

Official Translation code: ALIAR-DOC002 of a document written in Spanish, sealed by the undersigned Official Translator, June 11th two thousand and twenty-four, Bogotá, D.C., Republic of Colombia.

AGROPECUARIA ALIAR S.A.

COMPLIANCE MANUAL OF THE BUSINESS TRANSPARENCY AND
ETHICS PROGRAM

CUM-MA-002

ISSUE: 02

ISSUE DATE: 03/22/2024

PREPARED BY: JEISSON MAURICIO GARCÍA, Compliance officer

REVIEWED BY: FELIX ALEXANDER RAMIREZ, Legal Manager

APPROVED BY: Higher Corporate body (AGA)

INDEX

1. OBJECTIVE
2. SCOPE AND CONSIDERATIONS


Silvin A. Puertas P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 2008 de la Procuraduría

3. REFERENCE DOCUMENTS

4. DEFINITIONS

5. CONTENT

5.1 POLICY

5.2 MODALITIES AND ACTIONS THAT GO AGAINST ETHICS AND
TRANSPARENCY

5.3 ELEMENTS OF THE BUSINESS TRANSPARENCY AND ETHICS
PROGRAM

5.4 TRANSNATIONAL CORRUPTION AND BRIBERY RISK MANAGEMENT

5.5 DUE DILIGENCE

5.6 WARNING SIGNS 23

5.7 REPORT OF COMPLAINT OF TRANSNATIONAL BRIBERY AND ACTS
OF CORRUPTION

6. RECORDS

7. ANNEXES

8. CONTROL OF CHANGES

1. OBJECTIVE

To establish the Transparency and Business Ethics policy and program defined by
Senior Management related to transparency and integrity in the Company, mainly



Silvia A. Puertas P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/96 Ministerio

focused on preventing, controlling and managing the risks of Fraud, Conflict of interest, bribery, Corruption and transnational bribery (C/ST).

2. SCOPE AND CONSIDERATIONS

The company Agropecuaria Aliar S.A., in compliance with current regulations on Transparency and Ethics, designs the Transparency and Business Ethics Program, which includes compliance policies, as well as procedures related to the treatment of acts of bribery and corruption, in the frame of Law 1778 of February 2, 2016.

The structure of this program is also framed in the guidelines of the international standard ISO 26000 in relation to fair operating practices (6.6), specifically those related to anti-corruption (6.6.3), working with a methodology based on risk management that allows: identifying, controlling and measuring them, through the establishment of policies, procedures and good practices.

The Transparency and Business Ethics Program seeks to declare the commitment of Shareholders, Managers and Collaborators to ethical and transparent actions, framed in solid corporate values under the slogan of zero tolerance for acts that violate principles, standards, laws and ethics.

This program specifically relates those behaviors and modalities that go against ethics and transparency, which must be known by all shareholders, managers and collaborators of Agropecuaria Aliar S.A., with the purpose of providing guidance on appropriate management and treatment if any warning signs are identified.


Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 2008-16 Minjusticia

The definitions, policies and procedures described in this program apply to all the company's operations nationwide, as well as to all its groups of interest.

3. REFERENCE DOCUMENTS

- Circular 100-000011 of August 9, 2021 from the Superintendence of Companies
- Law 1778 of 2016: anti-corruption law
- Law 2195, January 18, 2022
- SAGRILAF Manual.
- ISO 26000 Social Responsibility Guide (6.6.3)

4. DEFINITIONS

Ethics: A set of organizational values and principles that guide the making of actions and decisions, even in the absence of prescribed rules or policies.

Transparency: Social value that generates trust, security, clarity and honesty about actions; It refers to doing and showing things as they are.

Corruption: All conduct aimed at a Company benefiting, or seeking a benefit or interest, or being used as a means in the commission of crimes against the public administration, or public assets or in the commission of Transnational Bribery behaviors.


Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/91 - Manizuela

Transnational Bribery: It is the act where employees, contractors, administrators, or shareholders of the company: directly or indirectly give, offer or promise, to a foreign public servant: sums of money, any object of pecuniary value or other benefit or utility, in exchange for the foreign public servant performing, omitting or delaying any act related to the exercise of his or her functions and in relation to an international business or transaction.

Fraud: Any action contrary to truth and righteousness that harms the person against whom it is committed.

Bribery: Giving money or gifts to someone to get something illegally.

Due Diligence: Refers, in the context of this Program, to the constant and periodic review and evaluation process that must be carried out on the Risks of Corruption or Risks of Transnational Bribery to which the company is exposed.

Compliance Officer: Refers to the collaborator of Agropecuaria Aliar S.A., appointed by the Board of Directors, to promote and develop the Business Ethics and Transparency Program.



