



HUMAN RIGHTS



Human Rights

As signatories of the Global Compact since 2009, our commitment to Human Rights is a fundamental principle guiding the development of our business. This is why we promote fair and equitable working relationships, providing our employees with opportunities for comprehensive growth within an organizational climate of mutual respect, through communication, motivation, education, leadership, and teamwork mechanisms.

We operate under an inclusive approach, which means that all our processes are conducted with transparency and objectivity, embracing all individuals without bias based on race, religion, sexual orientation, etc.





Colombina Business Group, true to its principles and values, has been committed to respecting and promoting human rights as a fundamental principle for the development of its operations, in line with the International Bill of Human Rights, the United Nations Global Compact, and the OECD Guidelines for Multinational Enterprises. Colombina continuously conducts a Due Diligence Process according to the standards set forth in the United Nations Guiding Principles on Business and Human Rights, which includes the following measures:

- Training employees and suppliers on Human Rights.
- Integrating human rights risks into the corporate risk management system.
- Periodically conducting Human Rights Impact Assessments.
- Implementing a prevention and mitigation strategy for human rights impacts, both within the company and throughout its value chain.
- Developing a communication and engagement strategy with key stakeholders, including strengthening accessible mechanisms for complaints and grievances related to human rights.
- Regularly reporting on human rights risk management within the Sustainability Report.

Human Rights Policy





Human Rights Policy

Colombina is committed to respecting the rights of all individuals and communities, with a special emphasis on those who are most vulnerable. Therefore, the company takes the responsibility to implement necessary measures to prevent any risks associated with human trafficking, child labor, or any form of modern slavery, whether within its own operations or through its commercial and supply chain relationships.

All Colombina employees are obligated to be aware of and contribute to the implementation of this Policy in their daily activities, and they must report any potential violations of the Policy to the company through established reporting mechanisms.

Furthermore, as stated in its Supplier Policy, Colombina requires its business partners, suppliers, and other third parties with whom it maintains business relationships to respect internationally recognized Human Rights. These requirements must be considered and managed within the scope of their activities and their business relationship with the Company.

Declaration on Commitment to HR

Colombina Business Group commits to conducting all its business activities within the framework of Human Rights, supporting and respecting their protection. To fulfill this declaration, the following actions have been determined:

- Conduct all business operations in accordance with respect for Human Rights and in compliance with international laws and treaties, such as the Universal Declaration of Human Rights, the ILO declarations, the United Nations Global Compact, and the OECD Guidelines for Multinational Enterprises.
- Ensure the life and safety of its employees through the implementation of a Health and Safety Management System at work and the promotion of self-care habits to prevent risky events.
- Publicly reject and condemn any abuse or violation of Human Rights and International Humanitarian Law (IHL).



Declaration on Commitment to HR

- Colombina Business Group is committed to providing dignified working conditions to all its employees, offering equal treatment without discrimination based on race, age, gender, color, origin, or sexual orientation. This commitment includes providing competitive salaries and benefits and ensuring a work environment that respects employees' time for family activities, among other initiatives.
- The company firmly rejects any form of forced labor or child labor throughout its value chain.
- Colombina actively promotes gender equality measures, combating discrimination, and ensuring equal access to opportunities and equity for both men and women within the organization. These principles are supported by the following actions:
- Establish measures and mechanisms to prevent, address, and penalize any form of harassment.
- Foster work environments free from violence, promoting employees' personal quality of life.
- Encourage work-life balance and support family life reconciliation.
- Promote gender equality conditions for all stakeholders related to the organization.
- The company conducts its operations with practices that respect and care for the environment, ensuring this commitment through an Environmental Management System certified under the ISO 14001 standard.
- Colombina actively encourages respect for and the promotion of Human Rights among its suppliers, contractors, partners, and all stakeholders. It respects the right to freedom of association and collective bargaining.



Declaration on Commitment to HR

- Colombina Business Group aims to consolidate an organizational culture based on ethics and transparency in all actions carried out by its employees during the course of business operations.
- The company provides its employees and stakeholders with tools to report risks or potential human rights abuses.
- Colombina values and justly recognizes the work of each individual, offering competitive and equitable salaries and benefits for both men and women, following the guidelines established by the ILO Convention 100.
- The company ensures clear and transparent communication regarding the nutritional profile of its products, empowering consumers to make informed purchasing decisions.
- Colombina prioritizes quality and food safety in its production processes, ensuring the highest standards are met.





Important milestones in human rights in recent years

2008

- Launch of the Colombina Ethics program

2011

- Creation of the Labor Relations and Non-Discrimination Policy

2014

- Signing of the Collective Convention with Sintracolombina Subdirectiva La Paila.
- Creation of the Supplier Policy.
- Formation of the Labor Equity Committee.
- Application of the labor equity diagnosis.

2009

- Adherence to the United Nations Global Compact.
- First Sustainability Report of the Colombina Group

2012

- Establishment of the Coexistence Committee

2015

- Signing of the Collective Convention with Sintracolombina Subdirectiva Colcauca

2010

- Launch of the first Business Ethics Policy.
- Creation of the Social Responsibility Manual for Suppliers

2013

- Launch of the first Responsible Code of Conduct.

2016

- Training of 383 employees in Human Rights.
- Obtaining the Equipares certification, Silver Seal with a rating of 99.5%.
- Creation of the Gender Equity Policy and the non-sexist communication manual.
- Training of 408 employees in Gender Equity.

2017

- Signing of the Collective Convention with Sintracolombina Subdirectiva Conservas.

2018

- Signing of the Declaration of Commitment to Human Rights.
- Training for 768 employees on Gender Equity and Human Rights.
- Training for 62 suppliers (transportation and chili growers) on Human Rights.
- Recognition granted by the Presidency of the Republic for the Gender Equity Silver Seal certification.
- Signing of a roadmap with the Mayor's Office of Santiago de Cali to establish human rights plans within the organization..

2019

- Implementation of Due Diligence processes in accordance with the United Nations Guiding Principles and the OECD Guidelines for Multinational Enterprises.
- Obtaining the Gender Equity Gold Seal.
- Approval of the Human Rights Policy.
- Application of the Human Rights Impact Study.

2020
2021

- Training for suppliers on Human Rights and Gender Equity.
- Application of the B System survey to suppliers, which includes aspects related to measuring Human Rights.

2022

- Update of the Risk Map.
- Application of a new Human Rights diagnosis.
- Development of an action plan.

