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Process:	<b>PTEE COMPLIANCE MANUAL</b>						

**COMPLIANCE MANUAL OF THE BUSINESS  
TRANSPARENCY AND ETHICS PROGRAM**

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## 1. INTRODUCTION

The Compliance Manual of the Business Transparency and Ethics Program (PTEE) of PRONAVÍCOLA S.A.S. aims to disseminate the Organization's Principles and Policies regarding the management of Corruption and/or Transnational Bribery (C/TB) risk. By doing so, we seek to inform employees, partners, clients, suppliers, contractors, and the general public of its objectives so that they can focus their efforts on its application.

For PRONAVÍCOLA S.A.S., a policy is a guideline that governs the actions of a person or department in a specific matter. Our policies represent a general statement of principles that reflect the Organization's stance in a defined area and, once adopted, become non-negotiable and mandatory behavioral standards.

Each employee of PRONAVÍCOLA S.A.S. understands that their behavior has a direct impact on the Organization's reputation. Their obligation as members of PRONAVÍCOLA S.A.S. is to understand, apply, and align their conduct with the policies set forth in this document.

## 2. GLOSSARY

**Senior Executives:** Natural or legal persons appointed in accordance with the company bylaws or any other internal provision of the legal entity and Colombian law, as applicable, to manage and direct the legal entity, whether as members of collegiate bodies or as individuals.

**Partner:** Natural or legal persons who have contributed capital, labor, or other assets of monetary value to a company in exchange for shares, equity interest, or any other form of participation recognized by Colombian law.

**Compliance Audit:** A systematic, critical, and periodic review of the proper implementation of the Business Transparency and Ethics Program.

**Employee:** An individual who is contractually obligated to render a personal service under subordination to a legal entity or any of its subsidiaries in exchange for compensation.

**Contractor:** In the context of an international business or transaction, any third party that provides services or has a contractual legal relationship of any nature with the

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Organization. Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants, or persons who are part of collaboration or shared risk contracts with the Organization.

**Corruption:** All conduct aimed at benefiting a company or seeking a benefit or interest for it, or using it as a means to commit crimes against public administration or public assets, or to engage in acts of transnational bribery.

**Due Diligence:** In the context of this Manual, due diligence refers to the periodic review of legal, accounting, and financial aspects related to a business or transaction, intended to identify and evaluate the risks of Corruption and/or Transnational Bribery (C/TB) that may affect the Organization, its subsidiaries, and its contractors. For contractors, it is also recommended to verify their creditworthiness and reputation.

In no case shall the term "Due Diligence" as defined in this Manual refer to due diligence procedures used in other risk management systems (e.g., anti-money laundering and counter-terrorist financing), which are governed by different regulations.

**Compliance Officer:** A natural person appointed by the Organization to lead and manage the Risk Management System for Corruption and/or Transnational Bribery. This same individual may, if so decided by the competent bodies of the legal entity, also assume responsibilities related to other risk management systems, such as those concerning money laundering and terrorist financing, or the protection of personal data.

**PEP:** Stands for Politically Exposed Persons. These are public officials within any job classification system of the national or regional public administration who, in the positions they hold, have—either directly or by delegation—responsibility for general management, policy formulation, adoption of institutional plans, programs and projects, or the direct handling of state assets, funds, or valuables. This may include functions related to budget execution, public contracting, management of investment projects, payments, settlements, and administration of movable and immovable state property. The term also includes Foreign PEPs and PEPs from International Organizations.

**PEPs from International Organizations:** These are natural persons who hold executive positions in an international organization, such as the United Nations, the

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Organisation for Economic Co-operation and Development (OECD), the United Nations Children's Fund (UNICEF), and the Organization of American States (OAS), among others (e.g., directors, deputy directors, board members, or any person performing an equivalent function).

**Foreign PEPs (Politically Exposed Persons):** These are natural persons who hold prominent and high-ranking public functions in another country. Specifically, the following individuals are included: (i) Heads of state, heads of government, ministers, deputy ministers, or secretaries of state; (ii) Members of congress or parliament; (iii) Members of supreme courts, constitutional courts, or other high-level judicial bodies whose decisions are not normally subject to appeal, except in exceptional circumstances; (iv) Members of courts or boards of central banks; (v) Ambassadors; (vi) Chargés d'affaires; (vii) Senior officials of the armed forces; (viii) Members of administrative, management, or supervisory bodies of state-owned enterprises; (ix) Members of reigning royal families; (x) Senior leaders of political parties or movements; and (xi) Legal representatives, directors, deputy directors, senior management members, and board members of an international organization (e.g., heads of state, high-ranking politicians, senior government, judicial or military officials, and senior executives of state-owned enterprises).

**Compliance Policies:** These are the general policies adopted by the Senior Management of a legal entity to ensure that it conducts its business in an ethical, transparent, and honest manner, and is capable of identifying, detecting, preventing, and mitigating risks related to Corruption and/or Transnational Bribery.