Silvio A. PUERTAS P.
TRADUCTOR - INTERPRETE ESPECIAL - INGLES
Resolución No. 0941 - 30/03/96 Minjusticia

PEP: It means Politically Exposed Person, which refers to public servants of any national and territorial public administration system, when, they have, under their direct responsibility or by delegation, the general management of the formulation of institutional policies and the adoption of plans, programs and projects, direct management of assets, money or values of the State, in the positions they occupy; or the functions of the area to which they belong or the profile of the employment they occupy. These could be through expenditure management, public procurement, investment project management, payments, settlements, administration of real estate and personal property. It also includes Foreign PEPs and PEPs of International Organizations.

PTEE: Transparency and Business Ethics Program

Compliance Program: organizational structure, processes and internal control environment, which promote compliance with the law, regulations and standards of conduct.

Corruption Risk: It is the possibility that, by action or omission, the purposes of public administration are diverted, or public assets are affected for a private benefit.



Silvio A. Puertas P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 2008/MINJUSCIC

Transnational Bribery Risks or ST Risk: It is the possibility that a legal entity, directly or indirectly, gives, offers or promises to a Foreign Public Servant any sums of money, objects of pecuniary value or any benefit or utility in exchange for said server public performing, omitting or delaying any act related to his functions and in relation to a Business or International Transaction.

Foreign 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 foreign 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 subjected to the will of the State, its political subdivisions or local authorities, or a foreign jurisdiction. It will also be understood as any official or agent of an international public organization who holds the aforementioned quality.

5. CONTENT

5.1 POLICY

The Business Transparency and Ethics Program establishes the policies that rule the transactions and businesses carried out by the company, always promoting ethical,

Silvio A. Puertas P.
TRADUCTOR e INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/08/96 Minjusticia



transparent and honest conduct among all collaborators, through the values and principles contained in the Company's Code of Ethics.

5.1.1 ABOUT VALUES

1. Ethical and transparent conduct at Aliar S.A. is based on the following personal values:

- **Honesty:** It means being coherent between thinking and acting; being transparent in every action, having the courage to always tell the truth, without saying or doing things that harm others.
- **Commitment:** It goes beyond fulfilling an obligation, it implies putting our capabilities into play to carry out what has been entrusted to us, acting with rectitude, loyalty, transparency and honesty. It is what makes a promise real.
- **Responsibility:** It means reflecting, managing, guiding and evaluating the outcome of each action, accepting its consequences and facing them in a positive and comprehensive way.
- **Respect:** It means recognizing in oneself and in others their rights and virtues with dignity, equity and justice, which requires from each person a kind, courteous and ethical treatment towards everyone and everything.



Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 2010/06 Municipalidad

2. In order to form and strengthen a team of excellent ethical and professional quality, the following organizational values are established:

- **Teamwork:** It is the ability to establish relationships of participation and cooperation, sharing resources and contributing to the achievement of the organization's objectives, jointly promoting ethical, transparent and honest practices.
- **Search for Excellence:** It is the commitment of all workers to the efficiency and effectiveness of the processes they participate in, thereby guaranteeing continuous improvement, framed in corporate values.
- **Service Orientation:** To satisfy the needs, expectations and desires of customers, both internal and external, providing a prompt solution, thereby guaranteeing their total and complete loyalty, transmitting trust and confidence, through actions framed in solid corporate and personal values.
- **Assertive Communication:** To listen, understand and be understood appropriately, exchanging ideas, thoughts and feelings in an atmosphere of cordiality, understanding and conciliation.



Silvio A. FUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 2019/96 Ministerio

5.1.2 ABOUT THE PRINCIPLES

3. As part of the compliance procedures of the Transparency and Business Ethics Program, the 9 principles that must guide the actions of the collaborators, partners and directors of Agropecuaria Aliar S.A. are established:

- Principle of Honesty: All actions carried out by the collaborators, partners and directors of Agropecuaria Aliar and other interest groups must always reflect rectitude, truthfulness and honesty.
- Principle of Trust: The company is based on trust in the rectitude and honesty of its collaborators, shareholders and managers in the actions and tasks they carry out.
- Principle of Legality: All actions carried out by the collaborators, shareholders and directors of Agropecuaria Aliar must be faithfully framed in the applicable laws.
- Principle of Transparency: The actions carried out by the collaborators, partners and directors of Agropecuaria Aliar must be clear, precise, supported and verifiable in the event of any internal or external requirement or clarification.



Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 31/01/96 Mijeración

- Principle of Loyalty: Every employee of Agropecuaria Aliar must report any act related to corruption, bribery, fraud or any other similar act that violates the principles, values and policies regarding ethics and transparency established by the Company.

- Principle of Gender Equality: Collaborators, shareholders and managers in the exercise of their functions must keep in mind the equality between women and men as a condition of social justice and human rights in such a way that women and men have the same opportunities, conditions, and forms of treatment.

- Principle of respect for child labor: The Company in the development of its corporate purpose will comply with the provisions of Law 1098 of 2006, code of childhood and adolescence (or the norm that replaces or modifies it), as a commitment to protection comprehensive protection of children and adolescents, guaranteeing the exercise of their rights and freedoms.

