tax audit

- The statutory auditor must report to the competent authorities any act of Corruption that he or she becomes aware of in the course of his or her duties. In fact, article 32 of Law 1778 of 2016, which adds paragraph 5 of article 26 of Law 43 of 1990, imposes on tax auditors the express obligation to report to the criminal, disciplinary and administrative authorities, for the alleged commission of crimes, which he detects in the exercise of his position, even, despite professional secrecy, in the following terms:

“Tax auditors will have the obligation to report acts of corruption to the criminal, disciplinary and administrative authorities, as well as the alleged commission of a crime against the public administration, a crime against the economic and social order, or a crime against the economic assets that have been detected in the exercise of their position. You must also bring these facts to the attention of the corporate bodies and the administration of the company. The corresponding complaints must be presented within six (6) months following the moment in which the fiscal auditor became aware of the facts. For the purposes of this article, the regime of professional secrecy that protects tax auditors will not be applicable.”

- In compliance with his duty, the tax auditor must pay special attention to alerts that may give rise to suspicion of an act related to a possible act of Corruption

- Verify the effectiveness of this PTEE through the coherence of the accounting records
- Other functions that are incumbent upon him by law.

8. STAGES OF PTEE

8.1 Identification of C/S/ST risks

Within Colinagro's risk matrix, risks related to dishonest practices, bribery and corruption are identified and evaluated and the most appropriate control mechanisms and their application to the identified Risk Factors are defined.

8.2 Identification of C/ST Risk Factors

Among others, Colinagro will take into account the following risk factors that, according to international practice, have a greater possibility of occurring:

- Country: Refers to nations with high rates of perception of corruption, which are characterized, among other circumstances, by the absence of an independent and efficient administration of justice, a high number of public officials questioned for corrupt practices, the lack of standards effective to combat corruption and the lack of transparent policies regarding public procurement and international investments.

- Economic Sector: The OECD prepares reports with different frequency and scope, which shows percentage figures of the impact of this scourge; there are economic sectors with a greater risk of corruption. In effect, bribes are being measured or linked to different economic sectors.

  Additionally, the degree of risk increases in countries with high rates of perception of corruption and, under certain circumstances, when there is frequent interaction between the legal entity, its employees, directors or its suppliers with public servants.

  In the same sense, when local regulations require a large number of permits, licenses and other regulatory requirements for the development of any economic activity, it also facilitates the performance of corrupt practices for the purposes of expediting a particular procedure.

- Third parties: The risk increases in countries that require intermediaries, to carry out an international business or transaction, in accordance with local customs and regulations, consequently, authorities of other nations consider the participation of a Legal Entity to be high risk. in collaboration or shared risk contracts with Contractors

or that the latter are closely related to senior government officials of a particular country, in the context of an international transaction.

- Others: There may be additional Risk Factors to those described.

8.3 Measurement or evaluation of C/S/ST Risks

On a periodic, informed and documented basis, Colinagro will measure or evaluate its C/S/ST Risks. The measurement or evaluation of the risk of Corruption, Bribery or Transnational Bribery will be carried out in accordance with what is established in the C/S/ST Risk Management Methodology.

When entering a new market or offering new products or services, it will identify the C/S/ST risks that these situations may generate and will proceed to evaluate them in accordance with the aforementioned methodology.

8.4 Control and monitoring of the PTEE

The purpose of the control and monitoring stage is to define the measures that must be implemented to prevent and mitigate the risk inherent in the situations to which the company is exposed. The control and monitoring that is applied to the company's internal processes will seek to reduce the possibility of occurrence or the impact of the risk situation if it materializes.

Among the control and monitoring activities that can be carried out are:

- Supervision by the compliance officer regarding C/ST risk management in legal relationships with state entities or in international or national businesses or transactions in which the company participates.
- The periodic performance of compliance audits and due diligence procedures, as provided by the compliance officer.
- Conducting surveys of employees and Contractors, in order to verify the effectiveness of the PTEE.

9. DUE DILIGENCE

Due diligence procedures are oriented towards knowing the counterparties and identifying and evaluating whether the findings regarding the counterparties may materialize any risk of Corruption, Bribery and Transnational Bribery. The due diligence procedures that apply to the PTEE are those described in the Colinagro SAGRILAFT Manual.

9.1 Warning signs

Below are some warning signs to look out for, among others:

a. to. In the analysis of accounting records, operations or financial statements:

- Invoices that appear to be false or do not reflect the reality of a transaction or are
- inflated and contain excessive discounts or refunds.
- Foreign operations whose contractual terms are highly sophisticated.
- Transfer of funds to countries considered tax havens.
- Operations that do not have a logical, economic or practical explanation.
- Operations that go beyond the ordinary course of business.
- Operations in which the identity of the parties or the origin of the funds is not It's clear.