**Business Transparency and Ethics Program (PTEE):** This is the document that outlines the compliance policy and the specific procedures under the responsibility of the Compliance Officer. Its purpose is to identify, detect, prevent, manage, and mitigate the risks of Corruption and/or Transnational Bribery (C/TB) that may affect the Organization, in accordance with the risk matrix and other instructions and recommendations established in this manual.

**Corruption Risks:** This refers to the possibility that, through action or omission, the purposes of public administration may be diverted or public assets may be affected for private gain.

**Transnational Bribery Risks or ST Risk:** This refers to the possibility that a legal entity, either directly or indirectly, gives, offers, or promises a foreign public official sums of money, items of monetary value, or any benefit or advantage in exchange

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for that official performing, omitting, or delaying any act related to their duties and in connection with an international business or transaction.

**Foreign Public Official:** According to Paragraph One of Article Two of Law 1778, this refers to any person who holds a legislative, administrative, or judicial position in a state, its political subdivisions, or local authorities, or in a foreign jurisdiction, regardless of whether the individual was appointed or elected.

A foreign public official is also considered to be any person who performs a public function for a State, its political subdivisions, or local authorities, or within a foreign jurisdiction, whether within a public body, a state organization, or an entity whose decision-making power is subject to the authority of the State, its political subdivisions, local authorities, or a foreign jurisdiction.

Any official or agent of an international public organization shall also be considered to hold such status.

**Transnational Bribery:** This is the act by which a legal entity, through its employees, administrators, shareholders, contractors, or subsidiaries, directly or indirectly gives, offers, or promises to a foreign public official: (i) sums of money, (ii) items of monetary value, or (iii) any benefit or advantage, in exchange for that official performing, omitting, or delaying any act related to their duties in connection with an international business or transaction.


**Subsidiary Company:** According to Article 260 of the Colombian Commercial Code, a company is considered a subsidiary or controlled entity when its decision-making power is subject to the will of another person or group of persons, known as the parent company or controlling entity. This control may be direct, in which case the entity is referred to as an affiliate, or indirect—through or with the participation of the parent company's other subsidiaries—in which case it is referred to as a subsidiary.

### 3. OUR PTEE COMPLIANCE POLICIES

#### 3.1 Policy on Management and Prevention of Corruption and/or Transnational Bribery (C/TB)

The General Shareholders' Meeting and the Legal Representative of PRONAVÍCOLA S.A.S. expressly affirm their commitment to the implementation of

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procedures aimed at identifying, detecting, preventing, and mitigating the risks associated with Corruption and/or Transnational Bribery (C/TB) in connection with all operations or business activities of the Organization in which a national or foreign public official may be involved.

To fulfill this commitment, the following actions will be undertaken:

- Provide the financial, human, and technological resources required by the Compliance Officer to carry out their duties.
- Implement procedures to identify, prevent, and mitigate risks related to Corruption and/or Transnational Bribery (C/TB).
- Establish an anonymous reporting channel that allows employees, contractors, or other third parties to report any warning signs or situations related to Corruption and/or Transnational Bribery (C/TB).
- Promote the anonymous reporting channels provided by the Superintendency of Companies and the Secretariat of Transparency so that employees, contractors, or other third parties can report any warning signs or situations related to Corruption and/or Transnational Bribery (C/TB).
- Develop policies and procedures aimed at mitigating conflicts of interest among employees, partners, contractors, and other counterparts that could encourage or facilitate acts of corruption and bribery involving national or foreign public officials.
- Apply Due Diligence processes that include periodic reviews of the legal, accounting, and financial aspects of a business or transaction, with the aim of identifying and assessing Corruption and/or Transnational Bribery (C/TB) risks that could affect the Organization, its subsidiaries, and its contractors. For the latter, additional checks should be conducted to verify their creditworthiness and reputation.
- Take appropriate administrative and legal actions against the Organization's administrators and employees when any of them violate the provisions established in the Business Transparency and Ethics Program.
- Lead an effective communication strategy to ensure the dissemination of compliance policies and the Business Transparency and Ethics Program to employees, partners, contractors, and the general public.

### 3.2 Due Diligence Policy

PRONAVÍCOLA S.A.S. establishes as a policy the assurance that Due Diligence is carried out by employees or third parties specialized in this task, ensuring at all times

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that they have sufficient human and technological resources to conduct periodic reviews of the legal, accounting, and financial aspects related to business dealings or transactions with counterparts assessed as having a critical C/TB risk profile. The goal is to identify and evaluate the risks of Corruption and/or Transnational Bribery (C/TB) that may affect the Organization, its subsidiaries, and its contractors.