- Principle of Integrity: The actions of the collaborators, partners and directors of Agropecuaria Aliar S.A. must be framed in the values and principles established in this manual and in the Code of Ethics established by the Company.



Silvio A. PUERTAS P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 30/08/96 Minjusticia

- Compliance Principle: The Company always acts in accordance with the internal and external standards applicable to the different operations to achieve its objectives.

5.1.3 GENERAL POLICIES

4. The policies, principles and procedures established in this program are to be strictly followed by all employees of Agropecuaria Aliar; any deviation or non-compliance will be classified as a serious offense and will be dealt with in accordance with the Company's disciplinary processes.

5. No collaborator of Agropecuaria Aliar S.A. is authorized to request benefits or special treatments from any entity or public official; likewise, any type of deviation from the procedures to favor the involvement of any counterparty is prohibited.

6. No collaborator of Agropecuaria Aliar will offer, promise, accept or request, directly or indirectly, favors or perks in order to persuade or coerce the obtaining of authorizations or advantages in any business or transaction of any nature.

7. No collaborator of Agropecuaria Aliar should accept perks to obtain preferential treatment, or to evade the control procedures established by the Company.

Any related situation must be reported immediately to the Compliance Officer, or using the channels established for reporting unethical conduct.


Silvio A. FUERTAS P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/96 Minjusticia

8. The actions of Agropecuaria Aliar's collaborators and the execution of all operations will be framed in full compliance with applicable laws, rules and regulations.

9. Occasionally, within the performance of duties, an Aliar collaborator may accept attention from a third party only under the following conditions:

- That in exchange it is not required to grant any advantage, omit any control or evade procedures in favor of a client, supplier, contractor, employee or authority.
- That any meeting, event or invitation is preceded by ethical, transparent and honest conduct on the part of Aliar S.A.'s collaborator, always reflecting the corporate and personal values established by the company.
- That this type of meetings have a legitimate commercial purpose and that the involved costs are reasonable.
- That any invitation or gift from a third party be reported to the immediate superior to evaluate compliance with the provisions of this program.

10. Attention to public officials must be done through bosses, directors or managers. Any irregularity, proposal or request outside the regulatory terms must be immediately reported to the Compliance Officer.


Silvio A. FUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 2008/96 Miquisñin

11. The issuance of company information to third parties (public or private) must be done by bosses, directors or managers, as the case may be.

12. The Company will pay compensation, which includes commissions, salaries and/or work bonuses to employees in accordance with the provisions of the salary policy (GES-PO-010).

13. Payments made to Contractors will be under the purpose of each contract, these contracts must establish clauses that commit the counterparty to carry out what is established herein and, in turn, to prohibit acts of corruption, bribery and/or transnational bribery, in addition to following everything established in the suppliers' and contractors' manual (CAD-MA-001).

14. Payments corresponding to the execution of contracts with contractors must be made directly to the counterparty. In the event that payments are required to be made to third parties other than the contractor, the Management in charge and the Compliance Officer must be notified for their respective analysis and approval.

15. Agropecuaria Aliar S.A. requires that expenses related to food, lodging and travel activities be reasonable and in good faith and are related to the supply, demonstration or explanation of products or services, or be necessary in the



Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/08/96 Minjusticia

development of the functions of the Company's employees and to comply with the applicable law. Travel expenses (food, lodging, transportation and travel expenses abroad) are subject to the procedure for recognition of travel expenses (GES-PR-005).

16. Any donations or free deliveries must serve noble causes, be reasonable and in good faith. These operations will not be intended to affect ethics and transparency, or to lead to actions that violate regulations, laws and/or policies regarding C/ST risk management.

5.1.4 POLICIES ON ACTING WITH CUSTOMERS

17. All clients linked to the company must go through the due diligence procedure in knowledge of counterparties established in the SAGRILAF system.

18. Any commercial relationship with politically exposed persons must be analyzed by the Compliance officer and approved by Commercial Management.

19. The Company will not participate in any form of business, transaction or commercial agreement, related to bribery, corruption or fraud.


Silvin A. PUERTAS P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 2004/96 Minjusticia

20. Any free delivery made to clients or potential clients must be strictly ruled by what is defined in the free delivery procedure established by the company.

21. No Aliar collaborator will promise gifts in cash or in kind to public servants, directly or indirectly, in order to accelerate administrative approval acts that are convenient to speed up or benefit any negotiation or tender; any sample or free delivery must be carried out following the established procedure, with the corresponding approvals.

22. It is prohibited to accept expensive trips or costly gifts¹ from a client or potential client. If an invitation or similar is received, you must immediately report it to the compliance officer.

23. Any negotiation with state entities must be carried out in accordance with the established procedures regarding public contracting and purchasing, and must be done directly through the channels provided by the State.

24. If any unethical behavior is apparent that may lead to bribery, fraud or any deviation from the applicable procedures or laws, it must be reported immediately to

¹ An expensive gift refers to valuable items such as jewelry, appliances, trips, courses, bonuses, money, among others. A regular and acceptable gift could be advertising material (pens, diaries, mugs, etc.)

the Compliance Officer to proceed with the inactivation of the client or with the interruption of the linking process.

