



SUPPLIER CODE OF CONDUCT

GRUPO EMPRESARIAL COLOMBINA

For Colombina, sustainability is a strategic pillar that aims to generate long-term value for all stakeholders. We are convinced that as businesses are managed through transparent, ethical, and responsible practices, it is possible to drive the growth of our country. We believe that an important part of our commitment to sustainable development is the active involvement of our partners to continue fulfilling our goal of developing the business fabric and generating social, economic, and environmental value.

In this context, we have created this code of conduct for suppliers of goods and services for all the companies that are part of the Colombina Business Group, which outlines the minimum responsibilities they must meet. The selection and negotiation of corporate suppliers must be carried out in accordance with the guidelines established in this responsible code of conduct. We will always establish commercial relationships with legally constituted companies and/or individuals operating within the framework of legality.

We will contract suppliers of goods and services that offer optimal levels of price, quality, and timeliness, which generate a competitive advantage for the business group. Additionally, we will maintain a constant search for sourcing alternatives within a global, innovative context, with a permanent commitment to ethics, sustainability, and food security.

1. Relationship with Suppliers, Contractors, Third Parties, and Government Entities

At Colombina, we work with suppliers who share our corporate values and contribute to our sustainability management throughout the entire value chain. We start from the principle of mutual trust and respect, creating long-term relationships and promoting compliance with the fundamental principles of the Global Compact in Human Rights, Labor Standards, Environment, Anti-Corruption, and Business Ethics.

These principles will be promoted and validated throughout the supply chain through the following guidelines:

Human and Labor Rights:

Suppliers will defend fundamental human rights within their value chain and promote the non-violation of these rights. They must comply with the following obligations:

- **Prohibition of Forced Labor:** Prohibit any form of forced labor as well as physical abuse of employees.
- **Working Hours and Remuneration:** Fully comply with relevant legislation regarding wages, working hours, and benefits, and provide employees with opportunities to develop their skills and capabilities.

- **Health and Safety at Work:** Provide a safe and healthy workplace, reducing the risk of accidents, injuries, and any other types of health hazards.
- **Elimination of Discrimination and Harassment:** Maintain workplaces free of discrimination. The only basis for hiring, promoting, or training someone should be performance, skills, and experience.
- **Freedom of Association and Collective Bargaining:** Respect the rights of employees to form or join a union without any fear.
- **Communication:** Colombina will promote within the supply chain the replicability of the supplier policy and the practices associated with their programs, so that they can extend it to their own supply chain.
- **Supplier Development:** We will strive for the comprehensive development of our suppliers, so they meet quality and competitiveness standards. For this purpose, programs like Big Brother and Supplier Certification have been implemented.
- **Extended Sustainability:** We support our suppliers in their commitment to sustainability and encourage them to extend this commitment to their own supply network.

Environment

Environmental Care: Colombina will promote within the supply chain that suppliers adopt practices enabling them to comply with current environmental laws and regulations, and to promote the efficient use of natural resources and the pursuit of continuous improvement for global environmental sustainability. Colombina will encourage suppliers to adopt sustainable environmental practices, comply with current laws and regulations, and work on strategies addressing the following aspects:

Climate Change: Focused on the measurement and management of Greenhouse Gases (GHG).

Energy Efficiency: Develop practices that promote energy efficiency, contributing to the achievement of the Sustainable Development Goals. This includes tracking indicators such as the carbon footprint and implementing energy efficiency alternatives.

Pollution Prevention through Efficient Waste Management: Manage solid waste efficiently by employing strategies of reduction, reuse, and recycling, following the circular economy model.

Biodiversity: Encourage suppliers to engage in practices that promote biodiversity conservation, no deforestation, and land conservation. This reinforces the commitment to the preservation and balance of ecosystems, which is vital for the planet's sustainability.



Colombina has a series of corporate policies to ensure the fulfillment of these commitments and extends this responsibility throughout its entire value chain.

<https://colombina.com/gl-en/sustainability/value-chain>

Business Ethics - Ethics Policy (Responsible Code of Conduct Chapter 5)

The Business Group explicitly states its unwavering commitment to strictly comply with the legal norms regulating activities related to its business operations, thereby conducting them in an ethical, transparent, and honest manner.

All employees are obligated to comply with the laws, provisions, and regulations issued by the authorities, as well as the policies and procedures established by the Business Group.

It is the policy of the Business Group to fully cooperate with all authorities. In particular, all employees must observe transparency and ethical principles in their relationships with clients, contractors, and investors, market knowledge, reporting of suspicious operations, document retention, and timely response to authorities' requirements as outlined in the regulations on bribery, prevention, and control of money laundering, issued by the Superintendency of Companies and Finance, the DIAN, and other competent bodies.