In line with the above, the following guidelines have been established:

- Any engagement or contracting activity with natural or legal persons that involves the payment or exchange of assets, whether in cash or in kind, under any title, must be carried out in accordance with the provisions of this Manual and the Organization's SAGRILAF Manual.
- Agreements entered into with various natural or legal persons must include clauses as a mechanism to prevent the risk of Corruption and/or Transnational Bribery (C/TB), with the purpose of providing legal grounds for the unilateral termination of the contractual relationship if the other party is formally linked by the authorities to investigations related to Corruption and/or Transnational Bribery (C/TB) offenses.

### 3.3 Compliance Audit Policy

PRONAVÍCOLA S.A.S. will ensure the systematic, critical, and periodic review of the proper execution of the Organization's various Compliance Risk Management Systems.

The Assurance Body designated by the company must include in its audit programs a specific component focused on verifying the processes and controls related to the prevention and management of compliance risks, in order to assess the effectiveness of each stage and element of the aforementioned Systems.

Based on the results and conclusions of this work, the Assurance Body must submit reports to the Compliance Officer, who will then initiate the necessary corrective actions. Likewise, other relevant bodies will be informed of the findings from the review of the Compliance Risk Management System.

### 3.4 Due Diligence Policy in Acquisitions

In cases where PRONAVÍCOLA S.A.S. undertakes operations as a potential acquirer (such as mergers, acquisition of assets, shares, equity interests, or any other type of corporate restructuring process), the company will ensure that Due Diligence activities are carried out either by the Internal Audit department or by an

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external expert firm. The objective is to identify all the economic components of the described operations and any contingencies related to potential acts of Corruption and/or Transnational Bribery (C/TB).

### 3.5 Due Diligence Policy for the Organization's Accounting

PRONAVÍCOLA S.A.S. is required to maintain complete and accurate accounting books and records. Expenses, liabilities, and contingencies must be described thoroughly and precisely in all business documentation—not only in terms of amounts, but also in terms of their nature and purpose. Therefore, it is strictly prohibited to create false or misleading records, or to accept any record from suppliers or third parties that does not meet the company's requirements.

To ensure this standard, the Organization will require the Statutory Auditor to include in their audit plans the verification of accounting accuracy and to ensure that no direct or indirect payments related to Corruption and/or Transnational Bribery (C/TB) are concealed in the Organization's money transfers or other asset transactions.

### 3.6 Policy on Payment of Compensation and Commissions to Contractors

When PRONAVÍCOLA S.A.S. needs to engage contractors for the development of its operations—whether as suppliers, intermediaries, agents, distributors, advisors, consultants, or other third parties involved in collaboration or shared risk contracts with the Organization—it shall not make or promise any payment beyond what is stipulated in the agreement, and only in exchange for legitimate goods or services. In all cases, such payments must correspond to the fair market value of the legitimately received goods or services and must not exceed that amount.

Likewise, before hiring any contractor, due diligence must be carried out to verify the third party's suitability, creditworthiness, or reputation, and to ensure that there are no legal or commercial impediments to their interaction with national or foreign public officials on behalf of PRONAVÍCOLA S.A.S.

Notwithstanding the above, PRONAVÍCOLA S.A.S. expects its contractors to commit to complying with all applicable laws in this regard and to uphold the highest ethical standards of business conduct.

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### **3.7 Policy on Gifts, Entertainment, and Invitations Offered by Employees, Contractors, and Partners**

As part of PRONAVÍCOLA S.A.S.'s policy, employees, partners, and contractors—the latter considering their specific legal relationship with the Organization—are not permitted to give gifts, make entertainment-related payments, or extend invitations to third parties.

Exceptionally, employees, partners, and contractors may offer gifts, make payments for entertainment activities, and extend invitations—but only on occasions where such gestures are considered acts of courtesy and are exclusively related to their professional activities.

Under no circumstances shall the exceptional giving of gifts, entertainment payments, or invitations be considered as an incentive for a national or foreign public official to omit, perform, expedite, or delay any action within their responsibilities.

To determine when gifts, entertainment payments, and/or invitations are appropriate and strictly related to professional activities, employees, partners, and contractors must adhere to the following guidelines:

- Gifts, entertainment payments, and/or invitations must be modest in nature.
- Under no circumstances may gifts, entertainment payments, and/or invitations be made in cash. Payment for these purposes must be made directly to the supplier of the product or service and must be supported by the corresponding invoice. Additionally, there must be no contractual relationship between the supplier and the recipient.
- Gifts, entertainment payments, and/or invitations must be granted in good faith.
- Gifts, entertainment payments, and/or invitations must be occasional.
- Such gifts, entertainment payments, and/or invitations must not violate local morals or accepted standards of conduct.
- Gifts, entertainment payments, and/or invitations must comply with all applicable local laws and regulations.
- Gifts, entertainment payments, and/or invitations must be regarded as courteous or friendly gestures and must align with accepted business practices.
- All gifts, entertainment payments, and/or invitations must receive prior approval from the company and be subject to its expense policies and

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procedures. These guidelines must be followed in all exceptional cases where a gift or entertainment payment is made, including instances where the expense is covered using the personal funds of employees, partners, or contractors.

