



TRANSPARENCY AND CORPORATE ETHICS PROGRAM

PTEE



Compliance Management



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TRANSPARENCY AND CORPORATE ETHICS PROGRAM

1. GENERAL.

1.1. Introduction to the Transparency and Business Ethics Program (PTEE)

At Don Maíz, relations with employees, suppliers, customers and other stakeholders are based on the premise that mutual actions must be distinguished by trust and transparency. These fundamental premises of conduct are established and conceptually consolidated in this Transparency and Business Ethics Program, which includes the corporate values and principles, based on which Don Maíz intends to guarantee that it has high ethical and self-regulation standards.

The Transparency and Corporate Ethics Program (hereinafter referred to as "PTEE") is aimed at gathering the best business practices, in order to ensure that our values and ethical principles always prevail in all behaviors of our employees and other stakeholders. For these purposes, this PTEE is addressed to all counterparts such as workers and internal collaborators, suppliers, customers and other stakeholders linked to the company. In full compliance with all the provisions set forth in Laws 1474 of 2011 and 1778 of 2016, External Circular 100-000011 of 2021 issued by the Superintendencia de Sociedades(entity in charge of regulating and supervising the activities of companies in Colombia), Law 2195 of 2022, Decree 1736 of 2020 and the regulations that modify or complement them, as well as in all international conventions signed by Colombia, including the Inter-American Convention against Corruption of the Organization of American States of 1997, the United Nations Convention against Corruption - UNCAC- of 2005, and the Organization for Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 2012 (hereinafter the "Anti-Corruption Provisions").

1.2. Scope:

The PTEE applies to all employees, senior management, shareholders, suppliers, distributors and customers of the organization, including temporary or direct contract personnel, who must ensure that they do not engage in any form of bribery, transnational bribery, fraud or any other conduct that does not allow business to be conducted in an ethical, transparent and honest manner.

1.3. Regulations

1.3.1. International norms and standards

As part of Colombia's significant efforts to combat corruption, an international legal framework has been adopted, including the following conventions and agreements:

- ✓ The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.
- ✓ The Inter-American Convention against Corruption of the Organization of American States- OAS;



✓ The United Nations Convention against Corruption (UNCAC).

Some of the above instruments expressly promote the adoption of compliance programs and codes of conduct by companies.

Thus, for example, the OECD recommendation to combat foreign bribery, adopted in 2009, urges member countries to encourage companies to develop and adopt adequate internal controls, ethics and compliance programs or measures to prevent and detect bribery of foreign public officials.

1.3.2. National standards.

a. Article 23 of Law 1778 of 2016, establishes the duty of the Superintendencia de Sociedades to promote in the companies subject to its oversight, the adoption of transparency and corporate ethics programs, internal anti-corruption mechanisms, internal audit mechanisms and standards, promotion of transparency and mechanisms for the prevention of Transnational Bribery conducts.

b. Article 86, paragraph 3 of Law 222 of 1995 states that the Superintendency of Corporations is empowered to impose sanctions or fines, successive or otherwise, up to two hundred (200) SMMLV, on those who fail to comply with its orders, the law or the bylaws.

c. Article 7, paragraph 28 of Decree 1736 of 2020, it is the responsibility of the Superintendencia de Sociedades to "instruct, in the manner it determines, entities subject to its supervision on the measures they must adopt to promote transparency and business ethics in their business practices in order to have internal mechanisms to prevent acts of corruption (...)", so as to have more companies, more employment, and competitive, productive and sustainable companies.

d. Circular 100-00011 09-Aug-2021 Superintendence of Corporations.

e. Administrative Liability Regime for Legal Entities - Law 2195 of 2022 - Transparency, prevention and fight against corruption.

f. Law 2155 of 2021 Article 631-5. Definition of Beneficial Owner.

1.3.3. Design and Approval.

The Company designed and approved the PTEE by adopting the following specific actions:

- The PTEE is approved by the minutes of the company's highest corporate body.
- For the design of the PTEE, we proceeded to identify the risks of Transnational Bribery to which the Company is exposed considering its size, industry or economic sector, geographic areas, third party intermediaries, among others.



- The PTEE was structured in such a way as to identify, detect, prevent and mitigate the risks of Transnational Bribery, creating adequate procedures and controls and assigning specific functions to the Company's internal collaborators.
- By means of this act of the highest corporate body, it was established that the PTEE and the guidelines contained therein shall be of mandatory application and compliance by the Company, its internal employees and other stakeholders.

2. CONTRACTING AGENTS AND INTERMEDIARIES

2.1. Hiring of Agents and Intermediaries

The hiring of agents and intermediaries poses corruption risks as they may act on behalf of the Company.

Therefore, we seek to minimize the Company's vulnerability by identifying the third parties that should be regulated by anti-corruption procedures, the steps to follow when appointing such third parties and the guidelines for detecting warning signs.

Thus, the Company will use due diligence systems when selecting potential suppliers and intermediary agents. To this end, a review of legal, financial, accounting, market reputation and third party relationships will be carried out to ensure impartiality and efficiency when contracting them.

Examples of third party Intermediaries may include: sales and marketing agents and service providers; facilitators, business opportunity identifiers and brokers; third party political lobbyists; port and customs agents; lawyers, tax advisors and other professionals.

The policy identifies three broad categories of third parties with a higher risk of corruption. Procedures are adopted to mitigate the risk of corruption associated with intermediaries hired to: Soliciting new business and interacting with public officials and high-risk situations.

A categorization of third parties can be made based on the following considerations: The nature of the third party, the type of services to be provided, the jurisdictional risk, and the value or time of the engagement.

2.2. Steps to follow when contracting with Third Parties:

- Employees should exercise care and skill in selecting and negotiating with third parties, and be aware of flagging any concerns related to corruption risks.
- Employees should not hire an agent, consultant or other intermediary if they have any reason to suspect that he or she will pay bribes on behalf of the Company.



- Employees must also ensure that contracted third parties do not make, offer, solicit or receive improper payments on behalf of the Company.
- All fees and expenses paid to third parties should represent appropriate and justifiable remuneration for legitimate services to be rendered and should be paid directly to the third party (the latter element may require the assessment of significant financial controls). The Company may also request documentation on the reasonableness of fees deemed appropriate/justifiable or do so in higher risk cases.
- Accurate financial records of all payments must be retained.