5.1.5 POLICIES ON ACTING WITH SUPPLIERS AND CONTRACTORS

25. All suppliers and contractors linked to the company must go through the due diligence procedure in the knowledge of counterparties established in the SAGRILAF system.

26. Any commercial relationship with politically exposed persons (PEP) must be analyzed by the Compliance Officer and approved by Purchasing Management.

27. All commercial purchasing or contracting processes must strictly follow the guidelines established in the suppliers' and contractors' manual, established by the company.

28. The Company will not participate in any form of business, transaction or commercial agreement, related to bribery, corruption or fraud.

29. Agropecuaria Aliar employees will not receive presents or personal gifts from a supplier or contractor that intend to influence or coerce a decision or a business relationship.


Silvio A. Puertas P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 2018/96 Minjusticia

30. Accepting expensive trips or gifts from a supplier or potential supplier (or contractor) is prohibited. If an invitation or similar is received, you must immediately report it to the compliance officer.

31. It is prohibited to receive any type of gift or personal attention from a supplier or potential supplier.

32. All relationships with suppliers and contractors, national or foreign, must strictly comply with applicable legislation and defined internal procedures.

33. All transactions with foreign suppliers must be strictly framed in the import procedure defined by the company and the supports for said operations must be properly guarded, in accordance with what is established in the procedure.

34. Any irregularity presented during a negotiation with a supplier or potential supplier, which represents a risk of bribery, fraud, corruption or transnational bribery, must be immediately reported to the Compliance Officer.



Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/01/96 Ministerio

35. Any payment made to contractors may be subject to audit by the Compliance Officer in order to determine that the payment made is reasonable with the operation carried out, taking into account aspects such as:

- a. Object of the contract
- b. Contract value
- c. Contract period
- d. Need for licenses and/or permits for the execution of the contract.

5.1.6 POLICIES ON ACCOUNTING RECORDS

36. The company must truly reflect all transactions carried out in its accounting records. Agropecuaria Aliar's collaborators must not change, omit or manipulate records to hide improper management or fraudulent operations.

37. All accounting records must be supported by the corresponding documents, according to the applicable legislation, according to the type of transaction.

38. Any anomaly or registration requested outside the established procedures regarding purchase, sale or any other cause, ought to be reported to the Compliance Officer.


Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/08/96 Mijusticia

39. Any deviation or fraud alert identified in the accounting operations internal controls, must be immediately reported to the Compliance Officer.

40. If a record of operations out of the ordinary course of business is apparent, the Financial Management and the Compliance Officer must be immediately informed.

5.1.7 POLICIES ON ACTING WITH STATE ENTITIES

41. All procedures required with State entities must obey the regulations in force and must be informed to the Legal area for their respective support.

42. Facilitation payments are payments made to Public Officials in order to guarantee or speed up routine government actions such as obtaining a license, telephone service, or others. These payments are illegal under most Anti-Corruption Laws. Facilitation payments by Agropecuaria Aliar S.A., and its employees and third parties acting on its behalf or representation are prohibited under this policy.

43. No Aliar employee may offer gifts in any form to public officials.

44. No Aliar collaborator will promise or give gifts in cash or in kind to public servants, directly or indirectly, in order to speed up administrative acts, issue concepts or grant licenses, registrations, permits or any other that must be processed.


Silvio A. Puertas P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/96 Minjusticia

45. Any inappropriate or unethical conduct by a public official, which is detected by any employee of the company, must be reported immediately to the Compliance Officer, or anonymously through the channels provided for this purpose.

5.1.8 POLICIES ON SUPPORT CONSERVATION

46. The PTEE 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.

5.2 MODALITIES AND ACTIONS THAT GO AGAINST ETHICS AND TRANSPARENCY

5.2.1 Conflict of interest: this modality occurs when a collaborator has a personal interest that can affect his or her judgment and arbitrarily interfere about a decision, business or any type of procedure. If presented, every collaborator has the duty to officially inform the Ethics Committee, where the relationship will be evaluated and find out whether there is a conflict of interest, while determining the pertinent management.

Among the situations that may represent a conflict of interest are:

- To offer a good or service that can lead to a business with the company.
- Family relationships with employees, clients, suppliers or contractors.


Silvio A. Puentes P.
TRADUCTOR - INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/98. Minjестión

- Provision of services to third parties linked to the company.
- Participation in boards, control bodies and/or administration of companies linked to the company.
- Sentimental relationships with employees, clients, suppliers or contractors.