### **3.8 Policy on Gifts, Entertainment Payments, and Invitations Granted to Employees and Partners**

Payments, gifts, commissions, meals, and courtesies are not necessary to foster healthy business relationships. Employees and partners of the Organization shall not accept payments, gifts, meals, courtesies, or trips in exchange for favoring third parties who are linked to or seeking to establish a relationship with the company.

However, they may accept tokens of appreciation, invitations, and public recognition for their performance on behalf of PRONAVÍCOLA S.A.S., as well as training and attendance at events, provided these do not represent a personal benefit to the employee or partner and do not compromise their objectivity in decision-making.

In any case, the employee must report to their immediate superior and the partner to the General Shareholders' Meeting all situations in which they are offered gifts or attentions of any nature, so that they can guide their actions with the highest ethical criteria.

### **3.9 Sponsorship Policy**

In cases where PRONAVÍCOLA S.A.S. organizes or participates in events sponsored by itself or third parties for the purpose of promoting its products or obtaining another commercial benefit, the Due Diligence Policy for the engagement of Contractors shall apply.

Any invitation extended by PRONAVÍCOLA S.A.S. to a national or foreign public official to attend events sponsored by the company shall not be interpreted as a proposal conditioned upon the official performing, omitting, or delaying any task within their responsibilities.

In all such cases, the purpose of inviting national or foreign public officials to these events must be to strengthen their knowledge of topics related to the Organization's corporate purpose. Additionally, all invitations must be made in good faith.

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### 3.10 Donations Policy

PRONAVÍCOLA S.A.S. may make donations through its employees and partners, in accordance with the procedures established by the Organization. These donations must be made for charitable purposes, in good faith, and without resulting in any economic benefit for the Organization other than those permitted by law.

The Donations defined in the preceding paragraph must be made in compliance with all applicable laws and regulations.

Recipients of the Donations shall be subject to the Due Diligence policies outlined in this Manual.

### 3.11 Political Contributions Policy

For the Organization, “Political Contributions” are understood as the provision of money, items of monetary value, or other economic benefits in favor of a political party, political candidate, or political campaign.


Only members of the General Shareholders’ Meeting may authorize political contributions on behalf of the Organization, such as donations or contributions to political parties, political campaigns, or third parties publicly or privately connected to them.

Nevertheless, employees and partners of PRONAVÍCOLA S.A.S. may make Political Contributions in their personal capacity and as private individuals. In such cases, they must always bear in mind that they are affiliated with PRONAVÍCOLA S.A.S., and that their actions could be mistaken as those of the Organization. Therefore, they must take all necessary and appropriate measures to ensure that their political involvement is not perceived as directly or indirectly representing PRONAVÍCOLA S.A.S.

In line with this guideline, the following activities are considered unauthorized for employees and partners of PRONAVÍCOLA S.A.S.:

- Using the Organization’s assets, services, or equipment, as well as working hours, to carry out or support their personal Political Contributions.
- Requesting reimbursement or recognition, in whole or in part, from the Organization for their Political Contributions.

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Recipients of political contributions shall be subject to the Due Diligence policies outlined in this Manual.

### 3.12 Documentation Maintenance Policy

In order to ensure the highest level of cooperation with government oversight entities, PRONAVÍCOLA S.A.S. will retain the following documents and records related to the Business Transparency and Ethics Program for a period of ten (10) years:

- Minutes of the General Shareholders' Meeting in which the policies of the Business Transparency and Ethics Program are approved, as well as those documenting the approval of any adjustments or modifications to such policies.
- Instructional materials or manuals outlining the processes through which the approved policies and procedures of the Business Transparency and Ethics Program are implemented.
- Reports submitted by the PTEE Compliance Officer.
- Reports submitted by the Statutory Auditor regarding the operation of the Program.
- Records of training sessions provided to the Organization's personnel on the Business Transparency and Ethics Program.
- The Organization's Code of Ethics and Conduct Guidelines.
- Minutes of the General Shareholders' Meeting documenting the presentation of reports by the Compliance Officer and the Statutory Auditor, according to the required frequency.
- Documents related to Due Diligence processes conducted for the engagement of Contractors, Intermediaries, business partners, and third parties.
- Proof of payments made to Contractors, Intermediaries, for Sponsorships, Gifts, and other permitted and approved expenses.
- Certificates supporting donations and political contributions.
- Documents related to international business or transactions.

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### 3.13 Policy on Updating and Modifying the Business Transparency and Ethics Program (PTEE)

The Organization establishes as policy that the Program must be reviewed and updated at least once every two (2) years, taking into account the Organization's needs, new developments, and changes in regulations issued by oversight and supervisory bodies.

Any modifications made must be approved by the General Shareholders' Meeting.