2023

- Update on the Human Rights Course at the Corporate University
- Presentation of Internal Audit on Gender Equity Equipares / Management Verification 2022
- Application of Gender Equity Perception SurveyCreation of a Protocol/Guide for Human Rights AttentionCreation of the Sustainability, Human Rights, and Corporate Governance CommitteeDefinition of Monitoring IndicatorsRecertification of Equipares Gold Level

2024
2025

- Implementation of a new Human Rights assessment across 94% of operations.
- Implementation of the Human Rights assessment for a new group of suppliers. (95% of significant suppliers).

Diagnosis of Human Rights Management

- Since the adoption of the corporate Human Rights policy in 2018, Colombina has been strengthening the due diligence process in Human Rights within its own operations and across the supply chain. This policy explicitly outlines the company's responsibility to respect human rights and prevent any adverse impacts on them that may result from its activities and business relationships.
- We conducted a new assessment of our Human Rights management in 94% of our own operations (production plants, commercial districts, and headquarters). Additionally, this year, we evaluated a new group of smaller suppliers with opportunities for improvement in their human rights management to understand the current state of Human Rights management, identify weaknesses and strengths, and define measures focused on strengthening these practices and avoiding any human rights-related risks in their supply chain.
- For this assessment, we hired the external firm EQUILIBRE CONSULTORES, which conducted in-depth interviews with representatives of the participating supplier companies and our organization's employees.
- The assessment results allowed us to verify and adjust the evaluation of direct and indirect risks according to their probability and severity, as well as identify new inherent risks in the industry and the activities of its value chain. This was reflected in an update of our risk map, an exercise that is carried out every two years in the company.

Results of the Human Rights Management Diagnosis 2024

In the process of updating risks conducted, three new human rights-related risks were identified, two of which are indirect and one direct. Additionally, an adjustment was made to the assessment of 4 indicators, and 3 indicators had their wording adjusted.

Type of Risk	Mapped Risks	New Risks	Assessment Adjustment	Wording Adjustment	Total Human Rights
Direct Risks	6	1	2	1	7
Indirect Risks	10	2	2	3	12

- With the update of environmental risks, the updated Human Rights risk matrix takes a step forward in response to the demanding regulations in markets such as Europe, where value chains—especially agricultural ones—are expected to incorporate due diligence in Human Rights, including issues of deforestation and climate change.
- The update of the matrix took into account the current security risk situation in the country and the consequent risks to employees, contractors, and communities.

Results of the Human Rights Management Diagnosis 2024

- Colombina has made significant efforts towards adopting responsible business management practices in Human Rights in its own activities and business relationships.
- According to the observations recorded by the company in the diagnostic tool, Colombina's Human Rights policy has been communicated both internally and externally to all staff, suppliers, contractors, and other stakeholders. Additionally, Colombina has developed communication, outreach, and induction activities for employees, contractors, and contractor employees.
- Regarding the identification and evaluation of Human Rights impacts, Colombina has a Management System that integrates issues such as occupational health and safety, environment, discrimination, and gender-based violence in the workplace. Being associated with the business management system, these issues have work plans and assigned roles and responsibilities for their management.
- It is positively noted that Colombina engages external experts to identify and manage real and/or potential risks and impacts on Human Rights.
- Overall, Colombina has achieved an acceptable level in the adoption of due diligence in Human Rights at the corporate level.

Model of Due Diligence Management

1. Business Conduct

- Definition of Scope to ensure Human Rights issues:

Review and update of policies:

- Human Rights Policy
- Responsible Code of Conduct
- Labor Relations and Non-Discrimination Policy
- Supplier Policy
- Corporate Social Responsibility (CSR) Compliance Clause for Suppliers
- Equity and Inclusion Policy
- Due diligence process for new business relationships.

2. Prevention of Human Right Risk

- Public declaration of commitment to Human Rights.
- Review and management of the risk matrix associated with our operations and in the value chain.
- Human Rights diagnosis every 3 years, verifying the fulfillment of action plans.
- Diagnosis of suppliers through the B System platform.
- Implementation of action plans.
- Strengthening the knowledge of employees and the value chain through communication and training.

3. Human Rights Risk Management

- Establishment of reporting and complaints mechanisms.
- Monitoring of reported cases or situations through the established mechanisms.
- Remediation of cases, if necessary.

4. Reporting Mechanisms

- The company has reporting mechanisms as preventive measures that allow for the identification and establishment of plans for repair or improvement if necessary: Ethics Hotline, Coexistence Committee, Equity and Inclusion Committee, Corporate Website, Occupational Health and Safety Reporting Tool.

Model of Due Diligence Management

1. Business Conduct

Definition of the scope to ensure that Human Rights issues encompass employees, business relationships (joint ventures, mergers, acquisitions), suppliers, customers, contractors, and communities surrounding the plants. The issues included in our Human Rights scope are as follows.



Model of Due Diligence Management

1. Business Conduct

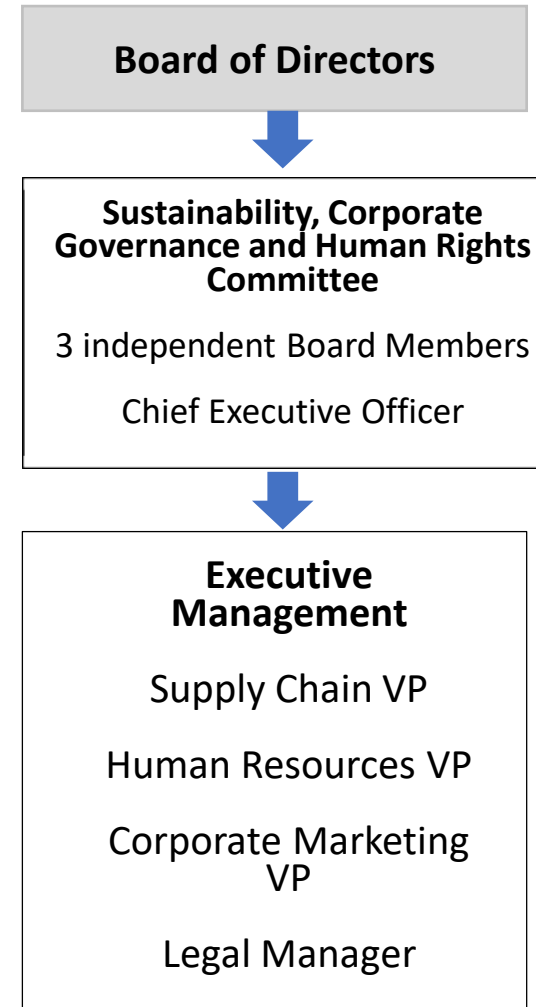
Likewise, taking into account that Colombina has been a signatory to the United Nations Global Compact Principles since 2009, in our code of conduct, as well as in the Supplier Policy, we explicitly state the following