5.2.2 Bribery: Bribery is the act in which money, gifts or special presents are given to someone, with the purpose of obtaining a benefit easily or illegally. This type of unethical actions can occur in both public and private sectors. Among the situations that may represent a bribe are:

- To offer gifts, money, trips or favors to a third party with the purpose of receiving any benefit in favor of a business, tender, procedure or special treatment.
- To receive gifts, money, trips, or favors from a third party with the purpose of being granted any benefits, contracts without due process or evading controls or procedures
- Giving gifts, money, trips, favors or anything similar for the purpose of receiving a special treatment, evasion of any control or special treatment outside of applicable procedures or standards by a public or private counterparty.

If you become aware of any bribery alert, it is the employee's duty to immediately report it to the Compliance Officer or through the unethical behavior reporting channels established by the company.

5.2.3 Fraud: Any action that goes against truth and righteousness intended to harm someone or the company will be understood as a fraudulent action. It refers to the malicious omission of some procedure or control with the purpose of taking advantage of a situation or taking possession of property of the company or of another person. Among the situations that may represent fraud are:

- Malicious omission of procedures and controls.
- Malicious concealment of information.
- Malicious distortion or alteration of information related to inventories, money, results and operations.
- Malicious acts that seek one's own benefit or that of a third party.
- Generation of reports with false or inaccurate information.
- Improper use of confidential information.
- Misappropriation of resources of the company or a third party related to the company.

If you become aware of a fraud alert, you must immediately inform the Compliance Officer or report through the means provided by the company for reporting unethical conduct.

5.2.4 Corruption: Any action aimed at a particular benefit or interest, to the detriment of resources or public administration.

5.3 ELEMENTS OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

5.3.1 Design and approval of the PTEE

The design of the Transparency and Business Ethics Program is in charge of the Compliance Officer and the Legal Representative, taking into account the characteristics of the Company, the operations and the analysis of the associated risks.

The approval of the PTEE, as well as any modification or update is up to the Board of Directors, and must be supported by meeting minutes.

Agropecuaria Aliar S.A. will update its PTEE program and the policies contained in general terms every two years. However, if changes occur in the processes, procedures, operations or activities associated with the risks identified and evaluated in the C/ST risk matrix, and that after a re-evaluation of probability and impact


Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 31/08/96 Miquisñin

under the new conditions alter the risk level, the relevant updates to the case must be generated.

5.3.2 Audit and compliance with the PTEE

The audit and verification of compliance with the provisions of this program and related policies is the responsibility of the Compliance Officer designated by the Company's Board of Directors. In the event of a temporary absence of the Compliance Officer, the Board of Directors must designate a substitute.

The Compliance Officer must generate routine audits of the different processes, in order to evaluate compliance with the policies and procedures framed in this manual, evaluate the risks and controls associated with each process and identify opportunities for improvement in terms of corruption and transnational bribery risk management.

The Company defines the three lines of defense to prevent and control the risk of corruption and transnational bribery² and establish disabilities between the different roles of the Company.

² Basel Banking Supervision Committee, 2014. "Appropriate management of risks related to money laundering and the financing of terrorism". Paragraphs 19 to 27. https://www.bis.org/publ/bcbs275_es.pdf

[Infographics in the original]

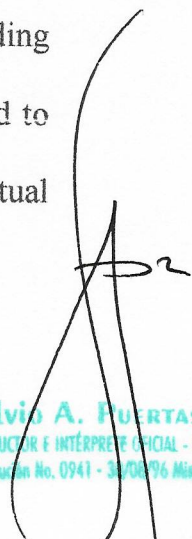
5.3.3 PTEE Dissemination and Training

The Transparency and Business Ethics Program must be disclosed annually to all collaborators within the company so that it is assimilated and implemented as part of the organizational culture.

For this activity, the official means of communication and internal culture provided by the Company will be used. Likewise, it must be disclosed to other interested parties as required.

5.3.3.1 Training for contractors

- The PTEE manual and the code of conduct for suppliers and contractors must be made known to contractors during the process of joining the Company, and reading and acceptance must be substantiated.
- Every contractor must receive training in the fight against corruption, including at least the following content: objective of the PTEE, commitments or duties regarding ethics and transparency, and the channels to generate reports of conduct related to Corruption. These spaces will be opened up upon beginning of the contractual relationship.


Silvio A. FUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/JUN/96 Minjusticia

- During the contractual relationship, the Compliance Officer will carry out awareness campaigns to raise awareness regarding the C/ST risks to which the Company is exposed.

The PTEE training must be led and directed by the Compliance Officer with support from the Human Management Area, using the tools and means provided by the Company.

The training process must be supported with an attendance record, containing the date and attendees. Additionally, a record of evaluation on the topic presented must be kept, and it must be stored in the compliance folder available in Drive.

5.3.4 Communication channels

Agropecuaria Aliar S.A. establishes an ethical line so that any collaborator, student in practice, supplier, contractor, shareholder, client or in general any person who wishes to report any type of anomaly, affectation or incident that goes against ethics and/or or work conduct in the organization, can communicate it at any time by any of the established means:

- Email: eticaytransparencia@aliar.com.co
- Ethics and transparency mailboxes arranged in each region (physical mailboxes).