In cases identified as having a higher risk of corruption, performing the following steps can minimize the risk:

- **Due diligence:** Conduct due diligence to verify the reputation and integrity of the Third Party.
- **Company's Expectations:** Emphasize to the Third Party the need to act firmly within the framework of ethics.
- **Local Law:** Take advice on local laws to confirm that the Company's terms with the Third Party are legal under applicable laws.
- **The Contract:** ensure that the Company's relationship with the Third Party is fully documented by a written contract. This should record the nature, the prohibition against paying bribes, the requirement to keep accurate books and records to enable it to monitor compliance with anti-bribery obligations.
- **Regular monitoring:** monitor the activities of the Third Party.

2.3. Duties of the Company:

- All payments or disbursements of Don Maíz's resources to its Contractors or collaborators, whether national or foreign, must be made through banking channels, in which it is possible to trace all movements and payments.
- All payments for services abroad must comply with the Colombian exchange regime and be channeled through authorized banking entities or through clearing accounts duly registered with Banco de la República.
- All payments made to Contractors or collaborators must be supported by the amounts stipulated in the Contract and may be audited by specialized firms to confirm the legality of the payments, the non-diversion of resources, and the non-concealment of payments to third parties through the contractor, or payments to contractors without contractual justification.

2.4. Prohibitions of the Company:

- The Company may not instruct its employees to make payments in violation of the procedures described above.



3. POLICY S COMPLIANCE

3.1. Corporate policy for gifts and hospitality

Giving and receiving small personal gifts is often part of our local culture and is dictated by tradition. In general, a gift is allowed, as long as it is not expensive or frequent.

Gifts, Entertainment and Hospitality that may normally be accepted are those that do not exceed USD 100 and whose importance does not generate preferences or commitments to the giver or the entities he/she represents.

How to behave?

If you are given a gift or offered hospitality or entertainment, or if you offer a gift, hospitality or entertainment to anyone, you must evaluate whether you could receive or give such gifts in accordance with the requirements of Don Maíz's policies and procedures taking into consideration the following:

3.1.1. Prohibitions for employees

- Gifts in cash or cash equivalents, for example, gift certificates, loans, stock or stock options.
- Inappropriate Gifts, Entertainment and Hospitality, for example, anything that is indecent, sexually explicit or that may adversely affect the organization's reputation and commitment to respect and decency.
- Gifts, Entertainment and Hospitality that violate any law, local regulation or rule of the recipient's organization. If there is any doubt in this regard, you should always consult the Ethics Line to obtain a ruling on the approval of such an exception for Gifts, Entertainment and Hospitality given or offered as part of an agreement under which something is to be given in return. Similarly, Gifts, Entertainment and Hospitality that could be viewed as having a material effect on any business transaction that has been (or may be) entered into by the organization or that may otherwise create a conflict of interest.
- Gifts, Entertainment and Hospitality not accurately and transparently recorded in the Company's financial records.

3.1.2. Gifts and hospitality allowed

Promotional Gifts, Entertainment and Hospitality that may normally be accepted are those that do not exceed USD 100 and whose importance does not generate preferences or commitments to the giver or the entities he/she represents. These include:

- Gifts such as T-shirts, calendars, diaries, pens, product samples and other promotional items.



- Customary courtesies, such as beverages, food or refreshments provided at a legitimate business meeting.
- Occasional meals with people who are part of a business relationship.
- Necessary and reasonable travel expenses in connection with legitimate business travel.

3.1.3. Gift Guidelines received by Don Maíz from its suppliers, contractors and/or distributors, among others:

- a. Gifts over USD 100 must be returned to the third party sender through a formal short thank you for the gift and indicating the policies, sending the Code of Conduct and a formal thank you letter.
- b. If your teams are in the process of purchasing or closing a business deal, such gifts should not be accepted. In the event of receiving gifts, the gift policy must be made clear in writing to the suppliers and that it will not influence our future decisions.
- c. With respect to gifts of less than USD 100 that are given to our employees, with the knowledge of the immediate supervisor, these may be accepted as long as they are not compromised and must be distributed randomly, in order to ensure the participation of all employees without any particular preference. Dynamics such as raffles may be used or distributed among employees or other types of activities that the team together with the talent area decides not to bias the activity or benefit only one (1) employee.

3.1.4. Gift Guidelines offered by Don Maíz to its distributors and/or customers

- a. Gifts must be promotional and less than USD 100
- b. The president, vice presidents and directors are empowered to send gifts on behalf of Don Maíz.
- c. Gifts to be sent must be Don Maíz products, promotional and/or commemorative Don Maíz products. In general, they must be marked with the Don Maíz logo and must carry a card in the name of Don Maíz.
- d. The following gifts are never acceptable for us or our third parties (such as suppliers, contractors, distributors, customers, among others) to give:
 - Gifts without a Don Maíz logo.
 - Gifts to parties involved in a purchasing process.
 - Gifts that are given as compensation and/or offered for something in return.
 - Monetary gifts (cash, vouchers, credit cards for gifts, etc.).
 - Any object that is illegal, indecent or contrary to Don Maíz's commitment to mutual respect or that adversely affects Don Maíz's reputation.
 - Gifts for which payments are made in person to avoid having to report or request approval



Remember that Don Maíz always expects to count on an adequate behavior from all collaborators and good judgment in any activity that it is leading and that it will preventively avoid any operation that goes against Don Maíz's guidelines.

We are confident that any gifts or presents received or given as part of the year-end celebrations will be clear, transparent and will not generate any type of influence and that all business decisions made are sound and objective by all Don Maíz employees.

3.2. Corporate travel policy

This policy defines the guidelines that frame the request, authorization, generation of tickets, national and international lodging reservations, request for advances and legalizations, of Don Maíz's employees and related parties in the performance of their duties or in activities related to the same, in order to facilitate the management and control of the process. It starts with the request of the air ticket and lodging in the defined tool or with the respective travel agency for such purpose, going through the respective approvals, with those required by each collaborator according to their level within each one of them.

- All requests for airline tickets, accommodations, and approval of travel expenses must be handled through the travel tool or travel agency defined for this purpose.
- Employees who need to manage airline tickets and accommodations must have access to the tool or travel agency available for the request, approval and purchase.
- It is the responsibility of each cost center owner that has an authorized budget for travel expenses to self-manage and control the expense against the budget allocated for this item.

3.3. Financial and accounting management policy

The administrators, employees, suppliers and partners of Don Maiz shall guarantee at all times the integrity, accuracy and reliability of the accounting and financial information, which shall reflect fairly and accurately all transactions in reasonable detail, in accordance with the applicable accounting and tax regulations. It is strictly forbidden to engage in conduct that tends to hide, change, omit or misrepresent accounting records to conceal improper activities or that does not correctly indicate the true nature of a recorded transaction.