1. Freedom of association and collective bargaining.
2. Prohibition of child labor, adhering to minimum age provisions, laws, and corresponding regulations.
3. Prohibition of forced labor and physical mistreatment of employees.
4. Elimination of discrimination. The sole basis for hiring, promotion, or training should be performance, skills, and experience.
5. Working hours and remuneration, fully complying with relevant legislation regarding wages, working hours, and benefits, and providing employees with opportunities to develop their skills and abilities.
6. Health and safety at work, reducing the risk of accidents, injuries, and any other health hazards.
7. Environmental care.
8. Integrity, respecting relevant laws and avoiding bribery and fraudulent practices, complying with tax requirements, anti-money laundering legislation, and respecting and promoting intellectual property.
9. Communication: Colombina will promote within the supply chain the replicability of the supplier policy and associated practices, so that they extend it to their own supplier network.
10. Supplier development to ensure compliance with quality and competitiveness standards. Programs like Big Brother and Supplier Certification have been implemented for this purpose.
11. Extended sustainability. We support our suppliers in their commitment to sustainability and encourage them to extend this commitment to their supplier network.

Model of Due Diligence Management

1. Business Conduct

We have a **Sustainability, Corporate Governance, and Human Rights Committee** responsible for monitoring the established plans to advance the management of the mentioned issues.



Model of Due Diligence Management

2. Prevention of Human Right Risk

➤ Business Conduct

- Our human rights due diligence process adopts a preventive approach to manage the company's impacts on human rights promptly and appropriately, contributing to the prevention and reduction of conflicts with stakeholders. To achieve this, we have collaborated with expert external consultants who have facilitated two-way dialogues among the company, employees, and actors in the value chain, strengthening trust-based relationships. Here are the actions taken in the process of preventing human rights risks:
- Public declaration of commitment to human rights.
- Review and management of the risk matrix associated with our operations and throughout the value chain.
- Human Rights diagnosis every three years to verify compliance with action plans and commitments established in the human rights declaration, including ensuring decent work and unequivocal rejection of forced labor, respecting freedom of association and the right to collective bargaining, eliminating child labor, ensuring equal remuneration, among others.
- Diagnosis of suppliers through the Sistema B platform.
- Implementation of action plans.
- Enhancing the knowledge of employees and the value chain through communication and training.



Model of Due Diligence Management

2. Human Rights Risk Prevention: Equity, Diversity, and Inclusion Management System

One of our main lines of action in the prevention of human rights risks has been the promotion of gender equity and workplace inclusion. These principles are deeply embedded in our organizational culture, as we understand that respect for diverse perspectives, experiences, and skills strengthens organizations and contributes to positive social transformation.

We believe that preventing risks such as discrimination, exclusion, and workplace inequality begins with recognizing that, while we are not all the same, we all deserve equal treatment, equitable access to opportunities, and an environment where differences become an advantage to achieve better results, grow as an organization, and build a fairer society.

In 2013, we signed the Agreement of Will with the Ministry of Labor and UNDP, which marked the beginning of the implementation of the Gender Equality System – Equipares. This tool has enabled us to manage the company's cultural transformation in a structured way and to close gender gaps, thereby mitigating risks related to discrimination, harassment, and other forms of rights violations in the workplace.

Since then, we have developed action plans focused on enhancing human talent management, promoting equitable and safe conditions across the eight organizational dimensions: recruitment and selection, training and development, capacity building, compensation, work-life balance, work environment and health, communication, and prevention of sexual and workplace harassment.

Model of Due Diligence Management

2. Prevention of Human Rights Risks: Equity, Diversity and Inclusion Management System

Compensation and Salary

We are attentive to addressing any inquiries regarding your salary and manage the job structure with a gender-focused approach.



Sexual and Workplace Harassment

We promote a corporate and family culture free from violence and harassment.



Work Environment and Health

We manage a model of equitable promotion where both women and men can grow and develop within the company based on their competencies.



Communication and Professional Development

We encourage the prioritization of your health and ensure a safe working environment.



At Colombina, we embrace **gender equity** through 8 dimensions.



Non-Sexist Communication

We have an inclusive language that eliminates the use of discriminatory stereotypes.



Training and Development

We embrace equity criteria for development, aiming to shape well-rounded individuals with world-class leadership skills.



Work-Life Balance

We promote equal opportunities without gender bias, maintaining objectivity and valuing the competencies and knowledge required for each position.



Recruitment and Selection

We recognize the value of family moments.
Enjoy and cherish them!

Model of Due Diligence Management

2. Prevention of Human Rights Risks: Equity, Diversity and Inclusion Management System

Considering that communication plays a key role in shaping social models and in how we culturally understand and express our gender identity, we seek to broaden and promote the perspective of gender and inclusion in order to stop reproducing discriminatory and sexist attitudes and behaviors.

Therefore, Grupo Colombina has created ***an Inclusive Communication Manual***, designed as a practical reference tool for all employees. Its purpose is to facilitate the integration of gender and inclusion perspectives into organizational communication, ensuring that campaigns, materials, and all forms of communication are free from gender bias, sexist language, and discrimination.



Model of Due Diligence Management

2. Prevention of Human Rights Risks – Human Rights Practices Assessment in Our Value Chain

In order to identify and manage the social and environmental impacts of our value chain, we annually invite our suppliers to participate in the “Measure What Matters” assessment developed by Sistema B. To date, we have evaluated more than 700 suppliers across our value chain in Latin America.

Recognizing the importance of preventing Human Rights risks in our business relationships, we have requested Sistema B to explicitly incorporate this perspective into the assessment. To achieve this, a detailed analysis of the questions within the **B Impact Assessment** was conducted, with the objective of identifying those related to the management of key Human Rights aspects, such as decent working conditions, non-discrimination, occupational health and safety, pay equity, and responsible practices with communities.

In this way, the use of this tool also allows us to measure, monitor, and improve our suppliers’ performance regarding the respect and promotion of Human Rights, while strengthening our due diligence and sustainability actions throughout the supply chain.

Model of Due Diligence Management

2. Prevention of Human Rights Risks – Human Rights Practices Assessment in Our Value Chain

We have an extension of our supplier assessment program aimed at assessing the status of our network of evaluated companies against compliance with Human Rights (HR) standards. For this analysis, all questions included in the B Impact Assessment are reviewed to identify those related to Human Rights. Based on these results, the performance of our network is presented in terms of the percentage of points achieved, compared with the percentage of points achieved by Certified B Corporations in Latin America.

Model of Due Diligence Management

Objective: Strengthen companies' knowledge of business and Human Rights management by providing tools to identify, prevent, and manage potential impacts arising from their activities and business relationships.