Silvio A. PUERTAS P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 31/08/16 Minjusticia

- Electronic mailbox for reporting unethical conduct.

Any collaborator, student in practice, supplier, contractor, shareholder, client or in general any person, may express their comments or reports by any means anonymously and confidentially, when they consider that any conduct:

- Could affect others or the company;
- Goes against company policies and procedures;
- Goes against corporate and personal values;
- Goes against laws and regulations;
- Lacks ethics and good procedure;
- Could lead to acts of corruption, bribery, fraud or anything similar.

* All reports will be handled under absolute privacy and confidentiality.

5.3.5 Functions and persons responsible for the PTEE

Board of Directors

- * To issue and define the Compliance Policy
- * To define the profile of the Compliance Officer in accordance with the Compliance Policy, without prejudice to the provisions of this Chapter.
- * To appoint the Compliance Officer.
- * To approve the document that contemplates the PTEE.


Silvio A. PUERTAS P.
TRADUCTOR / INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/03/96. Ministerio

- * To assume a commitment aimed at preventing the Risks of corruption and/or transnational bribery, so that the Bound Entity can carry out its business in an ethical, transparent and honest manner.
- * To ensure the supply of economic, human and technological resources that required by the Compliance Officer to carry out his work.
- * To order pertinent actions against shareholders or collaborators, when they violate the provisions of the PTEE.
- * To lead an appropriate communication and pedagogy strategy to guarantee effective dissemination and knowledge of the Compliance Policies and the PTEE to Employees, Shareholders, Contractors and other identified concerned parties.

Legal representative

- * To present the PTEE with the Compliance Officer, for approval of the board of directors.
- * To provide effective, efficient and timely support to the Compliance Officer in the design, direction, supervision and monitoring of the PTEE.
- * To certify compliance with the provisions of this Chapter to the Superintendence of Companies, when required.



Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30 DE 06 Miquelón

* To 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.

Compliance Officer

* To present the PTEE with the legal representative, for approval of the board of directors.

* To present reports to the board of directors at least once a year. Per minimum, the reports must contain an evaluation and analysis of the efficiency and effectiveness of the PTEE and, if applicable, to propose the respective improvements. Likewise, to show the results of the Compliance Officer's management in compliance with the PTEE.

* To ensure effective, efficient and timely compliance with the PTEE.

* To set a Risk Matrix and update it according to the needs of the company.

* To define, adopt and monitor actions and tools for Risk detection.

* To ensure the implementation of appropriate channels to allow anyone to confidentially and securely report any non-compliance with the PTEE and possible suspicious activities related to Corruption.

* To verify the proper application of protection measures for reporters and prevention of workplace harassment in accordance with the law.



Silvio A. PUERTAS P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/96 Minjusticia

- * To establish internal investigation procedures to detect breaches of the PTEE and acts of Corruption.
- * To coordinate the development of internal training programs.
- * To verify compliance with Due Diligence procedures.
- * To ensure the proper filing of documentary supports and other information related to the management and prevention of the Risk of corruption and transnational bribery.
- * To design methodologies for classification, identification, measurement and control of risk of corruption and transnational bribery that will be part of the PTEE.
- * To carry out the evaluation of compliance with the PTEE and the risk of corruption and transnational bribery.

All areas

- * Know, comply with and spread all aspects related to the PTEE.
- * To give strict compliance to the policies and procedures defined by the Company in the PTEE.
- * Immediately report to the Compliance Officer any act or warning sign related to unethical conduct, or that is related to corruption and/or transnational bribery.

Internal audit

* To include within the annual audit plan the review of the effectiveness and compliance of the PTEE, in order to determine the existence of deficiencies or deviations in the system and their possible solutions. In this sense, the result of said audits must be communicated to the Legal Representative and the Compliance Officer.

5.4 CORRUPTION AND TRANSNATIONAL BRIBERY RISK MANAGEMENT

The following stages are established for the identification, prevention, control and management of the risk of acts of corruption and transnational bribery.

For risk management, the PTEE must have a risk matrix for the management and control of risks that allows the identification, measurement or assessment, as well as the control and monitoring of the risk of corruption and transnational bribery in a timely, effective and efficient manner. It must be permanently monitored and the analysis must be contained in the management reports.

5.4.1 Identification of risk factors

In order to identify risks, information is collected through surveys applied to the different processes and levels of operation. The consolidation and updating of the corruption and fraud risk matrix will occur on a quarterly basis.

Next, the classification of risk factors is determined in accordance with the economic activity of Agropecuarias Aliar S.A.: Jurisdiction, economic sectors, operations and counterparties and/or final beneficiaries of the counterparties, as well as the possible elements or causes generating the risk of corruption and/or transnational bribery.

Jurisdiction

Risks of Transnational Bribery 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 effective regulations to fight corruption and the lack of transparent policies regarding public procurement and international investments. When international transactions are required, it is necessary to investigate the corruption control structure as part of due diligence.