4. PHILANTHROPIC DONATIONS AND POLITICAL ACTIVITIES

4.1. Philanthropic Donations:



Philanthropic donations correspond to donations, for example: (money, goods, use of Company facilities, sponsorships, resources or time of Employees) given to charitable or non-profit organizations, for the benefit of the community or for philanthropic purposes.

- ***No political donations will be made under any circumstances.***

With regard to philanthropic donations, Employees should be aware of the risk that they may be used as a front for corruption and other improper purposes. A philanthropic donation will be permitted, provided that it complies with the following guidelines:

- It is known who is the recipient of the donation and for whose benefit it is being made.
- The donation is made for philanthropic purposes, for and on behalf of a registered or recognized charitable or non-profit organization, and not for a natural person.
- The donation is made in accordance with all legal requirements.
- The donation is duly documented
- The donation is not a requirement for the course of action by any natural person or organization, or it should be made without conditions or expectation of receiving anything in return.
- The donation is not made to secure business or to obtain undue advantage.

Prior to donations, the following must be ensured:

- Know the recipient of the donation and for whose benefit the donation is being made.
- The logistics department is responsible for reviewing and approving requests for philanthropic donations.
- Prior to authorizing any donation, the Approver must ensure the due diligence of the recipient including its reputation and document it.
- In case red flags are identified: Conduct enhanced due diligence, compliance information of the receiving entity, among others.
- Take the necessary measures to ensure that the funds are transferred to a bank account in the name of the receiving entity and in the country concerned (for example: ensure that they are not paid to a Third Party).

4.2. Donations Procedure:

4.2.1. Purpose of donations:

The purpose of all the Organization's donations must be framed within the strategic focuses for Sustainability.



Any donation made outside the relevant items described above must respond to the result of an analysis that justifies the pertinence, relevance and impact of the donation for the beneficiary entity and for Don Maíz and must be approved by the head of logistics.

4.2.2. Entities receiving donations:

The beneficiaries and/or recipients of donations must be selected according to defined criteria and guidelines.

Main guidelines for the selection of beneficiary entities:

- Be legally constituted.
- Be non-profit associations, corporations or foundations, with priority to be direct executors of social impact projects.
- To have structured programs with measurable impact on the beneficiary population and quantifiable indicators to monitor progress over time.
- Be entities that demonstrate a track record in the execution of projects and significant contributions to the beneficiary population.
- To be entities that guarantee the supervision of the resources delivered, with sufficient internal controls to prevent in-kind donations from being sold.
- Be entities that do not represent a reputational risk for the organization (i.e. no questions associated with the entity, its beneficiaries, founders, directors, funders, among others).

4.3. Verification and Audit:

All guidelines, processes, formats and other elements associated with this policy shall be subject to verification by Don Maíz's internal and external audit, in accordance with the procedures defined for such purpose.

Any action that is not within the framework of this policy or information reported that is not truthful will be considered serious misconduct and will give rise to the sanctions provided for in the Internal Work Regulations.

5. Political Activities

Don Maíz observes strict political, religious and philosophical neutrality. Therefore, the Company's policy is not to make financial contributions to political candidates, elected representatives, political parties or religious institutions.



Don Maíz also respects the personal political, religious and philosophical affiliations of its employees. However, these affiliations must not affect Don Maíz's activities or image, nor may they affect the company's neutrality in these matters.

5.1. Employee duties

- Respect the beliefs of others.
- Exercise their freedom of opinion and political activity outside the scope of their employment, on their own account and exclusively on a personal basis.
- Explain clearly that he only represents his personal opinions when he participates in political activities, and in no way represents or disseminates any position or guidelines of Don Maíz.
- Obtain approval from your superior before communicating on behalf of Don Maíz with government representatives on political matters.
- Think about Don Maíz's reputation and how the public would perceive his actions when interacting with government representatives.
- Notify your supervisor or Compliance Management if you are contacted by a government official outside of your normal activities.

5.2. Employees prohibitions

- Using Don Maíz's facilities, equipment or any other assets for political activities.
- Make a political statement on behalf of Don Maíz or associate Don Maíz with your personal political views.
- Use Don Maíz's corporate image to support their political opinions.
- Use your position at Don Maíz to encourage anyone to make contributions for political purposes or to support a political party.
- Using or allowing the use of Don Maíz's assets or resources for a campaign, a political party or a political candidate.
- Using donations for the benefit of the community to hide contributions for political purposes.

6. PROCEDURES FOR MERGERS AND ACQUISITIONS.

6.1. Business structure and negotiation procedure

The purpose of this procedure is to define the structure and operating model of the acquisition of new business structures to be carried out by means of the information generated in the analysis of the evaluations previously carried out in order to manage the negotiation of the initiative with the candidate.



Don Maíz initially prepares and analyzes the possible corporate, financial, legal, tax and other structures to determine which is the most viable option that generates the greatest added value to the business and corresponds to the best interest of the shareholders.

In view of the above, the following procedure must be followed:

- a) **Generate proposals for business structure and operating model:** For new relationships with the structures of interest to Don Maíz, we initially prepare and analyze the possible corporate, financial, legal, tax and other structures to determine which is the most viable option that generates the greatest added value to the business and corresponds to the greatest interest of the shareholders.

Subsequently, the different operating models that are most viable for generating greater added value to the business once the transaction is completed and that allow the implementation of the identified synergies to be maximized are analyzed. Each of the team members must study in depth the operating model of the aspect of their expertise and determine the advantages, disadvantages and possible contingencies of its implementation. Based on this, the most convenient operating model should be agreed upon from all areas.

Finally, the results of the analysis developed, and the corresponding recommendation of the most viable business structure and operating model are presented by the work team. This recommendation must take into consideration the arguments why it is considered the most viable option, as well as the associated risks and the way to mitigate them. If applicable, include in the recommendation the financial impacts and legal procedures necessary to carry out the recommendation.

- b) **Approval of the transaction:** The steering committee approves the most convenient transaction structure according to the analyses presented by the work team and the requirements for the shareholders and/or request adjustments to the potential transactions if applicable.

If the transaction is approved, go to the activity described in paragraph c) of this chapter. *"Make adjustments as recommended by the Steering Committee and submit to the Advisory Committee."*

If the transaction is NOT approved, go to the activity described in paragraph d) of this chapter. *"Inform the Advisory Committee of the analysis and recommendation"*.

- c) **Make adjustments as recommended by the Steering Committee and submit to the Advisory Committee:** The adjustments recommended in the previous activity have been made. This review contemplates the possible corporate, financial, legal, tax and operational structures, among others.



The advisory committee approves the purchase in accordance with the company's interests. If approved, the transaction process should continue and adjustments to the presentation should be requested.