## 4. RESPONSIBILITIES OF COMPLIANCE GOVERNANCE

### 4.1 General Shareholders' Meeting

In accordance with the Business Transparency and Ethics Program for the prevention of Corruption and/or Transnational Bribery (C/TB), the General Shareholders' Meeting is responsible for the following functions:

- Establish the policies to prevent, detect, and control the risk of Corruption and/or Transnational Bribery (C/TB).
- Promote a culture of transparency and integrity aimed at preventing Corruption and/or Transnational Bribery, where such conduct is considered unacceptable.
- Approve the Compliance Manual and its updates.
- Appoint the PTEE Compliance Officer and their alternate, where applicable, both of whom must hold positions of leadership, trust, and responsibility.
- Ensure the availability of the financial, human, and technological resources required by the Compliance Officer and their alternate to fulfill their duties and to implement the Compliance Policies and the Business Transparency and Ethics Program.
- Include in the agenda of the General Shareholders' Meeting or the corresponding Administrative Body the review of the Compliance Officer's report at least once a year, or whenever deemed necessary, and make decisions based on the matters discussed.
- Issue statements on the reports submitted by the PTEE Compliance Officer and the Statutory Auditor, and follow up on the observations or recommendations adopted, recording them in the meeting minutes.

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- Order the appropriate actions against senior executives and partners with management responsibilities in the Organization when any of them violate the provisions of the Business Transparency and Ethics Program.
- Define the profile of the Compliance Officer in accordance with the Compliance Policy.
- Commit to preventing Corruption and/or Transnational Bribery (C/TB) risks, ensuring that the Organization conducts its business ethically, transparently, and honestly.
- Verify that the Compliance Officer has the necessary availability and capacity to carry out their functions.
- Confirm that the Compliance Officer and the Legal Representative are performing the activities outlined in this Manual and in the Organization's SAGRILIFT Manual.


## 4.2 Legal Representative

The PTEE must include, at a minimum, the following responsibilities assigned to the Legal Representative:

- Present, together with the Compliance Officer, the PTEE proposal for approval by the highest governing body.
- Ensure that the PTEE is aligned with the Compliance Policies adopted by the highest governing body.
- Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the PTEE.
- In cases where there is no Board of Directors, the Legal Representative shall propose the individual to serve as the Compliance Officer, for appointment by the highest governing body.
- Certify compliance with the provisions of this Chapter before the Superintendence of Companies, when required by the authority.
- Ensure that all activities arising from the implementation of the PTEE are properly documented so that the information meets the standards of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality. Supporting documentation shall be preserved in accordance with the provisions of Article 28 of Law 962 of 2005, or any regulation that modifies or replaces it.

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### 4.3 PTEE Compliance Officer

Given the importance of the PTEE Compliance Officer in the implementation, monitoring, and ongoing strengthening of the Organization's Business Transparency and Ethics Program, the following outlines the minimum requirements and main responsibilities for the role:

#### Minimum Requirements:

- Have the ability to make decisions to manage the risk of Corruption and/or Transnational Bribery C/TB and have direct communication with, and report directly to, the Board of Directors or the highest corporate body in the event that there is no Board of Directors.
- Must possess sufficient knowledge in Corruption and/or Transnational Bribery (C/TB) risk management and understand the Organization's core business operations.
- Must have the support of a human and technical team appropriate to the level of Corruption and/or Transnational Bribery (C/TB) risk and the size of the Organization.
- Must not be part of the management team, any corporate governing bodies, or the statutory audit body (i.e., must not serve as Statutory Auditor or be affiliated with the auditing firm performing this role or similar functions within the Organization).
- If the Compliance Officer is not an employee of the Organization, they may be affiliated with a legal entity or not.
- Must not serve as Compliance Officer (either primary or alternate) for more than ten (10) companies. To serve as Compliance Officer for more than one organization, (i) the Compliance Officer must issue a certification, and (ii) the appointing body must verify that the individual does not serve as Compliance Officer for competing companies.
- In the case of a corporate group or declared control relationship, the Compliance Officer of the parent or controlling company may serve as the Compliance Officer for all companies within the group or conglomerate, regardless of the number of companies involved.
- Must be domiciled in Colombia.

