

Official Translation code: ALIAR-DOC005 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.

CODE OF CONDUCT FOR SUPPLIERS AND CONTRACTORS

CUM-DC-005

ISSUE: 01

ISSUE DATE: 11/16/2022

PREPARED BY:

Jeisson Mauricio Garcia Gallo, Compliance officer

Yeimy Castiblanco Giraldo, Head of Internal Control

REVIEWED BY:

Sustainable Suppliers Committee

APPROVED BY:

Felix Alexander Ramirez Ortiz, Legal Manager


Silvia A. Puentes D.
TRADUCTOR E INTERPRETE OFICIAL - INGLES
Resolución No. 0941 - 30/07/96 Ministerio

INDEX

1. OBJECTIVE

2. SCOPE

3. REFERENCE DOCUMENTS

4. SELECTION OF SUPPLIERS

5. SUPPLIERS CONDUCT POLICIES

6. MODALITIES AND ACTIONS THAT AGAINST ETHICS AND
TRANSPARENCY

6.1. Interest conflict

6.2. Bribery

6.3. Fraud

6.4. Corruption

6.5. Favoring third parties

6.6. Influence peddling

6.7. Unfair administration

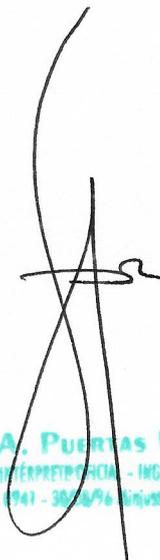
6.8. Impact on free competition

6.9. Impact on Human Rights

7. REPORT OF UNETHICAL CONDUCT

7.1. Communication channels:

7.2. Reporting commitment



Silvio A. Puertas P.
TRADUCTOR E INTERPRETE PUBLICO - INGLES
Resolución No. 1941 - 30/08/96 Justicia

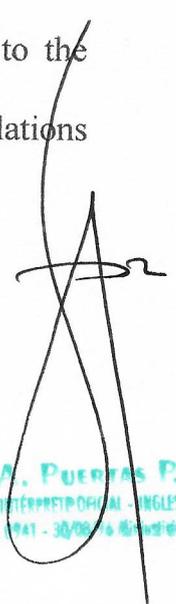
1. OBJECTIVE

The Code of Conduct for suppliers and contractors of Agropecuaria Aliar S.A. establishes the guidelines that rule the transactions and businesses carried out by the company, always promoting ethical, transparent and honest behavior. Ethical conduct is an essential part of Aliar's organizational culture and is framed in the principles of honesty, legality, transparency, loyalty, gender equality, no child labor, integrity, trust and compliance.

The Code of Conduct is a statement of the commitment of our suppliers and contractors to act ethically and transparently in all transactions and commercial relationships that are generated, taking into account the slogan of zero tolerance for acts of corruption, bribery, fraud or anything that threatens against norms, laws and ethics.

2. SCOPE

This Code of Conduct applies to all suppliers and contractors and refers to the minimum responsibilities that they must comply with during commercial relations with our Company.



Silvio A. PUERTAS P.
TRADUCTOR E INTERPRETE OFICIAL - INGLÉS
Resolución No. 1741 - 30/09/76 Ministerio

In order to formalize a commercial relationship, we invite suppliers to respect and abide by what is stated herein and in the others that may be applicable, and our company can verify compliance at any time.

3. REFERENCE DOCUMENTS

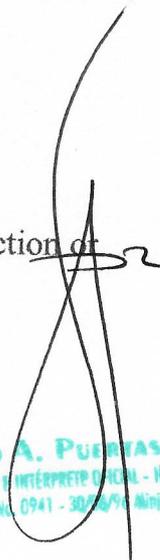
- Anti-corruption Law 1778 of 2016
- Transparency Law 2195 of 2022
- Compliance of the transparency and business ethics program manual (CUM-MA-002).
- Agropecuaria Aliar S.A. code of ethics (CUM-DC-001)
- SAGRILAF Manual (CUM-MA-001)

4. SELECTION OF SUPPLIERS

Our suppliers will be selected through strict due diligence procedures that seek to know, evaluate and link duly constituted suppliers in compliance with current legal regulations and the corporate requirements of Agropecuaria Aliar S.A. within the framework of its principles, policies and sustainability parameters.

5. SUPPLIERS' CONDUCT POLICIES

- Agropecuaria Aliar S.A. will not participate in any form of business, transaction or commercial agreement, related to bribery, corruption or fraud.


Silvio A. Puentes P.
TRADUCTOR E INTERPRETE JURADO - INGLES
Resolución No. 0941 - 30/06/94 Minjusticia

- Agropecuaria Aliar S.A. collaborators will not receive expensive¹ gifts or presents from a supplier or contractor, intended to influence or coerce a decision or a business relationship.
- Aliar S.A. collaborators are prohibited from accepting or requesting trips or expensive gifts to a supplier or contractor, potential supplier or contractor.
- All relationships with suppliers and contractors, national or foreign, must strictly comply with applicable legislation and defined internal procedures.
- All transactions with foreign suppliers or contractors must be strictly framed in the Import Procedure (CAD-PR-012) defined by the company.
- No collaborator of Agropecuaria Aliar S.A. 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.

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.)