- **Commercial Integrity:** Operate with integrity, respecting relevant laws and avoiding bribery and fraudulent practices, complying with tax requirements, anti-money laundering legislation, and promoting and respecting intellectual property.
- **Relationships with Third Parties:** No transactions will be conducted with legal or natural persons involved in illicit businesses, those with pending legal issues, or those suspected of involvement in illicit activities. Business Group resources will not be used to pay, directly or indirectly, representatives of public, private, or mixed entities to secure business or special favors. No employee may offer bribes, payments, or gifts to third parties, regardless of intent to influence.

In the exercise of their duties, employees must treat third parties fairly, loyally, and equally.

- **Anti-Competitiveness:** Suppliers must ensure, preserve, and promote the proper functioning, transparency, and existence of fair and equitable competition in all markets and productive sectors, benefiting socio-commercial relationships.
- **Anti-Corruption and Conflict of Interest:** Suppliers must strengthen integrity, transparency, and trust through the implementation of anti-corruption policies and conflict of interest management.

Zero Tolerance for Fraud

This means that any individual committing fraud against any of the companies in the Business Group will be criminally prosecuted.



Any employee involved in fraud against the Business Group will be dismissed with just cause, without severance pay. A simple reprimand is not acceptable.

In cases of fraud, disciplinary decisions such as temporary or permanent separation from the position will no longer be the responsibility of the VP to which the employee belongs but will be transferred to the VP of Human Resources.

Prevention of Corruption, Money Laundering, and Bribery Risks

The Business Group will refrain from conducting operations with third parties whose resources originate from illegal activities. To this end, due diligence procedures will be adopted to understand their counterparts, following, where applicable, the established regulations on the prevention, control, and management of the risk of money laundering, terrorist financing, and bribery.

To achieve this, it is recommended that the companies within the Business Group carry out at least the following activities:

a. Declaration: Request third parties with whom the Business Group maintains business relationships to sign a declaration indicating that:

- They are not subject to sanctions for corruption, money laundering, national or transnational bribery, or other willful crimes.
- Their resources and those committed in the corresponding legal relationship come from lawful activities.
- They have not engaged in transactions or operations aimed at or consistent with the execution of illegal activities, nor will they contract or have ties with third parties engaged in or having engaged in activities outside the law.
- The resources committed in the respective contract or legal relationship do not originate from any illegal activity.
- They comply with applicable regulations regarding the prevention of corruption, money laundering, and terrorist financing.

b. Due Diligence: Perform the necessary due diligence to fully identify third parties and verify information in publicly available databases or lists, especially the binding lists for Colombia (UN Security Council List) and OFAC lists.

c. Early Termination: If the Business Group verifies that the declarations made by third parties under this chapter are false or inaccurate, they will seek to terminate the corresponding commercial relationship to the extent legally possible. It is recommended to include clauses in contracts or agreements that allow for the immediate and early termination of any legal relationship for this reason, without generating the recognition and payment of damages. This is subject to the acceptance of the stipulation by the counterparty in the contract or agreement.



Receipt or Giving of Gifts from Third Parties

The Business Group maintains a relationship of mutual respect with its suppliers and contractors, seeking continuous and stable supply in terms of quality and timeliness, within a balance in negotiations. The following guidelines must be considered by employees regarding their relationship with suppliers:

- Employees are prohibited from asking for or receiving from suppliers or contractors, for themselves, family members, or third parties, any type of gratuities, commissions, gifts, invitations, favors, loans, or perks.
- Employees are prohibited from obtaining for themselves, their families, or third parties any benefits derived from this commercial relationship, including gifts or invitations that compromise their independence.
- Employees are prohibited from giving, offering, or promising a national or foreign public servant, suppliers, and/or contractors directly or indirectly sums of money, any object of pecuniary value, or any other benefit or advantage in exchange for the public servant, suppliers, and/or contractors performing, omitting, or delaying any act related to the exercise of their functions in relation to a national and/or international business or transaction.

Exceptions:

a) Symbolic value gifts, with a maximum equivalent of US\$30, such as calendars, agendas, promotional pens, etc.

b) Invitations and favors that do not exceed reasonable amounts, with prior approval from the respective VP.

c) Discounts and special rates offered to all employees, such as corporate rates for hotels, airlines, and car rental companies.

- The Corporate Supply and Foreign Trade Areas will inform suppliers of goods and services, including contractors, financial entities, consultants, and advisors of any kind, of this prohibition.
- If, despite the above, a gift is received that does not comply with these guidelines, it will be handed over to Human Resources, which will allocate it for an internal activity or for charity purposes.
- Commercial, technical information, and specifications provided or received from suppliers or contractors must be used exclusively in business and cannot be provided to third parties.



Contractor Remunerations

Employees should not engage with third parties if they have reasons to suspect that they will pay bribes on behalf of the Business Group.

Employees must ensure that no contractor will make, offer, solicit, or receive inappropriate payments on behalf of the Business Group. All fees and expenses paid to contractors must represent appropriate and justifiable remuneration for legitimate services to be provided and must be paid directly to them. Accurate financial records of all payments must be maintained.