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### **Responsibilities:**

- Implement the policies established to prevent, detect, and control the risk of Corruption and/or Transnational Bribery (C/TB).
- Present reports to the highest governing body at least once (1) per year. These reports must include, at a minimum, an evaluation and analysis of the efficiency and effectiveness of the PTEE and, where applicable, proposals for improvement. The reports must also demonstrate the results of the Compliance Officer's performance, as well as the general management's compliance with the PTEE.
- Lead the structuring of the Business Transparency and Ethics Program, which will be set out in a Compliance Manual. The content of this Program is mandatory for all administrators, employees, and partners.
- Define, adopt, and monitor actions and tools for the segmentation, identification, measurement, and control of Corruption and/or Transnational Bribery (C/TB) risk.
- Manage the periodic evaluation activities for Corruption and/or Transnational Bribery (C/TB) risks. These processes may be carried out by employees selected by the Compliance Officer or by third parties contracted by the Organization.
- Appoint the body responsible for designing methodologies, models, and qualitative and/or quantitative indicators of recognized technical value for the timely detection of Corruption and/or Transnational Bribery (C/TB) risk.
- Delegate, if authorized by the highest governing body, the management of the Business Transparency and Ethics Program to other officials in foreign-domiciled subsidiaries, without prejudice to the Compliance Officer's continued role as the highest authority on C/TB risk management both in the Organization and in its subsidiaries.
- Inform the Organization's administrators of any violations committed by employees regarding the Business Transparency and Ethics Program, so that appropriate disciplinary procedures may be initiated in accordance with the Organization's internal labor regulations.
- Lead an effective communication strategy to ensure the internal and external dissemination of the PTEE to employees, partners, and contractors.
- Select and facilitate ongoing training for the Organization's employees in the prevention of Corruption and/or Transnational Bribery (C/TB).
- Ensure that, through the PTEE communication strategy, employees, partners, and contractors are aware of the consequences of violating the Program.
- Provide continuous guidance and support to the Organization's employees and partners regarding the implementation of the Business Transparency and Ethics Program.

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- Manage the Organization's unethical conduct reporting channel.
- Manage internal investigation procedures using the Organization's own human and technological resources or through third-party specialists when there is suspicion that an employee, supplier, contractor, or other stakeholder has violated Law 1778 or the Organization's PTEE.
- Present the PTEE proposal for approval by the highest governing body.
- Implement a risk matrix and update it according to the Organization's specific needs, risk factors, and the materiality of the risk of Corruption and/or Transnational Bribery (C/TB).
- Verify the proper implementation of mechanisms to protect whistleblowers and prevent workplace harassment in accordance with the law.
- Establish internal investigation procedures to detect noncompliance with the PTEE and acts of corruption.
- Ensure compliance with Due Diligence procedures.
- Ensure proper filing and maintenance of documentary evidence and other information related to the management and prevention of Corruption and/or Transnational Bribery (C/TB) risk.
- Carry out an evaluation of compliance with the PTEE and assess the level of Corruption and/or Transnational Bribery (C/TB) risk to which the Organization is exposed.
- Ensure the effective, efficient, and timely implementation of the PTEE.

#### 4.4 Internal Audit

The Internal Audit department must conduct a systematic, critical, and periodic review of the implementation of the Business Transparency and Ethics Program.

It must also include in its audit plans a specific program to verify and ensure compliance with the processes and controls related to the prevention and management of Corruption and/or Transnational Bribery (C/TB) risk, in order to measure the effectiveness and compliance of each stage and element of the Program.

Based on the results and conclusions of the work carried out by Internal Audit, reports must be submitted to the Compliance Officer, who will then initiate the necessary corrective actions. Additionally, other relevant bodies will be informed of the findings from the review of the C/TB Risk Management System.

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## 4.5 Statutory Auditor

Within the framework of the Business Transparency and Ethics Program for the prevention of Corruption and/or Transnational Bribery (C/TB), the Statutory Auditor shall have the following responsibilities:

- Ensure that the operations, business dealings, and contracts executed or fulfilled by the Organization comply with the instructions and policies approved by the highest governing body.
- Establish audit systems, in accordance with Article 207 of the Colombian Commercial Code and applicable accounting standards, to verify the accuracy of accounting records and confirm that transfers of money or other assets, resulting from transactions between the Organization and its subsidiaries, do not conceal payments directly or indirectly related to bribes or other corrupt practices.
- Report in writing, at least once (1) a year, to the General Shareholders' Meeting on the level of compliance with the provisions set forth in the Compliance Manual of the Business Transparency and Ethics Program.
- Inform the PTEE Compliance Officer of any inconsistencies or deficiencies identified in the implementation of the Business Transparency and Ethics Program.
- Submit reports, as required by the Superintendence of Companies, regarding compliance with the regulations on Transnational Bribery.
- In countries outside Colombia, these responsibilities shall be carried out by the external auditor or the equivalent authority.
- In accordance with Article 32 of Law 1778 of 2016, which adds subsection 5 to Article 26 of Law 43 of 1990, Statutory Auditors are obligated to report to criminal, disciplinary, and administrative authorities any acts of corruption, as well as any suspected crimes against public administration, the economic and social order, or economic assets that they may detect while performing their duties. They must also report such matters to the company's governing bodies and management. These reports must be submitted within six (6) months of becoming aware of the events. For the purposes of this article, the professional confidentiality normally granted to Statutory Auditors does not apply.
- In fulfilling their duties, the Statutory Auditor must pay special attention to warning signs that may indicate potential acts of corruption.

When such duties must be performed outside the national territory, they shall be carried out by an external auditor or the equivalent authority.