- Assets or rights, included in the financial statements, that do not have a real value or that they do not exist.

b. In the corporate structure or corporate purpose:

- Complex or international legal structures without apparent commercial, legal or fiscal benefits or owning and controlling a legal entity without a commercial objective, particularly if it is located abroad.
- Legal entities with structures where there are national trusts or foreign trusts, or non-profit foundations.
- Legal entities with “off shore entities” or “off shore bank accounts” structures.
- Non-operational companies under the terms of Law 1955 of 2019 or that due to the development of business can be considered “paper” entities, that is, they do not reasonably fulfill any commercial purpose.
- Companies declared as fictitious suppliers by the DIAN.
- Legal entities where the Final Beneficiary is not identified.

c. In the analysis of transactions or contracts:

- Frequently resort to consulting, intermediation contracts and the use of joint ventures.
- Contracts with contractors or state entities that give the appearance of legality that do not reflect precise contractual duties and obligations.
- Contracts with contractors that provide services to a single client.

- Unusual losses or gains in contracts with contractors or state entities or significant changes without commercial justification.
- Contracts that contain variable remuneration that is not reasonable or that contain payments in cash, virtual assets or in kind.
- Payments to PEPs or people close to the PEPs.
- Payments to related parties (associates, employees, subordinate companies, branches, among others) without apparent justification.

10. COMPLIANCE POLITICS OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

Guidelines

Act with absolute integrity and transparency in the activities you carry out on behalf of the Organization.

Establish serious, upright and professional relationships with representatives of official entities, seeking to create unsuspecting and disinterested links.

Carry out administrative procedures before government entities, rigorously complying with the requirements established by law.

Do not offer or receive money, gifts, benefits, discounts, employment opportunities and any consideration that could be construed as a bribe.

Remember that even in the event that COLINAGRO is a beneficiary or is interested in a procedure or decision in respect of which it has a legitimate right or interest, making this type of payment or receiving it is unacceptable conduct.

Good practices, procedures and reporting are applied, through the ethical line, among others, to ensure the prevention, identification and treatment of acts and behaviors that are considered illegal.

Actions that involve bribery in national or transnational operations or acts of corruption are prohibited, and its stakeholders are required to comply with all anti-corruption and anti-bribery regulations.

Employees involved in processes of acquisition of goods and services and negotiations at a national or international level must apply due diligence principles to adequately understand third parties, and in particular, the relationship with government entities or public servants before formalizing operations.

In these operations, the procedures described in the risk management system for money laundering, financing of terrorism and financing the proliferation of weapons of mass

destruction, in the contracting manual and in the documentation of the management system must be applied. quality.

10.1 Policies on delivery, offer or acceptance of gifts or benefits to third parties

It is prohibited to give or receive gifts, entertainment or hospitality that may inappropriately influence a decision or a business relationship.

Except in the following topics, (example):

- Institutional elements that promote the brand

- Hospitality in casinos and restaurants that do not exceed 10% of a SMMLV

- Discounts on products up to authorized limits

- Trips, training courses or awards for meeting goals

Employees may not use their position in the company to request any type of personal favor, payment, discount, travel, accommodation, gifts, loans or any type of handout from suppliers, clients or interest groups. Requests of this type may result in the benefactor being forced to provide the favor or gift to avoid losing business with the company or the recipient accepting poor or substandard service. These practices are prohibited.

Employees should not act on behalf of other entities, whether these be companies, non-profit associations or individuals, or solicit gifts, cash or time from suppliers, customers or stakeholders.

Any Gift or invitation that has the potential to exert inappropriate influence on a business decision or relationship must be reported by email to the area manager and compliance officer.

When, due to certain circumstances, a gift of representative value is accepted (presumably worth more than $100,000), it may be accepted only in the name of the company and must be made available to the customer service process, who will immediately proceed. to raffle it off among all the company's employees.

10.2 Remuneration policy and payment of commissions to employees, associates and contractors

<u>To Employees:</u>

Colinagro has different manuals and internal policies that define the guidelines for the payment of commissions to commercial area officials, which contribute to the prevention of C/S/ST Risks; For example: authorization levels to approve expenses, advance payment

requests, purchasing manual, guidelines for the payment of commissions & BSC to officials in accordance with the Colombian labor legal framework, etc. Commissions to commercial area officials are made based on the conditions stipulated in the employment contracts.

To Contractors:

No commissions or any type of remuneration other than payment for services are paid.

To Associates:

There are no stipulated commissions or any type of remuneration for the other partners of the company.