If the purchase is approved, go to the activity described in paragraph e) of this chapter. *"Define the business structure and operating model"*.

In case the purchase is NOT approved go to the activity described in item j) of this chapter. *"Notify the candidate that the transaction is not proceeding."*

- d) Report the analysis and recommendation to the Advisory Committee:** Report the results of the analysis developed, in accordance with the adjustments requested by the Steering Committee, regarding the recommendation of the most viable business structure and operating model by the work team.

This recommendation should take into consideration the arguments why it is considered the most viable option, as well as the associated risks and how to mitigate them. If applicable, include in the recommendation the financial impacts and legal procedures necessary to carry out the recommendation.

- e) Define the business structure and operating model:** Subsequently, the Advisory Committee approves the business structure and operating model that meets the interests of the company and shareholders.
- f) Structuring the form of negotiation:** The following is a strategic structure of how the negotiation will be carried out so that the agreement is reached according to the conditions and instructions of the Advisory Committee.
- g) Negotiate business conditions and the economic offer:** Negotiation with the candidate of the main conditions agreed in the binding offer in accordance with the analysis developed by the work team and the instructions of the Advisory Committee.

While these conditions must be in compliance with the Advisory Committee's approval, they must also meet the candidate's expectations. The main objective of this activity is to reach an agreement that is beneficial to the shareholders and the company, and at the same time, that is in the best interest of the candidate and can lead to the closing of the transaction.

You must immediately define whether you agree to continue with the transaction based on the minimum negotiated parameters, which will be set forth in the Contract.

If the offer is accepted, go to the activity described in paragraph i) of this section *"Receive the offer approved by the candidate"*.



In case the offer is NOT accepted, go to the activity described in paragraph g) of this section *"Negotiate business conditions and economic offer"*.

- h) **Submit economic offer and negotiation conditions:** A binding offer is prepared in accordance with the negotiation of conditions with the candidate. This offer includes the minimum conditions of the transaction, or value offered, form of payment, legal and corporate requirements, conditions precedent for the transaction, among others. Send the binding offer to the candidate for review and signature if he/she agrees with what has been presented.
- i) **Receive the offer approved by the candidate:** The binding offer with the candidate's signature is then received for signature by the company's legal representative, continuing the process.
- j) **Notifying the candidate that the transaction is not going ahead:** The candidate is notified of the negative decision to continue with the transaction based on the results of the detailed analysis, the possible contingencies and the recommendation of the work team involved.

The flow diagram and its respective symbology corresponding to this process can be found in Annex II of this Program.

7. Remuneration and commission payments to employees and counterparties.

Don Maíz will remunerate the work performed by its collaborators in accordance with the terms of their respective employment contracts and labor legislation. Don Maíz will not deliver commissions or additional remuneration of any kind to its counterparties, other than the payment due for the rendering of services or the supply of goods, as agreed in the respective contracts. All payments made by Don Maíz to collaborators or counterparties shall be made through the proper banking channels, in which it is possible to determine the traceability of all movements.

All payments made to counterparties must be supported by the values stipulated in the contracts and/or purchase orders and may be audited by Don Maíz or a specialized third party to confirm the legality of the payments, the non-diversion of resources, and the non-concealment of payments to third parties through the counterparty, or payments to counterparties without contractual justification. No Don Maíz employee may make payments that violate the PTEE or Don Maíz's internal policies.

8. ROLES AND RESPONSIBILITIES

8.1. Corporate Ethics and Transparency Program Management Bodies

In order to carry out the efficient and effective development of the controls established herein, the following are certain functions of the management bodies. These functions may be modified according to



Don Maíz's business reality and are not understood as mandatory, as they are merely guidelines for the development of the Program.

8.2. Functions of Don Maíz's highest corporate body

- a. To issue and define the Compliance Policy.
- b. Define the profile of the Compliance Officer according to the Compliance Policy, without prejudice to the provisions of this Chapter.
- c. Designate the Compliance Officer.
- d. Approve the document that contemplates the PTEE.
- e. Assume a commitment aimed at the prevention of C/TB Risks, in such a way that the Regulated Entity can conduct its business in an ethical, transparent and honest manner.
- f. Ensure the provision of the economic, human and technological resources required by the Compliance Officer to perform his or her duties
- g. To order the pertinent actions against the Associates, who have the functions of management and administration in the Obligated Entity, the Employees, and administrators, when any of the foregoing infringes the provisions of the PTEE.
- h. Lead an appropriate communication and pedagogical strategy to guarantee the effective dissemination and knowledge of the Compliance Policies and the PTEE to Employees, Associates, Contractors (in accordance with the Risk Factors and Risk Matrix) and other identified stakeholders.
- i. Establish the criteria for the linking of PEP's counterparties.

8.3. Legal Representative:

8.3.1. Functions of the Legal Representative:

The functions of the Legal Representative with respect to this Chapter are as follows:

- a. Submit with the Compliance Officer, for approval of the board of directors or the highest corporate body, the proposal of the PTEE.
- b. Ensure that the PTEE is articulated with the Compliance Policies adopted by the board of directors or the highest corporate body.
- c. Providing effective, efficient and timely support to the Compliance Officer in the design, management, supervision and monitoring of the PTEE.



d. In those cases where there is no board of directors, the legal representative shall propose the person who will occupy the function of Compliance Officer, for the designation by the highest corporate body.

e. To certify before the Superintendencia de Sociedades the compliance with the provisions of the in this Chapter, when required by this Superintendency.

f. Ensure that the activities resulting from the development of the PTEE are duly documented, so as to allow the information to be responsive to criteria of integrity, reliability, availability and compliance, effectiveness, efficiency and confidentiality. The documentary supports shall be kept in accordance with the provisions of Article 28 of Law 962 of 2005, or the rule that modifies or replaces it.

8.3.2. inabilities and incompatibilities of the Legal Representative

Due to the difference in the functions that correspond to the legal representative and the Compliance Officer, the legal representative should not be appointed as Compliance Officer.

