

## **TRANSPARENCY AND BUSINESS ETHICS POLICY (PTEE in Spanish)**

The Transparency and Business Ethics Program is established under the declaration of four (4) main principles, which should reflect our actions at all levels and integrate the general principles and values of behavior at work, framed in the Code of Conduct "Nuestra Forma de Trabajo" ("Our Way of Working") in the company, which should inspire the actions of employees at all levels.

**Principle of integrity and transparency:** We always do what is right in an honest, clear, and straightforward manner, in accordance with the law and the policies set by the company, and we relate to all our stakeholders in an open, transparent, fair, and dignified manner.

**Principle of shared responsibility:** Each person who is part of the staff has a shared responsibility with the company in the preservation of our ethical reference and transparency of our collective actions. Under the principle of loyalty, they are committed to the Company to defend responsible conduct and are obliged to report any act that goes against the ethical reference.

**Principle of inclusion and diversity:** We respect the individuality, diversity, and dignity of people, in an environment of mutual recognition, respect for the obligations and rights of those who are part of this organization. We recognize the multiplicity of people as the best opportunity to grow together and enrich the organization in the places and cultures where we interact.

**Principle of coherence and consistency:** We always act seriously and consistently with our values and principles, aligned and committed to the corporate strategy. We strengthen an organizational culture in which our thinking is in line with what we communicate and with each of our actions. In accordance with the above, every person linked to the company by any means is jointly responsible for the proper and correct application of the transparency and business ethics program and especially has the full support of Senior Management to act in line with the principles and values stated in this document and in the Company's Code of Conduct.

For this reason, the Company's General Management and Board of Directors value and recognize the efforts and commitment of those who act with rectitude and ensure the integrity of business management.

The Company, in line with best practices, has implemented systems, procedures, and control and reporting mechanisms through the transparency hotline, among others, in order to ensure the prevention, identification, and treatment of acts and behaviors that are considered unlawful because they lack legitimacy and transparency.

The Company prohibits any type of bribery or act of corruption, and requires compliance with all anti-corruption and anti-bribery regulations, including External Circular Letter 100-000011 of 2021 of the Superintendencia de Companies (Superintendencia de Sociedades).



The report is received in detail, guaranteeing confidentiality of information and due process. Whoever makes a report of a possible act of Corruption or Bribery within or related to the company, shall not be, nor may be subject to retaliation, punishment, sanction, revenge, aggression, or offense by the Company or by the persons related to the event while retaining the employment relationship with the company.

**The Transparency Hotline** has a whistleblower protection category to identify whether retaliation has been taken against people who have reported alleged irregularities to the Transparency Hotline or have disclosed information that has been shared with people who have access to the Hotline's cases or its investigations.

The company's employees may submit their questions or concerns to the PTEE Compliance Officer regarding risks or other concerns associated with the application of the provisions of this program, as well as all those aspects related to possible acts or circumstances that may lead to the materialization of risks of Corruption and national or transnational bribery, for which they may contact through the following email: [cumplimiento@nutrimenti.com.co](mailto:cumplimiento@nutrimenti.com.co) y [cumplimiento@nutrium.co](mailto:cumplimiento@nutrium.co).

VERSION	DATE	REASON FOR THE UPDATE
2	Apr/17/2024	<ul style="list-style-type: none"> <li>• Issuance of the document.</li> <li>• Support the company's transparency and business ethics program in accordance with circular letter 100-000011 of 2021.</li> </ul>