Main topics covered:

- Public commitments by companies regarding Human Rights.
- Key principles and elements for business and Human Rights management.
- Due diligence processes to identify, prevent, and mitigate potential impacts.
- Identification of Human Rights risks and impacts.
- Grievance, response, and remediation mechanisms.
- The importance of integrating Human Rights management into the organization's practices and processes.

Course: Recognizing the Cross-Cutting Nature of Human Rights within Your Company.



Model of Due Diligence Management

2. Human Rights Risk Prevention – Assessment of Human Rights Practices in Our Value Chain

Topics Evaluated



Workers

- Financial security
- Health and well-being
- Professional development
- Satisfaction and engagement



Community

- Civic Engagement and Donations
- Supply Chain Management
- Diversity, Equity, and Inclusion



Customers

- Customers management



Governance

- Mission and Commitment
- Ethics and Transparency

2. Human Rights Risk Prevention – Assessment of Human Rights Practices in Our Value Chain

Improvement programs based on the results of the Sistema B assessment

The main learnings achieved in each of the impact areas addressed are as follows:

- **Governance:** Effective stakeholder management was promoted through the implementation of grievance and complaint mechanisms, the strengthening of the code of ethics, and the adoption of strategies to safeguard the company's mission.
- **Workers:** Companies reflected on their non-discrimination policies and explored strategies to improve wages and benefits. In addition, actions were identified to facilitate employees' access to financial services.
- **Clients:** Work was carried out on responsible practices related to data privacy and use, and the importance of ensuring the quality of products and services offered was reinforced.
- **Community:** Policies on diversity, equity, and inclusion were promoted, along with the incorporation of diverse suppliers. Tools were also shared to improve the social and environmental performance of the supply chain and to foster diversity across the value chain.
- **Environment:** Companies assessed their environmental footprint and reviewed best practices related to product certifications and the implementation of environmental management systems.

Additionally, a specialized training on human rights was offered, addressing key concepts such as public commitments, due diligence processes, and remediation mechanisms, thereby strengthening the preventive approach and corporate responsibility.

Model of Due Diligence Management

2. Human Rights Risk Prevention – Assessment of Human Rights for Our Employees

Derechos Humanos



Course Content

- Understand what Human Rights are
- Learn the importance of Human Rights for Colombina
- Define our role as collaborators in relation to Human Rights
- Understand the consequences of failing to comply with or violating them

So far, we have trained more than 6,700 employees.

Model of Due Diligence Management

3. Human Rights Risk Management

Colombina has a risk management model for the entire business group, as well as for all stakeholders linked/associated with its value chain, such as suppliers, contractors, business partners, among others, including vulnerable groups like women and children. The Human Rights Risk Management Policy sets forth the commitments and overall framework for comprehensive management of strategic, operational, and project risks within the company.

Colombina has made significant progress in implementing human rights due diligence and risk management, focusing on the following aspects:

- Periodic analysis of the operational context is conducted along the company's value chain.
- Identified human rights impacts through third parties. While risks have been identified in the company's own operations, there is also an approach to identify risks associated with the value chain based on contribution or linkage.
- Established methodologies for identifying and assessing environmental impacts.
- Conducted analysis of human rights risks and impacts, and defined management measures accordingly.
- Implemented reporting mechanisms as preventive measures, allowing for the identification and establishment of repair or improvement plans if necessary.
- Set up a Committee for Coexistence and another for Equity and Inclusion, as bodies to monitor the management of human rights impacts, including prevention of harassment and promotion of gender equality.
- Developed mechanisms for receiving complaints and grievances that adhere to the principle of accessibility.

Model of Due Diligence Management

3. Human Rights Risk Management

Colombina is making progress in the implementation of due diligence based on the following aspects:

Currently, the company has not presented any human rights violations; however, it has a risk matrix that includes:

- Identification of corporate and operational risks.
- Type of relationship with the risk.
- The right that may be affected due to causation, linkage, or contribution.
- Stakeholder groups involved.
- Severity of the risk.
- Management measures.



Identification of Human Rights Risks

3. Human Rights Risk Management

As part of the diagnosis, an exercise was conducted to update the risk matrix in order to develop management plans for the prevention of these risks.

Direct and indirect risks were identified:

- **Direct risks:** These risks, according to human rights references and standards, are known as "causal risks." They result from the actions of the company.
- **Indirect risks:** These include risks that arise from situations in which the company's actions are one of the contributing factors to the materialization of the risk (risks by contribution). They also encompass risks that arise from the actions of a third party with whom the company has a commercial relationship (risks by linkage).

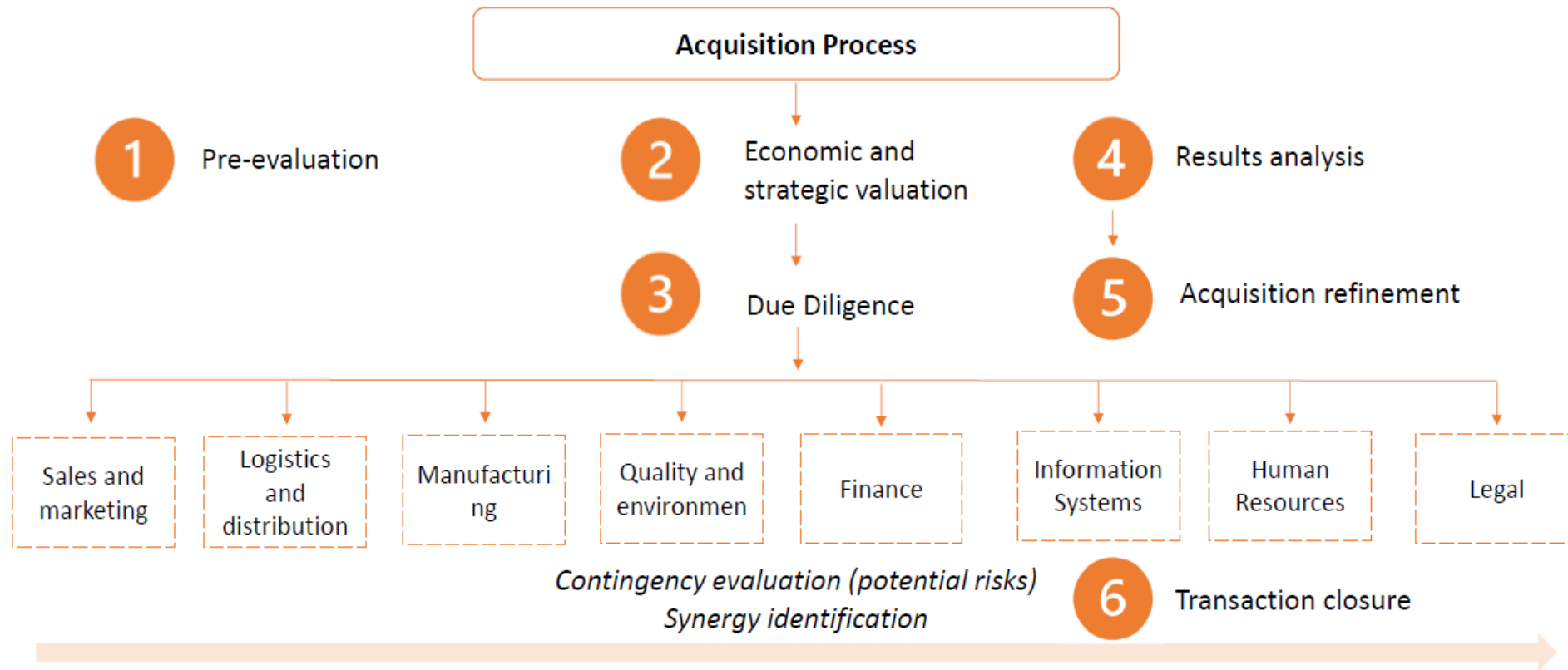
The risk identification followed the following methodological process:

1. Review of industry-specific and geographical references to identify typical risks related to the industry and the areas where Colombina operates.
2. Evaluation of the severity of the risk according to human rights standards (inherent risk).
3. Assessment of the risk based on evidence of current control measures (residual risk).

Identification of Human Rights Risks

3. Human Rights Risk Management

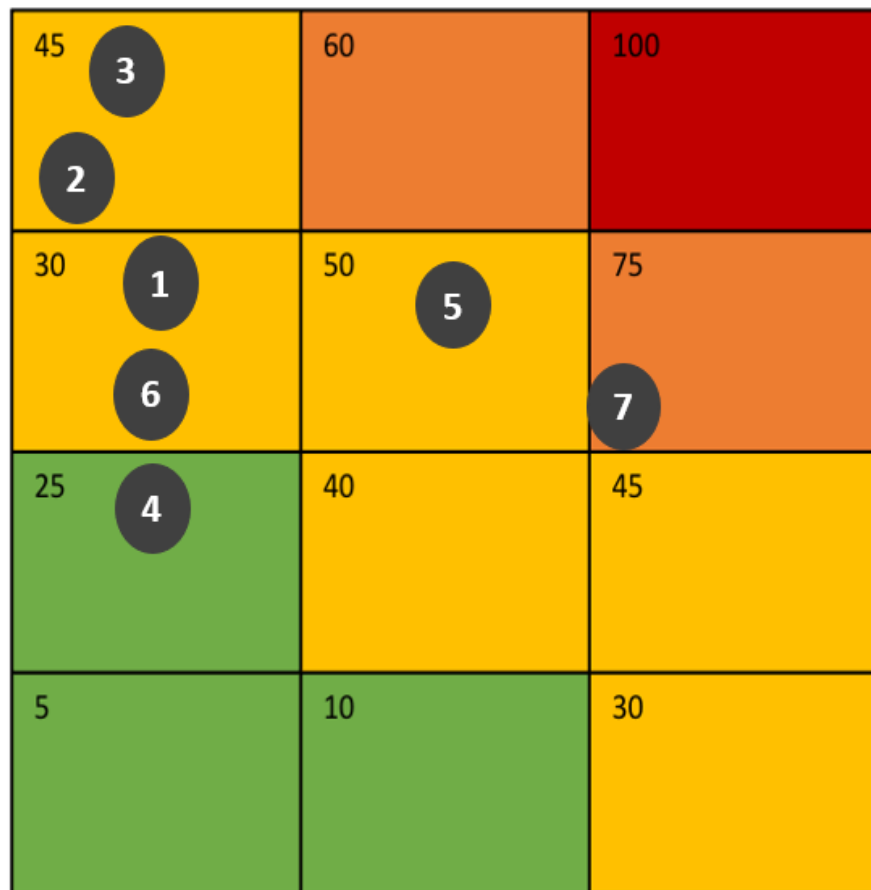
As part of the process of acquiring new companies, businesses, or products, Colombina has a risk assessment matrix within the due diligence framework that is integral to this process. The risk assessment matrix for company acquisitions includes the following criteria:



Identification of Human Rights Risks

Direct Risks

Severity



Probability Occurrence

No.	Type of Relationship	Risk
1	Direct	Risk of Publishing False and Non-Transparent Nutritional Information
2	Direct	Risk of Non-Compliance with Regulations and Standards Regarding Conditions for Use and Maximum Permitted Limits of Additives and/or Other Toxic and Contaminating Products
3	Direct	Risk of Non-Compliance with Quality and Safety Standards and Processes
4	Direct	Risk of Discriminatory Practices Against Women and LGBTIQA+ Individuals
5	Direct	Risk of Discriminatory Practices in Hiring Processes
6	Direct	Risk of Practices and Disincentives Against Union Activity within the Company and its Supply Chain
7	Direct	Risk of Public Threats to Which Company and Supply Chain Workers May Be Exposed

**It is important to highlight that the risks identified in this matrix correspond to the main risks in the beverages and food industry. Therefore, it is crucial for the company to consider them in its risk map and continue developing actions to mitigate their occurrence.*

**This risk map is reviewed periodically to assess progress in management.*

Identification of Human Rights Risks

No.	TYPE OF RISK RELATIONSHIP	IDENTIFIED RISK	POTENTIALLY AFFECTED STAKEHOLDERS	OBSERVATIONS 2024
1	Direct	Risk of Publishing False and Non-Transparent Nutritional Information	Consumers	Controlled risk. The probability is low because, in addition to being a legal compliance matter, Colombina promotes initiatives to ensure the transparency of food information. Colombina goes beyond legal requirements regarding the nutritional information of products. Measures Adopted: Compliance with regulations, information on packaging and the website. It voluntarily provides a nutritional table.
2	Direct	Risk of Non-Compliance with Regulations and Standards Regarding Conditions for Use and Maximum Permitted Limits of Additives and/or Other Toxic and Contaminating Products	Consumers	Controlled risk. In addition to complying with regulations in all its operating countries, Colombina has a health and nutrition strategy aligned with consumer needs, information provided by global scientific entities such as the WHO and Codex, and global regulatory requirements.