8.4. Compliance Officer

8.4.1. Functions

a. Submit with the legal representative, for approval of the board of directors or the highest corporate body, the proposal of the PTEE.

b. Submit, at least once a year, reports to the board of directors or, if necessary, to the board of directors, and, at least once a year, to the board of directors, default, to the highest corporate body. As a minimum, the reports shall contain an evaluation and analysis of the efficiency and effectiveness of the PTEE and, if necessary, of the, If necessary, propose the respective improvements. Likewise, demonstrate the results of the management of the Compliance Officer and the management of the Obligated Entity, in general, in compliance with the PTEE.

c. Ensure that the PTEE is articulated with the Compliance Policies adopted by the board of directors or the highest corporate body.

d. Ensure effective, efficient and timely compliance with the PTEE.

e. Implement a Risk Matrix and update it according to the needs of the company.



of the Obligated Entity, its Risk Factors, the materiality of the Risk C/TB and in accordance with the Compliance Policy.

f. Defining, adopting and monitoring actions and tools for risk detection C/TB, in accordance with the Compliance Policy for preventing C/TB Risk and the Risk Matrix.

g. Ensure the implementation of appropriate channels to allow any person to confidentially and securely report non-compliance with the PTEE and possible suspicious activities related to Corruption.

h. Verify the due application of the whistleblower protection policy that the Obligated Entity has established and, with respect to employees, the policy of prevention of workplace harassment in accordance with the law.

i. Establish internal investigation procedures in the Regulated Entity to detect non-compliance with the PTEE and acts of corruption.

j. Coordinate the development of internal training programs.

k. Verify compliance with the Due Diligence procedures applicable to the Obligated Entity;

l. Ensure the proper archiving of documentary supports and other information.
on C/TB risk management and prevention.

m. Design the methodologies for classification, identification, measurement and control of the Risk C/TB that will be part of the PTEE; and

n. Perform the evaluation of compliance with the PTEE and the C/TB Risk to which the Obligated Entity is exposed.

8.4.2. Requirements

- a. Enjoy the ability to make decisions to manage C/TB Risk and have direct communication with, and report directly to, the Shareholders' Meeting.
- b. Have sufficient knowledge of C/TB risk management and understand the ordinary course of business of the Obligated Entity.
- c. To have the support of a human and technical work team, in accordance with the C/TB Risk and the size of the Obligated Entity.



- d. Not to belong to the administration, to the corporate bodies or to belong to the statutory audit body (to act as statutory auditor or to be linked to the statutory audit firm that performs this function, if applicable) or whoever performs similar functions.
- e. When the Compliance Officer is not employed by the Obligated Entity, this natural person may or may not be linked to a legal entity.
- f. Not to serve as Compliance Officer, principal or alternate, in more than ten (10) Companies. To serve as Compliance Officer of more than one Obligated Company, (i) the Compliance Officer must certify; and (ii) the body that appoints the Compliance Officer must verify that the Compliance Officer does not act as such in companies that compete with each other.
- g. When there is a corporate group or a declared situation of control, the Compliance Officer of the parent or controlling company may be the same person for all the companies that make up the group or conglomerate, regardless of the number of companies that make up the group or conglomerate.
- h. Be domiciled in Colombia.

8.4.3. inabilities and incompatibilities of the compliance officer

- Belonging to the corporate bodies, the statutory auditors, internal audit or being a legal representative. This prohibition does not extend to those who support the work of the internal audit bodies.
- Act as Compliance Officer in more than ten (10) obligated companies, when they do not belong to the same corporate group.

8.5. Statutory Auditor:

The statutory auditor must report to the competent authorities any act of corruption that he/she becomes aware of in the course of his/her duties. In fact, Article 32 of Law 1778 of 2016, which adds paragraph 5 of Article 26 of Law 43 of 1990, imposes on statutory auditors the express obligation to report to the criminal, disciplinary and administrative authorities, for the alleged commission of crimes, which they detect in the exercise of their duties, even in spite of the professional secrecy.

8.5.1. Inabilities and incompatibilities of the Statutory Auditor

Due to the difference in the functions that correspond to the statutory auditor and the Compliance Officer, the statutory auditor should not be appointed as Compliance Officer.

8.6. Contributors:

It is the duty of all employees within the company to know, abide by and respect the guidelines contained in the Transparency and Business Ethics Program.



Conflicts of interest between the different parties related to PTEE, in which personal interests are opposed to those of the company and may generate a personal, economic or commercial benefit for one of the parties to the detriment of the other, or affect the transparency, fairness and responsibility of the decision-making process within the company, will be resolved based on the guidelines of the code of conduct and in compliance with the applicable regulations.

9. Risk identification.

Don Maíz recognizes that, within the execution of the Company's social activity, it may be associated with the risks listed below, through allied companies such as customers or suppliers, its internal collaborators, shareholders, and in general all Stakeholders, which are:

- **Legal Risk:** This refers to the risk that arises due to violations and non-compliance with laws and other regulations issued both nationally and internationally, which may result in the Competent Authorities initiating proceedings and investigations against the Company, any Internal Collaborator or any third party involved. The legal risk may also give rise to the opening of disciplinary proceedings within the Company.

This risk includes the risk of incurring in any type of sanction, whether economic or of any other nature, imposed by an administrative or judicial authority, national or foreign, on the Company or any Internal Collaborator or Stakeholder Group involved with the Company. This risk also refers to the sanctions that may be imposed within the Company in relation to persons who incur in the conducts prohibited in this PTEE or in any conduct that constitutes a fault against the Company's anti-corruption and anti-bribery policy.

- **Reputational Risk:** Refers to the possibility that a negative, unfavorable and counterproductive public opinion may be formed with respect to the Company, its subsidiaries, its Internal Collaborators or any third party linked to our organization, which may result in loss of Clients, decrease in revenues or judicial and/or administrative proceedings.
- **Contagion Risk:** This refers to the risk that the improper actions of the Company may spread and compromise its subordinates, if any, its shareholders, internal collaborators, suppliers and any third party related to the organization. In the same sense, there is a risk of contagion when the actions of any Internal Collaborator, Supplier and any third party that has a relationship with the organization, has a negative impact on our Company.
- **Financial Risk:** Refers to the risk of economic loss of the Company due to poor financial management by its employees.



9.1. Identification of C/TB risk factors

Transparency International, *Transparencia por Colombia*¹ and the OECD² were used as sources to determine the risk factors.

9.2. Risk Factors

Corruption and Transnational Bribery Risks are recognized at this stage. In particular, risks related to the hiring, admission or contracting of collaborators, senior managers, associates and contractors and those related to the handling of payments in the company are identified.

For the recognition of Corruption and Transnational Bribery Risks, the risk factors should be classified taking into account the following aspects:

9.2.1. Country risk

For Transnational Bribery Risks, it refers to nations with high corruption perception indexes, which are characterized, among other circumstances, by the following:

- The absence of an independent and efficient administration of justice,
- A high number of public officials questioned for corrupt practices,
- The lack of effective rules to combat corruption and the lack of transparent policies on public procurement and international investment.

The persons responsible for establishing international Businesses or Transactions with third parties located in the countries that meet the aforementioned characteristics have the function of reviewing and updating these counterparties annually in accordance with the due diligence procedure provided for such purpose.