Colinagro, among others, must take into account the following considerations:

• All financial transactions must be identified in detail and recorded appropriately and clearly in the books of accounts;

• The accounting books must be available for inspection by the Legal Representative, the Board of Directors, the General Assembly of Shareholders, the internal auditors, the Statutory Auditor, as applicable.

• All legal provisions and all national tax regulations must be complied with.

10.3 Expense policy related to entertainment activities food, lodging and travel

- It is prohibited to give, offer or promise entertainment-related entertainment to a public official or a third party, as well as receive it.
- Colinagro will cover expenses related to food, lodging and travel of its employees in accordance with internal policies on travel expenses.
- In any case, payment for food, lodging and travel cannot be used to obtain an improper commercial advantage or to corruptly and illegitimately influence the way a person acts or makes decisions. On the contrary, these expenses must always be linked to a legitimate business purpose and comply with the provisions of internal expense manuals and policies.

10.4 Political contributions of any nature

- Colinagro does not participate in any way in political activities, nor does it support any political party or movement in candidacies for public corporations or elected positions.
- The company recognizes the right of its employees to participate in political affairs in their personal capacity. However, company employees are prohibited from

participating in political activities within the company or making contributions to political candidates, parties and people linked to them on behalf of the entity.

10.5 Donation Politics

- Colinagro will actively contribute to any social and economic problem related to its environment through donations, which will previously be analyzed and reviewed by the General Management and approved by the Shareholders and Board of Directors if applicable.
- Donations made by the company must be transparent, be clearly reflected in the accounting books and comply with the respective regulations.
- Donations will only be made to non-profit entities and after having been subject to Due Diligence, knowing who is the recipient of the donation and the final beneficiary of it.

10.6 Anti-corruption Clauses in Contracts

All contracts or agreements signed by Colinagro must contain clauses, declarations or guarantees on anti-bribery and anti-corruption conduct. In addition to declaring and ensuring compliance with applicable anti-corruption laws and regulations, the right to terminate the contract should be included when a violation of the PTEE or any anti-corruption law or regulation occurs.

In any case, the person responsible for the negotiation must ensure that the clauses are included before signing the contracts or agreements; if they are not observed, they must request them from the area in charge.

Therefore, in all contracts, Colinagro will inform of the existence of this Program.

11. UPDATE OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

This PTEE will be subject to updates and modifications whenever there are changes in the company's activity that alter or may alter the degree of C/S/ST Risk, when there are changes in the applicable regulation that warrant it, or at least every two (2) years. In the event of substantive modifications, they must be submitted again for approval by the Board of Directors.

12. TRANSPARENCY

Within the organization, all mechanisms that promote transparency in management must be used.

Especially in the negotiation with suppliers and in making purchase or contract award decisions.

The Purchasing function carried out by the different employees, in the different roles that have the scope to make decisions in this regard, must be able to be justified and managed in a transparent manner, through control mechanisms, such as generation of purchase orders, which require approval from a higher level, request for multiple quotes, etc.

As well as in all actions with interest groups.

13. CONFLICT OF INTEREST

For the purposes of the Company's transparency and ethics assurance program, bribery, fraud and corruption are considered dishonest practices that unfairly benefit people who abuse their power or position and cause harm to the Company and its employees. interest groups.

A conflict of interest exists when an employee has a personal interest that interferes with the objectivity required by his or her position, affects his or her decision making, or may give the appearance of having one.

Said conflict of interest may arise directly from the employee himself, or indirectly through his or her spouse, permanent partner, relative or person with whom he or she has a romantic relationship.

A conflict of interest may also be potential. This occurs when current circumstances do not give rise to a personal interest interfering with the duties of the position, but it is possible that it will occur in the future.

It is mandatory for all employees to analyze direct or indirect situations of conflicts of interest, current or potential, that may interfere with their decisions and actions in the company and present a written report to their immediate boss in a timely, complete and truthful manner to allow the company evaluates them and determines whether it is necessary to take measures to prevent or minimize any impact on the company and its corporate reputation.

Every employee has the responsibility to declare a conflict of interest in writing to their area manager and the compliance officer, a procedure that cannot be delegated or ignored.

The company (corresponding management, compliance officer and general management) will determine in each case the degree of impact caused by a declared conflict of interest. Each determination will depend on the specific circumstances (facts, position of the employee and functions of the relative, degree of relationship, etc.).

The golden rule for dealing with a conflict or potential conflict is to openly disclose all the facts. This allows everything to be examined correctly and objective decisions to be made in each case.

14. PRIVILEGED INFORMATION

An employee may find himself in a conflict of interest situation if he uses and/or exploits confidential information or business opportunity of Colinagro, obtained through his work, to obtain benefit or an advantage for himself or another.