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## 4.6 Employees

The primary duty of PRONAVÍCOLA S.A.S. employees is to maintain a strong commitment to the Policies outlined in this Manual—particularly regarding behaviors associated with Corruption and/or Transnational Bribery (C/TB) as defined by the Organization. This commitment is demonstrated through compliance with the following responsibilities:

- Be familiar with the legal provisions concerning the risk of Corruption and/or Transnational Bribery (C/TB).
- Apply in their daily work the rules, policies, procedures, and instructions established by PRONAVÍCOLA S.A.S., aimed at preventing the materialization of Corruption and/or Transnational Bribery (C/TB) risks through the Organization's operations.
- Adhere to the principles and standards of conduct outlined in the Organization's Ethics and Conduct Guidelines.
- Prioritize ethical principles over the achievement of business objectives.
- Report behaviors or acts related to Corruption and/or Transnational Bribery (C/TB), as defined in this Compliance Manual.

It is the duty of PRONAVÍCOLA S.A.S., its partners, and employees to ensure compliance with the regulations aimed at preventing and controlling the risk of Corruption and/or Transnational Bribery (C/TB), not only to contribute to the achievement of the State's objectives and comply with the law, but also to protect the national and international image and reputation of PRONAVÍCOLA S.A.S.

## 5. SEGMENTATION OF C/TB RISK FACTORS

In order to identify the counterparties with the highest level of exposure to Corruption and/or Transnational Bribery (C/TB) risk, the Compliance Assistant shall carry out the segmentation of the following factors using the **Risk Factor Segmentation Matrix for ML/TF/FPADM – Clients (RE-GE-002)** and the **Risk Factor Segmentation Matrix for ML/TF/FPADM – Suppliers (RE-GE-006)**.

Note: The above activity will apply to counterparties whose individual transactions are equal to or greater than 39 times the Monthly Minimum Legal Wage (SMMLV) for clients and 14 times the SMMLV for suppliers.

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- **Politically Exposed Persons (PEPs) – Foreign Public Officials:** The segmentation of this risk factor will be carried out based on the definitions provided at the beginning of this Manual (Glossary).
- **Jurisdiction:** The segmentation of this risk factor involves identifying countries with the highest levels of perceived corruption. These countries may vary by region and are typically characterized by factors such as the lack of an independent and efficient judiciary, a high number of public officials accused of corrupt practices, the absence of effective anti-corruption laws, and a lack of transparency in public procurement and international investment policies. There is also a risk when the Organization operates through subsidiaries located in countries classified as tax havens, according to the list published by the National Tax and Customs Directorate (DIAN).
- **Economic Sector:** The segmentation of this risk factor is conducted by identifying economic sectors with the highest number of international bribery cases, based on the 2014 report by the OECD on sectors with the highest C/TB risk. These sectors include:
  - Mining/Extraction
  - Construction
  - Transportation and Storage
  - Information and Communication
  - Manufacturing
  - Electricity and Gas Supply
  - Human Health
  - Public Administration and Defense
  - Agriculture, Forestry, and Fishing
  - Wholesale and Retail Trade
  - Water Supply
  - Extraterritorial Organizations and Bodies
  - Financial and Insurance Activities

However, the level of risk exposure may increase when there is frequent interaction between the Organization—its employees, administrators, partners, or contractors—and national or foreign public officials located in countries with high corruption perception indices. This risk is further heightened in jurisdictions where local regulations require a large number of permits, licenses, and other regulatory approvals to conduct any economic activity. According to the OECD, such

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conditions can facilitate the use of corrupt practices to expedite specific procedures.

- **Contractors:** The segmentation of this risk factor involves identifying the counterparty's involvement in business or transactions with clients who have a critical C/TB risk profile. Contractors may include, among others, suppliers, intermediaries, agents, distributors, advisors, consultants, and individuals involved in collaboration or shared risk contracts with the Organization. The risk increases in countries where intermediaries are commonly required to conduct business or transactions due to local customs or regulations. Authorities in other countries consider it high risk when a company enters into collaboration or shared risk contracts with contractors—especially if those contractors are closely connected to senior government officials of a particular country—in the context of an international or local business or transaction.

The C/TB risk profile rating for clients and suppliers will be calculated as follows:

**Clients with a Critical Risk Profile:**

- When the client meets the criteria of a PEP (Politically Exposed Person), PEP from International Organizations, Foreign PEP, or Foreign Public Official.
- When the Jurisdiction or Economic Sector variable is rated as critical.

**Suppliers with a Critical Risk Profile:**

- When they meet the condition of being a contractor in a business or transaction with a client that has a critical C/TB risk profile.

**Clients and Suppliers with a Low-Risk Profile:**

- When they do not meet the conditions to be assessed as counterparties with a critical C/TB risk profile.