Additionally, the persons in charge of linking counterparties shall have as a fundamental guideline for this risk factor the Transparency International corruption perception indexes and the list of countries, jurisdictions, domains, associated states or territories as non-cooperative and low or no taxation ("tax havens") of Article 1.2.2.2.5.1. of Decree 1625 of 2016 and any regulation that adds, modifies or replaces it. These updates do not constitute a substantial modification of this PTEE.

Persons responsible for establishing International Business or Transactions with third parties located in countries with a medium-high CPI must act in consideration of this situation and strictly observe the provisions of this PTEE Manual.

¹ National Transparency Index - Results 2015 - 2016.

² OECD Foreign Bribery Report - An Analysis of the Crime of Bribery of Foreign Public Officials 2014.

**Warning signs:**

- Entering into a contractual, merger or acquisition relationship with a customer, supplier, or business partner that is located in jurisdictions with high corruption rates
- The Client, supplier or business partner is owned or controlled by one of the parties from a jurisdiction that is on the list of countries, jurisdictions, domains, associated states or territories as non-cooperative and low or no taxation ("tax havens") of article 1.2.2.2.5.1. of Decree 1625 of 2016.

9.2.2. Economic Sector Risk

According to the report prepared by the OECD for the year 2014, there are economic sectors with a higher risk of corruption. In this sense, the risk should be determined depending on the economic sector to which the Company belongs and the suppliers and contractors with which or through which the legal business is being executed.

Additionally, the degree of risk increases in countries with high corruption perception indexes and, under certain circumstances, when there is frequent interaction between the Legal Entity, its Collaborators, Senior Management or its Contractors with Foreign Public Officials. When local regulations demand a large number of permits, licenses and other regulatory requirements for the development of any economic activity, corrupt practices are also facilitated in order to expedite a particular procedure.

Warning signs:

- Failure to properly investigate complaints received through the channels provided for this purpose by the Company.
- Offering gifts, hospitality, donations or gifts in order to favor the Company or an employee in the name and on behalf of DON MAIZ.
- Carrying out operations, business or contracts in economic sectors that have a high corruption and bribery index.
- Due to the size and geographic scope of the Company, it is exposed to the possibility that its collaborators and contractors may be involved in conflicts of interest.
- Offering any advantage that favors the Company in import or export processes, participation in public or private bids, administrative, judicial or criminal proceedings, and in general any offer that in light of the policies and manuals implemented by the Company may be considered as an unethical or criminal activity.



- Establish or maintain links with assets (financial, movable and immovable property) to which precautionary measures have been decreed as a result of criminal proceedings or forfeiture of domain crimes related to corruption and transnational bribery.

9.2.3. Third party risk:

This criterion implies the need for the participation of third parties, such as contractors or subordinate companies, in the conclusion and/or execution of legal transactions. The risk increases in countries that require intermediaries for the execution of an international business or transaction, in accordance with local customs and regulations.

The participation of a Legal Entity in collaboration or risk-sharing contracts with Contractors or that the latter are closely related to high-level government officials of a particular country, in the context of an international transaction, is considered high risk.

Warning signs:

- Benefit a third party (communities, municipalities, etc.) for the development of social or philanthropic investment projects that the Company intends to implement.
- Linking or creating clients that are related to conduct related to corruption or transnational bribery or that are referenced in restrictive lists.
- Selection and linking of suppliers that are related to corruption and transnational bribery offenses or that are referenced in restrictive lists; or that once they have been updated, there is evidence of any criminal news.
- Linking of talent that has any type of relationship with Corruption and Transnational Bribery, is reported in any restrictive list or has a judicial or criminal record, or that once it has been updated, there is evidence of any criminal news.
- Linking PEPs directly and indirectly in reliance on their status and not requesting knowledge information and that they are engaged in activities associated with C/TB.
- Establish and maintain commercial ties with natural and/or legal persons that purchase the company's products abroad and that are related to or investigated for activities related to corruption and transnational bribery.
- The supervisor or whoever acts in his stead, fails to enforce the clauses or policies of a contract entered into with a supplier or contractor.
- That any of its collaborators or customers act as an unauthorized distributor, making use of the discount of the products as a collaborator for the sale of products to a third party.
- Disclosing privileged information to a third party regarding activities related to the transportation and commercialization of products marketed by the Company.



- Entering into factoring or confirming transactions with persons involved in transnational corruption and bribery
- Detour of personal resources, improper payments to third parties and unsupported expenses
- Failure to record purchase, sale and payment transactions that give rise to tax liability.
- Intentional act by one or more individuals of management, employees, or third parties, resulting in a misstatement of the financial statements involving falsification or alteration of records or documents, misappropriation of assets, suppression or omission of the effects of transactions in records or documents, recording of transactions without substance, and misapplication of accounting policies.
- Concealment of information in investigation processes before state or governmental entities.
- Absence of permanent monitoring of cash paid and received.
- Inappropriate use of petty cash funds
- Intentional use of the company's assets for non-permitted activities, for its own benefit or for the benefit of third parties.
- Intentionally authorizing payments for activities performed or goods received without due support or without complying with the technical and quality requirements in order to obtain a benefit for oneself or for a third party.
- To favor the hiring of personnel without complying with the established procedures in order to obtain an undue advantage.
- Alteration, distortion, deletion of payroll records
- To constitute rights in rem with owners, possessors, holders and occupants that may affect the Company's reputation.
- Financing of political campaigns for personal gain on behalf of the Company.

9.3. Measuring the risk of corruption and transnational bribery:

Once the risks are identified through the management methodology, a mechanism has been defined to measure the level of severity of the risk by determining the probability of occurrence and the impact in case of materialization, which allows establishing the level of risk in the development of the Company's activities, which can be seen in the annexes ***"Risk Identification Matrix and Transnational Bribery" and "Don Maíz segmentation procedure"***.

A methodology was established to perform the segmentation of the different factors of Corruption and Transnational Bribery (C/TB) risks, in order to determine those segments that, according to their level of risk, require a higher frequency and greater detail in monitoring, see annex ***"Don Maíz segmentation procedure" and "Don Maíz segmentation matrix"***.

Once the risk factors are evaluated, the tabulation weighting assigns a rating to the counterparties identifying the level of risk:

- Low with a rating of 1



- Moderate with a rating of 2
- Intermediate with a score of 3
- High with a rating of 4
- Critical with a rating of 5.

The score will place the counterparty in a rating cell, depending on the risk of the development of its activity and its nature, in order to monitor its transactions with the periodicity recommended by the risk category.