The companies within the Business Group must adopt appropriate procedures to ensure that their contracts or agreements with contractors do not expose them to liability under any applicable anti-corruption law. These procedures should help employees determine if contractors represent a corruption risk and, if so, what steps should be taken to address those risks. This may include, in particular, cases where the contractor is hired to act on behalf of any of the Business Group companies to:

- Solicit new business.
- Interact with public officials.
- Engage in other high-risk situations.

Please find the “Sustainable Supply Approach Annex” below

To whom it may concern

Grupo Empresarial Colombina

On behalf of the company _____, I confirm that I have read and shared with individuals related to companies within the Colombina Business Group the following information: SUPPLIER POLICY AND ETHICS POLICY, both documents contained in COLOMBINA'S RESPONSIBLE CONDUCT CODE.

For the record, I sign in the city of _____ on the _____ day of _____ 20____.

Signature: _____

Name: _____

ID Number: _____

(Kindly fill out this form and return it scanned)



Annex Supplier Code of Conduct Chapter Sustainable Supply Chain Approach

Aligned with Colombina Group's sustainability goals, we develop capabilities in our suppliers following the Sustainable Strategic Sourcing Model, fostering transparent, trustworthy, and mutually beneficial relationships with all stakeholders. We integrate social, environmental, and corporate governance factors into the supplier selection and negotiation process.

We recognize that companies must meet the expectations of various stakeholders and understand the social, environmental, and ethical practices of suppliers. Therefore, the company collaborates closely with strategic partners in development programs, measurement, training, and support, aiming for sustainable procurement in the purchasing process and effectively managing associated risks to establish long-term relationships with suppliers.

Colombina prefers to work with suppliers who manage their social, environmental, and corporate governance factors. We continually assess our value chain to strengthen governance, community, worker, environmental, and customer impact areas.

To enhance our suppliers' capabilities, we operate a program called "Measure What Matters + Colombina," employing a measurement tool known as the B Impact Assessment.

Impact Areas Measured in This Scheme:

- **Governance:** Mission, commitment, and governance bodies. Ethics, policies, and transparency. Income and accounting.
- **Workers:** Financial security (compensation), health, safety, and well-being, professional development, satisfaction, and commitment.
- **Community:** Diversity, Equity, and Inclusion. Local impact, civic engagement, and donations. Supply chain/Procurement.
- **Environment:** Environmental management. Air and climate, water, land biodiversity, and waste.
- **Customers:** Customer relations, Impact of products or services.

The "Measure What Matters + Colombina" Program has the following stages:

1. **Raise Awareness:** This is the initial approach made with the group of suppliers to be evaluated, aiming to highlight the importance of triple impact, introduce the B Impact Assessment tool, explain how to work with it, and enroll companies to start managing self-assessment.



2. **Evaluate:** The social and environmental performance, risks, and improvement opportunities are measured through the B Impact Assessment, with continuous support from the System B Colombia Programs team. Office Hour sessions are held to address doubts and concerns.
3. **Compare and Improve:** Suppliers who complete the assessment gather to review their results, identify weaknesses requiring improvement plans, and receive useful materials to deepen best practices and business model impact.
4. **Support and Train:** Suppliers receive overall results and results for each impact area. Colombina stipulates that suppliers scoring below 50 points overall or below 40% in any impact area must receive support or training to strengthen their social and environmental practices.

We have 2 modalities to strengthen suppliers according to the result:

Support Modality: Small groups of up to 8 companies receive personalized support.

Workshop Modality: Larger workshops focus on areas needing improvement based on partial and overall results.

5. **Re-evaluate:** This stage involves a second review by companies of their initial results. They update fiscal year data, revise previous responses, and document implemented or strengthened practices. This process leads to a new assessment, reducing improvement opportunities.

Most companies opting for re-evaluation initially scored below 50 points and received support or training from Colombina. Also, companies needing to specifically strengthen a particular impact area and participating in workshops or support sessions with Colombina undergo re-evaluation.

If a supplier is re-evaluated after receiving guidance and training from Colombina and, following a one-year period to implement its improvement plans, again obtains a score below 50 points, the supplier will be promptly notified that negotiations with the company will be temporarily suspended. This measure will remain in place while the supplier defines and implements an improvement plan aimed at achieving a score above 50 points, in order to strengthen its performance and continue building a sustainable long-term relationship.

- Finally, it's important to note that within the procurement process for national suppliers of goods, services, promotional materials, and spare parts, social and environmental compliance validation occurs. When choosing between two suppliers with identical service conditions (quality, payment terms, price) for the same raw material, their



Social Responsibility evaluation results serve as a parameter for procurement decision-making.

- When a sourcing event or request for proposal is awarded, the winning supplier is required to carry out the social and environmental assessment using the methodology established by Colombina, as a prerequisite to continue with the purchasing process. This requirement applies to suppliers that do not yet have a result obtained through Sistema B, Smeta Sedex, Ecovadis, or another assessment tool they use internally.