

CODE OF CONDUCT

FOR CLIENTS AND SUPPLIERS



GreenLand

www.greenland.co

FRAMEWORK FOR ACTION

At Grupo GreenLand and the companies that make up the group, we include suppliers, clients, and allies that are strategic for achieving our organizational objectives by basing our relationships on trust and operating efficiency, under an ethical commitment by the parties, and respect for the environment. This is the reason why this Code of Conduct is aimed at setting up the minimum principles and guidelines that clients and suppliers must follow for the proper implementation of their activities.

SCOPE OF THE CODE OF CONDUCT

This Code of Conduct applies to all clients and suppliers of Grupo GreenLand and to all the companies that make up the Group.

Clients and suppliers are required to know and comply with this Code of Conduct which Grupo GreenLand agrees to make available on the Company's web page and through any other dissemination channels deemed necessary.

SELECTION AND HIRING

Selecting and hiring or suppliers of goods and services will be carried out following the method of free market participation and the guidelines established in Grupo Greenland's Goods, inputs, and services negotiation policy.

Grupo GreenLand will only hire suppliers that are properly incorporated.

HUMAN RIGHTS AND WORKING CONDITIONS

Grupo GreenLand's clients and suppliers must respect human rights and treat their employees and others with whom they interact in their operations with dignity, always ensuring that there is no discrimination based on sex or sexual orientation, race, social status, religious, political, or union ideas, age, or disability.

As Grupo GreenLand's clients and suppliers, you agree to:

- Reject all forced/or mandatory labor.
- Eradicate child labor from all stages of their activities, unless all applicable laws are followed.
- Compensate their workers according to applicable wage laws, guaranteeing their right to rest and complying with the currently applicable labor laws.
- Facilitate the right of collective association without fear of reprisals, and follow all applicable regulations in every case.

SAGRILAFT AND SIPLAFT RISK MANAGEMENT

To comply with current regulations and company procedures about money laundering and terrorist financing, clients and suppliers to Grupo GreenLand agree to:

- Comply and have your employees and associates comply with the current regulations about money-laundering, terrorist financing, weapons proliferation, corruption, and transnational bribery.
- Ensure that the resources or goods used to do business with Grupo Empresarial GreenLand come from licit activities, as defined by current laws.
- Not allow third parties to make deposits into its accounts using money from illegal activities as defined in the Colombian Penal Code, and any other regulations that complement them, or carry out transactions intended to help those activities or in favor of individuals associated with such activities.
- Ensure that they are not in any list of individuals processed for or related to activities involving drug traffic, money-laundering, subversion, terrorism, arms trafficking, or crimes associated with sexual tourism of minors. That, as of this date, and to the best of their knowledge, they are not involved in any investigation related to the above.
- Provide the information and documents required in the process of creating, updating, and extending third parties, which are key for the continuous due diligence process carried out within the framework of these systems.

QUALITY, ENVIRONMENT, AND OCCUPATIONAL HEALTH AND SAFETY

Grupo GreenLand's clients and suppliers must work responsibly to care for the environment and will include quality in their organizational processes, including:

- Meeting all the requirements and regulations about quality in order to offer goods and services that meet the needs of Grupo GreenLand.
- Meet the quality standards and parameters for the products and/or services provided for Grupo GreenLand.
- Comply with the regulations about the environment, laws, resolutions or agreements involving environmental protection and preservation, according to the company's activities.
- Implement an environmental policy or related good practices in accordance with the goods and/or services provided.
- Apply all the regulations involving occupational health and safety.

CONFLICTS OF INTEREST

Clients and suppliers must notify Grupo GreenLand or any of its companies, about any potential or actual conflicts of interest involving their employees, members of the Board of Directors, or Statutory Auditor.

Clients and suppliers agree to implement and maintain mechanisms to deal with conflicts of interest guaranteeing their independence and compliance with current legislation.

GIFTS OR DONATIONS

Companies working for Grupo GreenLand and all its companies, agree to abstain from offering, soliciting, giving, or accepting goods in cash or in kind, such as gift cards, bonuses, gifts, commissions, or any other compensation to influence an action or decision by a third party, to illegally obtain or retain commercial advantages from completing their contracts.

PROTECTING THE INFORMATION

With respect to protecting the information, clients and suppliers agree to:

- Protect the confidentiality of the information they receive during their business activities with Grupo GreenLand and its companies. This information is reserved and can only be disclosed with the express authorization from the respective company. The information must not be used for personal use or by a third party for fraudulent purposes. Therefore, the client or the supplier must prevent the disclosure of the information and protect it as if were their own.
- Abstain from using Grupo GreenLand or its Companies' brand or image to benefit from the Organization's name.
- Disclose Grupo GreenLand or its Companies' confidential information only to such employees who need to know it. And such employees must be advised of the existence of this Code of Conduct and the other documents that constitute it.
- Notify Grupo GreenLand and its Companies about the unauthorized use or disclosure of confidential information between the parties, and work together to resolve any situation that might arise.
- Adopt good information security management and administration practices.

FRAUD, CORRUPTION, AND BRIBERY PREVENTION

Grupo GreenLand's clients and suppliers must carry out their business relations based on the principles of integrity and rectitude, according to the Corporate Transparency and Ethics Program. Thus, they agree to:

- Meet the requirements of Grupo GreenLand's policies on fraud, corruption, and bribery prevention, acting with integrity, impartiality, honesty, and sincerity, and complying with all applicable laws.
- Provide and update any information required for the business relationships among the parties, and comply with all requirements, and ensure that the information is true, secure, and accurate.
- Implement security and control mechanisms to ensure that the resources are only derived from licit activities.
- Reject all forms of corruption, extortion, national and trans national bribery, and to prevent the materialization of money laundering, terrorist financing, and fraud risks. In the event they are required to have a money laundering and terrorist financing system, it must comply with the applicable regulations under the law.
- Avoid any type of bribery or unethical behavior that violates the principles of Grupo GreenLand and any of the companies in the group.
- Reject relations with illegal groups and social actors outside the law.
- Report to Grupo GreenLand, through its transparency hotline, any suspicion or event involving fraud, corruption, or bribery.

TRANSPARENCY HOTLINE

At Grupo GreenLand, we have a transparency hotline to report unusual situations that might affect good relations among the parties.

- Telephone: 01-8000-11-11-00.
- Email: greenland@lineatransparencia.com.
- Web form: www.lineatransparencia.com/greenland.

The client and supplier agree to use these communication channels to report any improper conduct that violates this Code of the Corporate Governance and Ethics Code of Grupo GreenLand.



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