- No collaborator of Agropecuaria Aliar S.A. will accept perks to obtain preferential treatment or to evade the control procedures established by the Company.
- All relationships with suppliers or contractors will be framed in full compliance with applicable laws, rules and regulations.
- In the event that any of our suppliers and/or contractors provokes, causes or commits any unethical conduct or actions against the guidelines provided for in the internal policies of Agropecuaria Aliar S.A., the Company will be authorized to suspend contracts or links with this supplier and/or contractor, discard it from the selection processes in which it is participating, and not to carry out future business or transactions with it.

6. MODALITIES AND ACTIONS THAT ATTACK AGAINST ETHICS AND TRANSPARENCY

6.1. Conflict of interest

This modality occurs when a collaborator has a personal interest that can affect his or her judgment and arbitrarily infer about a decision, negotiation or any type of procedure. If presented, the supplier or contractor and the collaborator must ensure that this condition is known to Aliar S.A.

A conflict of interest is constituted under the following situations:

- That the supplier or contractor, or their legal representative, has family relationships in the first and second degree of consanguinity (parents, children, siblings, grandparents, grandchildren) with any employee of Agropecuaria Aliar S.A. who:

- Within their functions, is a contract approver, manager or supervisor.

- Belongs to the purchasing, treasury, legal or accounting areas.

- That the supplier or contractor participates in boards, control bodies and/or administration of companies linked to the company.

- That the supplier or contractor, or their legal representative has first-degree romantic relationships (spouse, in-laws, spouses of their children, spouse of mother) with any employee of Agropecuaria Aliar S.A. who:

- Within their functions is a contract approver, manager or supervisor.

- Belongs to the purchasing, treasury, legal or accounting areas.

If it is not possible to foresee a conflict of interest, not declaring it will not be considered a violation of this code. As soon as its existence is noticed, the situation must be reported during the linking or updating of data for its respective management.

Silvio A. Puentes P.
TRADUCTOR - INTERPRETE JURISDICCIONAL - INGLES
Inscripción No. 0941 - 30/08/99 Ministerio

A conflict of interest under the terms of this document is not in itself a breach of ethics; information thereon is required to establish the relevant strategies for each case.

6.2. Bribery

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

- Offering gifts, money, trips or favors to a third party with the purpose of receiving some benefit in favor of a business, tender, procedure or special treatment.
- Receiving gifts, money, trips, or favors from a third party with the purpose of granting benefits, contracts without due process or evading controls or procedures.
- Giving presents, money, trips, favors or anything similar with the purpose of evading any control or receiving a special treatment outside of the applicable procedures or standards by a public or private supplier or contractor.

6.3. Fraud

Any action that goes against truth and righteousness, intended to harm someone or the Company. 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 another person. Among the situations that may represent fraud on the part of suppliers and/or contractors are:

- Malicious omission of procedures and controls.
- Malicious concealment of information.
- Malicious distortion or alteration of related information.
- 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 company resources or a third party related to the company.

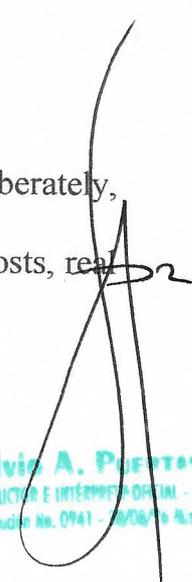
If you become aware of a fraud alert, you must immediately inform the Compliance Officer or report through the available channels described herein.

6.4. Corruption.

Any action aimed at a particular benefit or interest, in detriment of the Company's own resources or the public administration.

6.5. Favoring third parties

To help during the different contracting or linking processes deliberately, representing benefits, among others, to suppliers and contractors, altering costs, real


Silvia A. Puertas P.
TRADUCTOR E INTERPRETE OFICIAL - INGLIS
Resolución No. 0941 - 2008/06 del Poder Judicial

needs or ignoring technical requirements and studies to obtain a personal benefit, generally economic, affecting the Company's resources.

6.6. Influence peddling

To use your position or hierarchical position improperly to alter decision-making in any Company operation, whether pre-contractual, contractual, administrative, commercial or institutional, seeking your own benefit or that of a third party.

6.7. Unfair administration

To use the functions of administration of the company's assets, for one's own benefit or that of a third party, with abuse of the functions of the position, using such position to contract obligations or develop fraudulent activities or activities aimed at squandering or misusing, generating economic damage to the company's assets.

6.8. Impact on free competition

To originate acts of unfair competition or restrictive practices of free competition, with companies in the market by virtue of position or hierarchical level, and that these acts oblige the Company against carrying out conduct that threatens free competition.

6.9. Impact on Human Rights

It includes any action that is interpreted as suppression or violation of human rights. If any violation or action that violates human rights is identified in the creation process, the third party will not be linked to our company. If it is identified during the commercial or contractual relationship, the corresponding investigation will proceed in order to establish the actions to be taken regarding the relationship with the third party.

7. REPORT OF UNETHICAL CONDUCT

Any situation identified by a supplier, contractor or collaborator of Aliar S.A. that goes against ethics and the provisions of this Code may be reported at any time by any of the established means.

7.1. Communication channels:

- Email: eticaytransparencia@aliar.com.co
- Ethics and transparency mailboxes installed inside the company
- Communication with the Compliance Officer, to cell phone 3223213549.

7.2. Reporting commitment

Suppliers and contractors agree to use these communication channels to report any unethical conduct that they identify that goes against ethics, the law, company policies or this Code.

8. CONTROL OF CHANGES

DATE: 11/16/2022

ISSUE: 01

ISSUE DESCRIPTION: issue of the document

Translator: SILVIO ALEJANDRO PUERTAS PINO

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

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