Identification of Human Rights Risks

No.	TYPE OF RISK RELATIONSHIP	IDENTIFIED RISK	POTENTIALLY AFFECTED STAKEHOLDERS	OBSERVATIONS 2024
3	Direct	Risk of Non-Compliance with Quality and Safety Standards and Processes	Consumers	Controlled Risk: Over the past two years, no materialization situations have occurred, and the actions established in 2022 have been continued, adding activities to enhance quality and safety. At the corporate level, there has been ongoing strengthening among supply chain stakeholders through the Big Brother program, including agricultural and food ingredient supplier teams. Additionally, the following initiatives have been established: 1. Certification Plan for Food Safety and Quality Management Systems for all Colombina S.A. plants. 2. Development and certification of suppliers in safety management systems. 3. Implementation and development of the Q-100 program. 4. Implementation of LogiQal. 5. Launch of the New DEI Model Strategy.
4	Direct	Risk of Discriminatory Practices Against Women and LGBTIQ+ Individuals	Working women	Controlled Risk: Management measures continue to be implemented. However, high turnover in some positions can cause these efforts to be lost. The culture around gender issues can be affected by high turnover. Nonetheless, Colombina ensures the promotion of equal opportunities from the recruitment stage. Processes for training small human resources groups are developed to provide guidelines regarding selection, recruitment, and employee relations related to gender. Additionally, they have an inclusive communication manual that is internalized by all employees. Complaints and grievances – there have been no complaints in this regard for two years.

Identification of Human Rights Risks

No.	TYPE OF RISK RELATIONSHIP	IDENTIFIED RISK	POTENTIALLY AFFECTED STAKEHOLDERS	OBSERVATIONS 2024
5	Direct	Risk of Discriminatory Practices in Hiring Processes	Employees Young people	Controlled Risk: Current Prevention Measures: They continue working to promote equity not only within the female population group but also considering other socioeconomic conditions, such as ethnicity, disability, and gender. They have guidelines for interview questions and publications to avoid biases in the recruitment process. Internal audits are conducted to verify compliance.
6	Direct	Risk of Practices and Disincentives Against Union Activity within the Company and its Supply Chain	Employees	Controlled Risk: The number of unionized workers has increased (and in locations where there was no union presence before, it now exists. An additional 200 new operational staff compared to 2023). The organization has a positive relationship with the union, which has been in place for 70 years. The vast majority of operational staff in the plants are unionized.
7	Direct	Risk of Public Threats to Which Company and Supply Chain Workers May Be Exposed	Employees	New Risk with Implemented Management Measures

Identification of Human Rights Risks

General Conclusions

- The organization has a positive relationship with the union, which has been in place for 70 years. The vast majority of operational staff in the plants are unionized.
- This matrix identifies the main human rights risks in the beverage and food industry and evaluates them based on the severity of the human rights risk and the likelihood of occurrence at Colombina, according to the company's current measures.
- In the analysis conducted, 94% of the company's own operations were covered, identifying 7 direct risks. There is significant evidence demonstrating effective management of direct risks.
- It was found that the company has not violated any human rights in its own operations or in its value chain. However, a mitigation plan and gap closure have been implemented to address the identified risks.

Mitigation Measures and Gap Closure Plan for Own Operations

Objective: Contribute to the positioning, achievement of strategic goals, and preservation of Colombina's reputation through the adoption of best practices in human rights management in accordance with international standards.

Medium Term	Long Term
Actions aimed at improving the oversight and understanding of the Board and Executive Committee.	Actions aimed at assigning internal roles and responsibilities for human rights due diligence at both strategic and operational levels.
Actions focused on: - Enhancing knowledge about prominent human rights issues. - Perceptions of human rights management by Colombina.	Actions focused on: Continuing to promote an organizational culture of respect and advancement of human rights.
- Prioritizing prominent human rights issues. - Developing protocols for impact resolution and remediation. - Expanding human rights reporting.	Further strengthening the internal human rights due diligence procedure and value chain management.

Governance and Commitment to Human Rights Respect



Disclosure and Awareness of Human Rights Commitment



Human Rights Due Diligence



Mitigation Measures and Gap Closure Plan in the Value Chain

Objective: Strengthen Colombina's management of Human Rights in accordance with international standards.



Strengthening the Responsible Sourcing Model



Disclosure and Awareness of Human Rights Commitment



Due Diligence in Human Rights

Short Term	Medium Term	Long Term
Include Human Rights assurance clauses in high-risk or critical suppliers. Align Colombina's sustainability strategy with supplier management.	- Include clauses to ensure an operational mechanism for complaints and grievances with high-risk or critical suppliers. - Identify social, environmental, and Human Rights risks in the supply chain and segment suppliers.	Evaluate critical suppliers through audits. Develop monitoring and traceability programs with critical suppliers on Human Rights and strategic business areas.
Actions oriented towards: Strengthening the knowledge of employees and suppliers through suitable means.	Actions oriented towards: Measuring the impact of awareness programs.	Actions oriented towards: Promoting an organizational culture of respect and promotion of Human Rights.
- Evaluating current mechanisms in light of PRNU (Principles of Responsibility and Non-Discrimination). - Strengthening the operational mechanism for complaints and grievances.	Updating the Human Rights risk assessment every two years and ensuring the participation of rights holders in upcoming due diligence processes.	

Mitigation Measures within the Organization

At Colombina, we have adopted concrete measures to mitigate human rights risks, particularly aimed at safeguarding employee well-being, preventing discrimination, and ensuring safe working environments. These actions are embedded in our human rights management system and represent a core pillar of our sustainability strategy.

1. Support for employees in production plants

Recognizing that many employees in our production facilities face vulnerable socioeconomic conditions—including a significant number of parents with children under the age of five—we provide free access to childcare services through the Colombina Foundation. This initiative ensures that their children receive comprehensive care in a safe environment while their parents work, thereby reducing risks related to vulnerability, indirect child labor, or lack of family protection.

In addition, we implement parenting schools to strengthen child-rearing and caregiving skills, promoting protective environments at home as well. This measure not only improves the quality of life of our employees and their families but also serves as a human rights risk mitigation strategy within the organization.



Mitigation Measures within the Organization

2. Prevention of Discrimination against LGBTIQ+ Individuals

As part of our equity, diversity, and inclusion system, we implement preventive measures to address risks of discrimination based on sexual orientation or gender identity. Through the Organizational Development area, we conduct training programs and awareness sessions for all employees, with the purpose of fostering a respectful and inclusive organizational culture.

We also have a Human Rights and Non-Discrimination Policy that guides our labor and institutional practices, ensuring that all individuals, without distinction, are treated with dignity and respect.