When the company carries out international negotiations, it must investigate in accordance with the classification formulated by the National Tax and Customs Directorate – DIAN, if the country is considered a tax haven. In this case, you must inquire with the legal representative whether to proceed with the negotiation or not.

Economic sector


Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - A2/08/96 Minjushicio

It should be investigated whether the economic sector with which a certain transaction is to be carried out is considered to have a high risk of corruption; for this, you can refer to the risk reports issued by the OECD. In the event that a possible risk is evident, it is necessary to analyze the case with the legal representative, to define whether or not it is feasible to carry out the transaction.

Operations

The following transactions or operations are understood as possible generators of acts associated with Corruption or Transnational Bribery:

- * Free deliveries such as donations.
- * Imports and exports.
- * Operations carried out with PEP's

In all cases, said operations must be supported in accordance with the procedures that determine their legality.

Counterparties and/or the final beneficiaries of the counterparties

According to the OECD, 71% of Corruption cases involved the participation of third parties, such as Contractors and Subordinated Companies.


Silvio A. PUENTES P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/08/96-Minjusticia

The risk increases in countries that require intermediaries to carry out an International Business or Transaction, in accordance with local customs and regulations.

Without exception, due diligence procedures must be applied to the knowledge of counterparties, defined by the Company.

5.4.2 Measurement or assessment

For this stage, the Company has structured a matrix for the consolidation of the risks identified according to each factor, assessing the impact and probability of occurrence according to the following assessment:

Impact measurement

Score	Description	Item	Specificity economic loss	Economic impact Description (COP)
5	Very critical	<ul style="list-style-type: none"> Reputational damage and loss of credibility with national and international significance. 	<ul style="list-style-type: none"> Fines from the Supervisor (if any). Decrease in 	Economic losses greater than COP42,000MM. (Greater than

		<ul style="list-style-type: none"> • Sanctions of suspension, disqualification or removal of administrators, Compliance Officer and/or other officials, or sanctions for criminal proceedings. • Loss of a customer and/or supplier critical to the operation. • Materialization of an act of corruption. 	<ul style="list-style-type: none"> • income due to bad image or negative publicity. • Compensation for damages. 	30% of Ebitda).
4	Critical	<ul style="list-style-type: none"> • Reputational damage and loss of credibility with significance in 1 national department or district. • Sanctions of suspension of the regulator. 	<ul style="list-style-type: none"> • Susceptible to large sanctions from the Supervisor (if any) of a pecuniary nature. 	<ul style="list-style-type: none"> Economic losses greater than or equal to COP 21,000 MM and less than COP 42,000 MM. (Greater than

Silvio A. PUERTAS P.
 TRADUCTOR E INTERPRETE OFICIAL - INGLES
 Resolución No. 0941 - 30/07/96 Ministerio

		<ul style="list-style-type: none"> • Loss of 1 key client. • Contagion effect on allied companies. 	<ul style="list-style-type: none"> • Compensation for damages • Decrease in income due to bad image or negative publicity 	<p>15% and less than 30% Ebitda).</p>
3	Mild	<ul style="list-style-type: none"> • Reputational damage and/or loss of internal credibility. • Contagion effect on allied companies. • Penalties for regulatory notes • Loss of non-critical customers or suppliers. 	<ul style="list-style-type: none"> • Susceptible to sanctions from the Supervisor (if any). • Compensation for damages. • Decrease of income from bad image or negative 	<p>Economic losses greater than or equal to COP 7,000 MM and less than COP 21,000 MM. (Between 5% and 15% Ebitda).</p>

			publicity.	
2	Minor	<ul style="list-style-type: none"> • Reputational damage and/or loss of internal credibility. 	<ul style="list-style-type: none"> • Reprimand or moderate sanction from the Supervisor (if any), of a pecuniary nature. • Decrease of income due to bad image or negative publicity. 	<p>Economic losses greater than or equal to COP 700 MM and less than COP 7,000 MM.</p> <p>(Between 0.5% and 5% of Ebitda).</p>
1	Insignificant	<ul style="list-style-type: none"> • Does not generate reputational damage. • Does not generate sanctions. • Does not cause harm. • Does not cause loss of clients or decrease in 	<ul style="list-style-type: none"> • Not applicable 	<p>Economic losses less than COP 700MM.</p> <p>(Less than 0.5% of Ebitda).</p>

		income due to discredit. • It does not produce a contagion effect.		
--	--	---	--	--

Probability of occurrence scale

Assessment	Descriptor	Definition
5	Almost certainly	The event could occur at least once a month.
4	Probable	The event could occur at least once every 6 months.
3	Possible	The event could occur once a year.
2	Unlikely	The event could occur once every three years.
1	Rare	The event could occur once every 5 years or more.

Inherent risk

For the evaluation of the risk inherent in each identified risk, a score of impact and probability of occurrence must be assigned; these will determine how critical the risk can become according to the scale.