Monitoring Table		
AL/FT/FPWMD Risk Profile - C/TB	Rating	Monitoring
1 - Low Risk	0, < 2	Annual
2 - Moderate Risk	>2 < 4	
3 - Intermediate Risk	>4.1 < 5	Semiannual
4 - High Risk	> 5.1 < 6	
5 - Critical Risk	>8 < 10	

The segmentation matrix will be reviewed on an annual basis of the variables to examine whether it effectively provides knowledge about the third party.

The compliance area may also include other factors in addition to materiality that allow for more knowledge of the third party, its environment and economic activity.

9.4. CONTROL AND MONITORING OF COMPLIANCE POLICIES AND PTEE.

Due to the complexity and changing nature of the legal relationships with state entities or international or national businesses or transactions carried out by Don Maíz, the risks of corruption and transnational bribery to which it may be confronted will also change. Therefore, the Company, through the Compliance Officer, shall evaluate and implement the techniques deemed most appropriate to periodically verify and evaluate the effectiveness of its procedures to prevent any act of Corruption, as well as update its compliance policies when necessary, and at least once every two (2) years.

In the same sense, Don Maíz shall take into account the legislative and regulatory changes that occur in the different jurisdictions where it operates, as well as any other changes that may have consequences with respect to its Compliance Policies and its PTEE. The company may implement any or some of the following procedures to control and supervise the Compliance Policies and the PTEE:

- a. Supervision by the Compliance Officer with respect to the management of the risk of corruption and transnational bribery in legal relations with administrative entities or in international or national



businesses or transactions in which Don Maíz participates. To this effect, the administrators shall implement mechanisms that allow them to verify the effectiveness of the procedures aimed at preventing any act of corruption.

- b. Conducting periodic Compliance Audits and Due Diligence procedures, as required by the Compliance Officer.
- Within the monitoring routines of the program, commissions within the commercial area will be taken into account for sales results, which will be analyzed by channels and, depending on whether the variation generates a warning signal, a more detailed analysis will be performed on a semi-annual basis.
 - Donations will be monitored by third party and depending on whether the behavior is out of the average, on a quarterly basis.
 - For food, lodging, travel, gifts and benefits to third parties, a semi-annual analysis of the behavior will be made with the basis provided by the accounting area and depending on the behavior if it is above average, a more detailed analysis of each case will be made.
 - For the correct application of accounting policies, the accounting records and controls defined in the annex *"Corruption and transnational bribery risk identification matrix"* will be taken into account.
 - Don Maíz will monitor payments by means of sampling that Don Maíz makes abroad on a semi-annual basis.

10. OUTREACH AND TRAINING

The PTEE shall be disclosed within the Company to Internal Employees and relevant officers and other interested parties, in the form and frequency to ensure proper compliance, at least once a year. Likewise, the Company shall provide training to those Internal Employees who have responsibility in the process with higher propensity to corruption risks and Transnational Bribery (government procurement, relationship with high risk countries) this training should be carried out at least once (1) a year. Disclosure and training shall be sufficiently documented.

Training and disclosure shall remind managers of their obligation to prevent corruption. The annual disclosure of information shall contain as a minimum:

- The financial controls policy,
 - the delivery of gifts and donations,
 - the whistleblower channel and sanctions for employees and managers.
- a. Raise awareness of the C/TB Risks to which the Obligated Entity is exposed.
- b. To be updated when circumstances so require, in response to the changing dynamics of the specific risks of Corruption faced by Employees, managers and Associates.



Therefore, greater attention should be given to individuals or businesses that are more exposed to such risks, such as Employees or Associates involved in government contracting activities or distribution businesses in countries or geographic areas with a high risk of Transnational Bribery. Likewise, anti-corruption training must be extended to those Contractors identified by the Compliance Officer, as established in the Risk Matrix and the Compliance Policy.

Don Maíz has implemented a tool that makes it easier for Contractors, Employees and Associates to access, know and be trained on the Compliance Policies and the PTEE of the Obligated Entity.

11. WHISTLEBLOWER PROCEDURE

11.1. Complaints channel.

Don Maíz provides Compliance Subjects with a mechanism through which they can contact the Compliance Officer in order to resolve any concerns regarding the scope and interpretation of Don Maíz's PTEE.

The Company has an ethics line that allows its shareholders, directors, employees and dependents in good faith, confidentially and without fear of retaliation, to report irregular conduct in the following matters to the organization:

- Conflict of Interest with Third Parties
- Non-compliance with PTEE Policies and Procedures

Employees, Suppliers, Contractors or Senior Management shall send their communications in matters related to the PTEE, confidentially, in good faith and without fear of reprisals to the Compliance Department through the following channels:



01-8000 188899
(1) 5 71 86 23 en C/marca



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In any case, the Directorate shall maintain the confidentiality of the complainant, the facts investigated, and the person or persons against whom the complaint has been filed.

Compliance Subjects must keep in mind that it shall be a violation of the PTEE not to denounce or report actions known to them that have been executed by any other Compliance Subject, or when they refuse to



cooperate in investigations that arise on the occasion of a complaint. Don Maíz shall not undertake any retaliation against any Compliance Subject who, in good faith, reports through viable alternatives any behavior that in its judgment may constitute a violation of the Company's Corporate Ethics Program. The Compliance Officer shall adopt the pertinent measures to protect the whistleblower and shall verify that no harassing conduct is undertaken against whistleblowers.

11.2. Transnational Bribery Report to the Superintendencia de Sociedades

The Company will inform its Employees of the following channels available for reporting situations that may constitute Transnational Bribery:

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

The Superintendencia de Sociedades has made available the following reporting channels in the event that acts of Corruption and Transnational Bribery committed by Colombian legal entities or branches in Colombia of foreign legal entities are identified.

- **Report of allegations of Transnational Bribery to the Superintendencia de Sociedades.**

Transnational Bribery Reporting Channel available at the following link:

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

- **Report of complaints of acts of corruption to the Secretariat de Transparencia.**

Channel for reporting acts of Corruption available at the following link:

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

- **Requests for information from authorities.**

Responses to requests for information on the PTEE made to the Company by the different competent authorities will be coordinated and dealt with through the Compliance Officer.

The Compliance Officer shall evaluate the response and the documents to be sent to the control entities. In the case of control entities such as the Superintendencia de Sociedades and the Transparency Secretariat, the Compliance Officer may deliver, according to his criteria, all the necessary information for the corresponding review and verification.