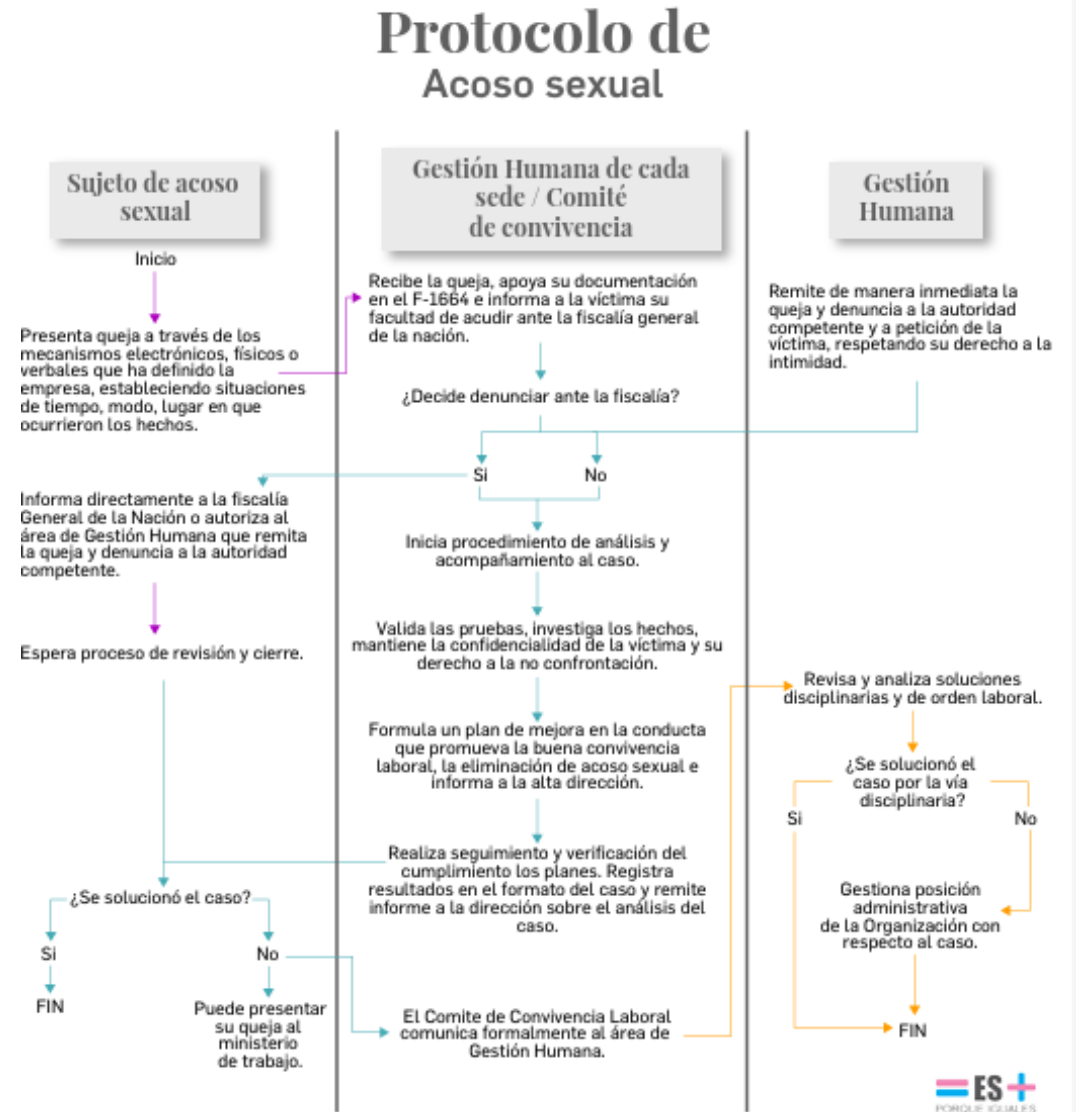
So far, we have trained more than 7.800 employees

Mitigation Measures within the Organization

3. Protocol for the Prevention and Response to Workplace and Sexual Harassment

In line with our commitment to providing a safe and violence-free workplace, we have developed a Workplace and Sexual Harassment Protocol, which includes:

- Internal policy for the prevention of workplace and sexual harassment
- Action flowcharts for addressing harassment cases
- Workplace coexistence manual
- Complaint registry and action plan for reported situations
- Specific manuals and clear procedures to ensure timely and confidential attention
- This tool serves as a measure to mitigate psychosocial risks and safeguard rights within the workplace, ensuring effective channels for the protection of employees.



4. Reporting Mechanisms

Human Rights Attention Protocol

We have a Human Rights Attention Protocol or Guide, which establishes the guidelines and procedures for addressing situations related to these issues within the organization. The protocol consists of the following steps:

1. Definitions and Principles
2. Responsibilities
3. Reporting Procedures
4. Investigation and Follow-up
5. Remediation and Corrective Actions
6. Internal and External Communication
7. Training and Awareness
8. Monitoring and Review
9. List of Policies, Processes, and Associated Formats

In the event of a violation or breach of human rights, the corresponding disciplinary measures will be applied according to the internal work regulations, which are based on current legal standards. These disciplinary measures are classified into serious and minor offenses, and the severity of each offense is assessed to determine the appropriate sanction.

Sanctions may include, but are not limited to:

- **Suspension of the employee for a specified period.**
- **Justified termination of the employment contract. All employees sign this regulation when they sign an employment contract with the company.**
- **Appropriate remediation will be provided, and retaliation or reprisals against individuals who report human rights violations in good faith will be avoided.**

Model of Due Diligence Management

4. Reporting Mechanisms

Colombina is advancing in the implementation of due diligence through the following aspects:

Colombina Ethics Line

One of the tools Colombina uses to identify potential human rights risks is the Ethics Hotline. A Committee is responsible for receiving and following up on each situation reported. The goals of this hotline are:



- Seeks to reinforce ethical behavior in the organization as a fundamental principle for the development of our business.
- Provide individuals with a confidential and reliable tool to help maintain ethics and integrity within our company by reporting human rights issues and transparency practices that affect the organization or its members.
- Contribute to the preservation of the company, its assets, and its continuity.
- Early detection of dishonest acts to reduce their negative effects (e.g., loss of money, corporate reputation, trust).

Communication Channels

- Send sealed envelopes to the Central Office addressed to the Human Resources Vice Presidency, marked as confidential.
- Email: colombinaetica@colombina.com
- Confidential reporting line: (57+2) 8861734

Model of Due Diligence Management

4. Reporting Mechanisms

We have a questionnaire for employees, designed to confirm compliance with the Conflict of Interest and Business Ethics policies established in the Responsible Code of Conduct. This questionnaire is sent to those employees who, due to their hierarchical level or the nature of their functions, are more exposed to significant risks of non-compliance.