15. CONFIDENTIAL INFORMATION

Information is a valuable resource. Unauthorized disclosure of internal information may imply a loss of value and be detrimental to Colinagro.

We have to ensure that internal information is protected, so we must:

- Limit the disclosure of internal information to people with a legitimate “need to know” that serves the interests of Colinagro.
- Know the rules regarding information management.
- Ensure that all confidential records of officials, users, clients and suppliers are securely stored, both in paper and electronic format.

16. PRIVACY AND DATA PROTECTION

Colinagro is committed to respecting the confidentiality of the personal information of its employees, clients, suppliers, users in general, administrators and partners. The Company only obtains and retains such data because it is necessary for the effective operation of the Company or compliance with the law.

The processing of data and information will occur within the applicable regulatory framework and in accordance with the personal information processing policies.

Officials should not use documents that lack authenticity. Anyone who modifies, alters, simulates or falsifies a document or part of it and/or signs on behalf of another person will be considered document forgery. It applies to physical or digital documents with private, official, public nature, among others.

Below are some situations that can occur as documentary falsification:

- Alteration of a document in some of its essential elements.
- Simulation of a document in whole or in part, in a way that misleads about its authenticity.
- Assumption of intervention by people who have not participated in the preparation of the document.
- Lack of truth in the narration of the facts expressed in the document.
- Paper with a company logo is used to write false information, it is altered or signed in the name of another person.

- Replicate the rubric with the objective of obtaining a benefit, amending or omitting some responsibility, on behalf of another person.

17. COMPANY RESOURCES

The purpose of the company's resources is to help employees achieve the different goals of COLINAGRO. The improper use or waste of company resources, including workers' time, harms everyone and damages the operational and financial performance of the Company, for which abuse or inappropriate use will have the corresponding disciplinary implications according to the case.

18. FAIR COMPETITION

Colinagro respects all the companies in our environment, including our competitors. We treat them as we would like to be treated. Our status as leaders in the industry reaffirms our obligation to serve as an example in this area.

We are interested in working in an industry where business practices have good reputation. It makes our jobs easier and reaffirms the trust of our customers. Share any type of information, such as rates, costs or plans marketing with competitors can make it appear, whether true or No, we carry out price manipulation, territorial compartmentalization or other types of manipulations and distortions of the free market, which is why it is prohibited do it in any way.

19. USE OF COMMERCIAL AND FINANCIAL RECORDS AND THE FIGHT AGAINST MONEY LAUNDERING

Colinagro ensures that financial or other records are accurate. Accuracy is essential for a successful business. It is an essential part of running a business legally, honestly and efficiently. In particular, it is crucial to be able to provide clear, regular and reliable information to our Shareholders and other users of it.

Finally, Colinagro ensures that our activity does not serve to launder money from criminal activities, with rigorous control processes and knowledge of business partners, such as verification on restrictive lists, analysis of financial information, etc.

20. PRODUCT SAFETY AND QUALITY

All Colinagro workers who are part of the product development, manufacturing, promotion and sales processes must commit to achieving total product quality, from concept to distribution, and even after the product has been released to the market.

21. HEALTH, SAFETY AND PROTECTION

Colinagro as a company has arranged the different resources so that there is a healthy, safe and protected work environment. Safety at work depends on each of its employees, which is why it is the responsibility of each member to adhere to the policies and regulations on the subject. , assuming the damages and sanctions that may arise due to non-compliance.

22. HARASSMENT

Colinagro has implemented the prevention mechanism provided for by the Law, through documented processes and with a Coexistence Committee that guarantees respect and human dignity. At Colinagro, this principle is fundamental in our way of working. Any behavior or action that may infringe this right and, in particular, any form of sexual harassment is unacceptable.

Harassment covers sexual issues and discrimination based on any gender, religion, political party, etc.

23. SANCTIONS

Colinagro officials and partners must know and apply the provisions established in this transparency and business ethics program. Failure to comply with any matter provided in this program will be considered a serious offense and may lead to the application of disciplinary measures and even the cancellation of the contract for just cause, in the case of employees. In said event, the disciplinary procedure will be carried out in accordance with the provisions of Colinagro's internal work regulations.

In any case, the disciplinary decision and/or termination of the contract for just cause is made without prejudice to any civil or criminal liability that may arise.

24. FORMATS, FILE AND CONSERVATION

The filing and conservation procedure for documents that are related to national or international businesses or transactions must comply with the document management program and the retention tables established by the Company.

All information related to the PTEE and specifically, information related to international business or transactions must be kept for at least ten (10) years.