12. SANCTIONING REGIME OF THE PTEE

12.1. Penalties and Procedure for their Imposition

In the event of non-compliance with any of the components of the PTEE, Don Maíz may impose labor sanctions on the Subjects of Compliance as a result of the investigation carried out by the Compliance Officer. The foregoing is without prejudice to the administrative or criminal sanctions imposed by the corresponding authorities.

For the purposes of the PTEE, the procedures and the staggering of faults will be taken into account in accordance with the provisions of the Internal Work Regulations implemented by Don Maíz.

13. DUE DILIGENCE PROCESS

13.1. Due diligence:

This due diligence procedure includes reputational, legal, accounting (financial), third party relationship, sanctions (criminal, disciplinary, penal) to mitigate risks related to suppliers, customers, employees, business partners and third party intermediaries. This policy consists of the following steps:

- a) **Initiation of the due diligence process:** For new relationships with suppliers, customers, collaborators, business partners and third parties, the due diligence process must be initiated by the person in charge of the relationship, by requesting documentation and filling out the knowledge forms.
- b) **study the information and supporting documentation:** The person in charge of the relationship will study the information and documentation provided by the third party. He/she must ensure that the information provided is truthful and corresponds to reality. In the case of suppliers, the area in charge has the obligation to verify that the work to be performed by the supplier in favor of Don Maíz corresponds to the social activity registered by the third party.
- c) **Complete reports of external detection and due diligence:** The areas in charge of the linkage must make the consultation in restrictive and control lists prior to the linkage and the support of the consultation generated by the tool in force must be left.
- d) **Evaluate the file for linkage approval:** In the event that the consultation yields any coincidence in restrictive and control lists or any warning sign, the support must be sent to the Transparency and Compliance area of Grupo Alpina to proceed to perform the respective Intensified Due Diligence and will depend on the analysis and approval of the Compliance Officer.



13.2. Enhanced due diligence

The process through which the Company adopts additional and more intense measures for the knowledge of the Counterparty, its business, operations, products and volume of transactions. It implies an advanced knowledge of the Counterparty and the origin of the assets received, in order to prevent the Company from being used as a means for the execution of illicit activities that may lead to incurring in any legal, operational, contagion or reputational risk. For this purpose, the defined internal procedures shall be used.

The enhanced due diligence process shall contain at a minimum:

- Consultation in the tool provided, additional, individual consultation in restrictive lists, control lists, search in public sources and press releases.
- Depending on the criticality of the case, a more detailed report of the counterparty's information will be generated in the tool provided (financial, accounting, economic activity, commercial relations, international operations).
- A report must be generated with all the information gathered, which will depend on the approval of the compliance officer.

In addition to the measures applied within the due diligence process, the following procedures, among others, must be applied for these counterparties:

- Approval of the Compliance Officer to bind or to continue the contractual relationship.
- Request for additional information to determine the origin of the funds, as defined by the Compliance Officer for such purpose.
- Constant monitoring of the operations carried out with the third party and in general of the contractual relationship.

13.3. PEP counterpart liaison

The areas of Don Maíz in charge of the counterparty selection and engagement processes shall take into account the characteristics and criteria for classifying third parties as PEPs, according to the definitions established in this manual and the applicable regulations.

Don Maíz's areas in charge of the counterpart liaison processes must carry out the following activities:

- Once the area in charge of linking the counterparty identifies the PEP status, it must ensure that the information and supports required by Don Maíz to know the PEP status are complete.
- The query must be made in restrictive and control lists, leaving support of the query.



- The report must be made to Grupo Alpina's Transparency and Compliance area, which will proceed to conduct enhanced due diligence of the counterparty, making sure to identify and verify the identity of the PEP and related persons,
- The due diligence report must be sent to the Compliance Officer for analysis and respective approval.

13.3.1. Criteria defined by Don Maíz's highest corporate body (PEP, family nucleus, close associates)

- No matches on restrictive and watch lists (related to C/TB offenses), analysis of past and current investigations, convictions for corruption, bribery and other related offenses.
- Enhanced Due Diligence (Evaluate the perception of legal background, media reputations, and individual inquiries)
- Determine whether the counterparty's sources of income are legitimate
- Evaluate the level of the PEP position and its duration. Example: (Minister, Mayor, Councilor) since a higher level position may generate a higher level of risk.
- Approval by the Compliance Officer.

14. DUTY OF CONFIDENTIALITY OF INFORMATION

The supporting documentation of the program is located in a SharePoint provided by the company, where you can find documentation and information related to: counterpart linkage, training, disclosures and enhanced due diligence.

Regarding the procedures for archiving and conservation of documents related to International Business or Transactions, there is a repository in the Logistics Department, which is shared with the Customs agency, which will be kept for a period of 10 years.

15. ANTI-CORRUPTION CLAUSES IN DON MAÍZ CONTRACTS

Don Maíz undertakes that in the execution of the contracts it enters into, the risk of Acts of Corruption, or of the Contractors performing Acts of Corruption, will be limited to the maximum extent possible. To this effect, all contracts entered into by Don Maíz with employees, contractors or any third party or intermediary shall include clauses that protect Don Maíz and offer it legal remedies when its counterpart performs Acts of Corruption.

15.1. Duties of the Company

In all contracts, Don Maíz will inform its counterparty of the requirement to comply with the Anti-Corruption Provisions, as well as of the existence of the Program.



15.2. Contractors' Duties:

In accordance with the contract, the Contractor must comply with the Anticorruption Provisions and the burdens imposed by this program, otherwise Don Maíz may make use of the contractually agreed termination powers.

The anti-corruption clauses are included in Annex VI of this Program, in any case, if the Company considers that they require any modification, which is more adapted to compliance with the applicable regulations, they may do so without the need to modify this document, as long as it is approved by the corresponding area.

16. Update of the PTEE

This program must be reviewed, updated and approved at least every two (2) years by the Board of Directors or highest corporate body and/or when new legal or internal regulations must be considered.

Any changes will be communicated to all Employees, as well as to the stakeholders to whom they apply.

Related Documents

Annex I PTEE

PTEE Definitions

Annex II

Transnational Bribery and Corruption Risk Identification Matrix

Annex III

Don Maíz segmentation procedure

Annex IV

Don Maíz Segmentation Matrix

Annex V

Annex Anti-Fraud, Anti-Bribery, Anti-Corruption.

Change Control



Note: It is the responsibility of the person responsible for the policy to ensure that the information contained in this document is constantly updated.

Date	Version History	Comments on the version	Proposed by:	Approved by:	Date of Approval
12/12/2022	1	Implementation of the Manual	Financial Management Meranti Abogados	Highest corporate body	03/10/2023
11/06/2024	2	PTEE update	Gilberth Sanabria	Ana Maria Silva	26/06/2024