95% of the selected employees completed the survey, which was also applied to the members of the Board of Directors.

Reporting on Breaches

Areas	FY 2025
Corruption or Bribery	0
Discrimination or Harassment	21
Customer Privacy Data	0
Conflicts of Interest	0
Money Laundering or Insider Trading	0
Information Security	0

For all the cases of the company, the necessary measures are taken to mitigate the possible risks. In the event of a conflict of interest, employees with supplier companies are removed from supplier-related decisions.

Model of Due Diligence Management

4. Reporting Mechanisms

Occupational Health and Safety Platform

A tool has been created on the corporate intranet for employees to report any incidents or conditions affecting their health and safety at work.

On this platform, employees have access to the Occupational Health and Safety Policy, the corporate Health and Safety Committee, and its functions.

Salud y Seguridad en el Trabajo



Sistemas de Seguridad y Salud en el Trabajo.

Para Colombina son prioridades la protección de la vida, la salud y la seguridad de todos sus colaboradores, contratistas, proveedores y visitantes.

- [+](#) [Nuestro Sistema SG-SST](#) [ir](#)
- [+](#) [Reportar Incidente y/o condición insegura](#) [ir](#)
- [+](#) [Mis reportes](#) [ir](#)

Model of Due Diligence Management

4. Reporting Mechanisms

Coexistence Committee

The objective of this committee is to have a team that contributes to preventing situations of workplace harassment, protecting employees against psychosocial risks that affect health in the workplace, and managing each situation with respect, impartiality, flexibility, tolerance, neutrality, serenity, ethics, and complete confidentiality in information handling.

Members of the Coexistence Committee should possess attitudinal and behavioral competencies such as respect, impartiality, fairness, tolerance, neutrality, serenity, confidentiality, discretion in information handling, and ethics. Additionally, they should have skills in assertive communication, leadership, and conflict resolution.

Por los trabajadores

Principales



Julián Andrés Quintero
Director Planeación Gestión
de Ventas Medios Internacionales
(Oficina Central)

Suplentes



Gloria Nancy Camacho
Coordinadora Supply Chain
(Oficina Central)

Por la empresa

Principales



Miyerlandy Lozada
Directora Administración
Gestión Humana
(Oficina Central)

Suplentes



Nicolás Sierra
Gerente Negocio
Chocolates y Snacks
(Oficina Central)



Jaime Ayalde
Director de
Compensación



Model of Due Diligence Management

4. Reporting Mechanisms

Conflicts of Interest:

We have a questionnaire that is sent to all employees in order to monitor compliance with the conflict of interest and business ethics policies and offer employees a reporting mechanism for cases related to this topic.

This questionnaire is sent annually, and employees are selected who, due to their hierarchical level or functions, are more exposed to significant risks of non-compliance and are considered critical.

In 2025, 95% of employees answered the survey.

Reporting on Breaches

We have a total of 21 reported cases across all areas covered by our Code of Conduct.

For all the cases of the company, the necessary measures are taken to mitigate the possible risks. In the event of a conflict of interest, employees with supplier companies are removed from supplier-related decisions.

Model of Due Diligence Management

4. Reporting Mechanisms Coexistence Committee

The Coexistence Committee has a form in place for employees to report any type of harassment:

Types of Harassment:

- Workplace Abuse
- Verbal Abuse
- Workplace Persecution
- Workplace Discrimination
- Workplace Hindrance
- Lack of Workplace Protection
- Sexual Harassment

COMITÉ DE CONVIVENCIA LABORAL REGISTRO DE QUEJA	
FECHA	
EMPRESA (EMPLEADOR)	
SEDE	
NOMBRE EMPLEADO(A) (que interpone denuncia)	
CARGO EMPLEADO(A) (que interpone denuncia)	
TIPO DE ACOSO QUE DENUNCIA	
NOMBRE DEL SUPUESTO INVOLUCRADO	
CARGO SUPUESTO INVOLUCRADO	
DETALLE DE LA QUEJA	
REVISIÓN COMITÉ	
PLAN DE ACCIÓN	
ACCIÓN DE CIERRE	
FECHA DE CIERRE	

F-1664/11-2019

La compañía le informa que su queja o denuncia se gestionará bajo un ámbito de respeto, imparcialidad, flexibilidad, tolerancia, neutralidad, serenidad, ética y total confidencialidad en el manejo de información y que las instancias definidas para atenderla buscarán con el mayor de los juicios y objetividad el cierre de la misma.

Model of Due Diligence Management

4. Reporting Mechanisms Coexistence Committee

It is part of Colombina's communication plan to raise awareness about the types of harassment, as well as to provide accountability on the management of the Workplace Harassment Committee



Model of Due Diligence Management

Corporate Equity and Inclusion Committee



**Jose Manuel
Echeverri**

Human Resources Vice President
Executive Management**



**Miyerlandy
Lozada Guerrero**

Human Resources Administrative
Director*



**Isabella
Henao Vallejo**

Communications director



**Andrea
Linares Rodríguez**

Director of Training and
Development



**Luis Miguel
Hurtado**

Director of Human Resources -
Confectionery La Paila Plant



**Jaime Eduardo
Ayalde Navia**

Director of Compensation and
Benefits

*Gender and Inclusion Equity Committee Coordinator

** Senior Management Representative

Satellite Equity and Inclusion Committee



Yolanda Torres
Directora de Gestión Humana
Planta Colcauca



Liliana Gómez
Jefa de Gestión Humana
Planta Conservas



Luis Miguel Hurtado
Director Gestión Humana
Planta La Paila



Diana Rivera
Jefa de Comunicaciones
Belmonte



Dagoberto Lasso
Presidente de la Subdirectiva
de Colcauca del Sindicato
Nacional de Trabajadores
Sintracolombina



Eliceo Castro
Presidente de la Subdirectiva
de Conservas del Sindicato
Nacional de trabajadores
Sintracolombina



Ana María Portocarrero
Comisión Reclamos del Sindicato
Nacional de Trabajadores
Sintracolombina

Model of Due Diligence Management

Accountability

- Annually, the company releases its Sustainability Report, which outlines the efforts undertaken in Human Rights and its 6 sustainable management priorities. To date, 15 reports have been published.
- We carry out the COP - Communication on Progress for the United Nations Global Compact.
- We have a sustainability website: <https://colombina.com/global/sustainability-management>, where you can find the company's sustainability management efforts.
- The information reported in the sustainability report and on the website is governed by the 10 Principles of the Global Compact, the international reporting guidelines (GRI), S&P Global's Corporate Sustainability Assessment (CSA), and additional standards such as SASB and TCFD.



2025
Sustainability
Report Grupo Colombina