5.4.3 Risk Control



Silvio A. FUERTAS P.
 TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
 Inscripción No. 0941 / 30/08/76 Ministerio

For the control stage, the risk matrix associated with C/ST has been structured, where the risk, its causes, the class, the probability and impact evaluation, the controls, those responsible for these, and the evaluation of effectiveness are determined.

To calculate the residual risk, the risk matrix must evaluate the effectiveness of the control associated with each risk, on a scale that is less than or equal to the probability and impact rating, thus the residual risk will be equal to: the probability minus the effectiveness of controls.

For the control stage within the risk matrix, the following must be established:

- * Actions that attack the causes of risks, that is, generating a description of the control.
- * The person responsible for executing the controls.
- * The type of control.
- * Periodicity.
- * The document or support that guarantees the execution of the control
- * The effectiveness of each control.
- * Control monitoring, recording the execution of each action.

5.4.4 Risk Monitoring

Risk monitoring must be conducted according to the following table, which determines the periodicity in which the risk must be monitored according to the level of risk:

Risk level	Color	Follow-up	Treatment
Acceptable risk	[dark green]	Annual	Assume
Acceptable risk, more follow-up	[light green]	Semi-annual	Assume/reduce
Tolerable risk	[yellow]	Quarterly	Reduce
High risk	[orange]	Two-monthly	Reduce
Extreme risk	[red]	Monthly	Reduce

It should be verified that residual risks are located in the controlled space of the heat map and it should be frequently compared to the inherent risk result. In the event that after executing the controls, a risk is located in the improvement or alert space, the controls must be immediately reconsidered and their effectiveness reassessed.

To calculate the residual risk, the risk matrix must evaluate the effectiveness of the control associated with each risk, on a scale that is less than or equal to the probability and impact score, thus the residual risk will be equal to: the probability minus the effectiveness of the controls.

Silvio A. Puertas P.
 TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
 Resolución No. 0941 - 30/08/96 Minjusticia

[Images on the original p. 22]

5.5 DUE DILIGENCE

5.5.1 Measures for the management of PEPs

1. Relationships with people who hold or have held public positions, in accordance with the provisions of decree 830 of 2021; who, by reason of their position, manage or administer public resources; or who hold or have held some degree of public power; require the Intensified Due Diligence process as established in the SAGRILAF manual.

2. The involvement of politically exposed persons must be approved by the Legal Representative or the management in charge of the process, with prior analysis by the Compliance Officer.

3. People who carry out verification on restrictive lists must immediately inform the Compliance Officer of all developments related to PEPs.

5.6 WARNING SIGNALS

Below are some warning signs of corruption and transnational bribery.



Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/08/16 Minjusticia

a) 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 excess discounts or refunds.
- Foreign operations with highly-sophisticated contractual terms.
- Transfer of funds to countries considered tax havens.
- Operations that do not have a logical, economic or practical explanation.
- Operations that are outside the ordinary course of business.
- Operations where the identity of the parties or the origin of the funds is not clear.
- Assets or rights, included in the financial statements, that do not have a real value or that 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 purpose, particularly if it is located abroad.
- Non-operational companies under the terms of Law 1955 of 2019 or that due to business development may be considered “paper” entities, that is, those that do not reasonably fulfill any commercial purpose.
- Companies declared as fictitious suppliers by the DIAN.


Silvio A. PUERTAS P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/96 Minjusticia

c) In the analysis of transactions or contracts:

- Contracts with contractors or state entities that show a façade 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 state Contractors or entities or significant changes without commercial justification.
- Payments to PEPs or people close to the PEPs.

5.7 REPORT OF COMPLAINT OF TRANSNATIONAL BRIBERY AND ACTS OF CORRUPTION

Acts related to transnational bribery must be reported to the Superintendence of Companies, at the following link:

https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-deDenuncias-Soborno-Internacional.aspx

Acts related to corruption must be reported to the Transparency Secretariat, in the anti-corruption observatory.

6. RECORDS

- CUMFT-008 LA/FT/FPADM/C/ST risk matrix format.
- CUM-FT-017 Compliance training control format.
- CUM-FT-012 Survey format for risk identification.


Silvio A. PUERTAS P.
TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
Resolución No. 0941 - 30/08/16 Minjusticia

- CUM-FT-011 Ethics committee minutes format.
- CUM-FT-003 Risk identification and evaluation report format.
- CUM-FT-009 Audit checklist format on due diligence in knowledge and connection of collaborators.
- CUM-FT-010 Audit checklist format on due diligence in knowledge and customer engagement.

7. ANNEXES

Does not apply.

8. CONTROL OF CHANGES

Date	Issue	Description
12/14/2021	01	Issue of the document.
03/22/2024	02	Adding new policies, updating the elements and stages of the Program.

Translator: SILVIO ALEJANDRO PUERTAS PINO

Resolution 0941 of August 30th 1996 from the Ministry of Justice

Silvio A. Puertas P.
 TRADUCTOR E INTÉRPRETE OFICIAL - INGLÉS
 Resolución No. 0941 - 30/08/96 Minjusticia