## **6. IDENTIFICATION OF WARNING SIGNS AND REPORTING OF AN UNETHICAL EVENT**

Every employee, senior executive, partner, contractor, and any person involved in collaboration or shared risk contracts with PRONAVÍCOLA S.A.S. is obligated to promptly report—through the channels established by the Organization—any situation identified during the course of their activities that contradicts the principles and values set forth in the **Ethics and Conduct Guidelines and the Business**

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**Transparency and Ethics Program** aimed at preventing the risk of Corruption and/or Transnational Bribery (C/TB).

To strengthen the task of identifying situations that must be reported, below are some warning signs provided as guidance in Chapter XIII of the Legal Basic Circular issued by the Superintendence of Companies:

- In the analysis of accounting records, transactions, or financial statements:
  - Invoices that appear to be false, do not reflect the reality of a transaction, or are inflated and contain excessive discounts or reimbursements.
  - Foreign transactions with highly complex contractual terms.
  - Transfer of funds to countries considered tax havens.
  - Transactions lacking a logical, economic, or practical explanation.
  - Transactions that fall outside the ordinary course of business.
  - Transactions in which the identity of the parties or the origin of the funds is unclear.
  - Assets or rights recorded in financial statements that have no real value or do not actually exist.
- In the corporate structure or business purpose:
  - Complex or international legal structures with no apparent commercial, legal, or tax benefits, or holding and controlling a legal entity without a business purpose, particularly if it is located abroad.
  - Legal entities structured with domestic trusts or foreign trusts, or non-profit foundations.
  - Legal entities with structures involving offshore entities or offshore bank accounts.
  - Non-operational companies as defined under Law 1955 of 2019, or those that, based on their business activity, may reasonably be considered “shell companies,” meaning they do not fulfill any legitimate commercial purpose.
  - Companies declared as fictitious suppliers by the Colombian Tax and Customs Authority (DIAN).
  - Legal entities in which the Final Beneficial Owner (as defined in Chapter X) cannot be identified.
- In the analysis of transactions or contracts:
  - Frequent use of consultancy agreements, intermediary contracts, and joint ventures.



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- Contracts with contractors or government entities that create an appearance of legality but lack clear contractual duties and obligations.
- Contracts with contractors that provide services to only one client.
- Unusual losses or profits in contracts with contractors or government entities, or significant changes without commercial justification.
- Contracts containing variable compensation that is unreasonable, or that involve payments in cash, in Virtual Assets (as defined in Chapter X), or in kind.
- Payments to PEPs (Politically Exposed Persons) or individuals close to PEPs.
- Payments to related parties (e.g., partners, employees, subsidiaries, branches) without clear justification.

If it is observed or becomes known that any employee, partner, contractor, or individual has engaged in behavior that contradicts the ethical principles and values of the Organization or undermines the prevention of Corruption and/or Transnational Bribery (C/TB) risks or any other corrupt practice, such incidents must be reported to their immediate supervisor, the PTEE Compliance Officer, the Internal Auditor, the Human Resources Director, or the General Manager.

If the reporting person requires an alternative reporting channel—either because the situation involves one of the above-mentioned individuals or because they wish to ensure complete anonymity—they may do so through the ethical reporting mailbox located on the Organization's website: <http://www.pronavicola.com>.

Reports will be treated confidentially, preserved anonymously, and handled with the understanding that the individual submitting the report is acting in good faith and not with malicious intent to harm others. Investigations will be conducted under the principle of the presumption of innocence, meaning the person being reported will be considered innocent until proven otherwise.

## 7. REPORTING OF TRANSNATIONAL BRIBERY COMPLAINTS

In addition to the internal reporting channels described in the previous section of this Manual, employees, administrators, partners, and contractors of the company may also use the public reporting channel provided by the Superintendence of Companies to inform this authority of any fact or situation related to alleged acts of transnational bribery.

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Reports submitted through this channel may be anonymous. If the report is not anonymous, it must be handled confidentially by the authority.

It is important to note that these reports may lead to the initiation of an administrative sanctioning process for acts of transnational bribery by the Superintendence of Companies against a legal entity or a branch of a foreign company, when there is sufficient merit to do so.

To report conduct related to Transnational Bribery, you may use the following link:

<https://www.supersociedades.gov.co/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional>

## 8. DISCLOSURE AND TRAINING OF THE BUSINESS TRANSPARENCY AND ETHICS PROGRAM

### 8.1 Disclosure

- In line with the international business context of PRONAVÍCOLA S.A.S., our Compliance Manual and related forms are available in both Spanish and English.
- The PTEE Compliance Manual and the Ethics and Conduct Guidelines are permanently available for consultation by employees, suppliers, contractors, and other interested parties on the website: <http://www.pronavicola.com>.
- As part of the disclosure strategy for suppliers and contractors, the Organization will retain evidence of their awareness and acceptance of the policies contained in the PTEE Compliance Manual and the Ethics and Conduct Guidelines through the **Compliance Commitment Form for the Business Transparency and Ethics Program and the Comprehensive Risk Management and Self-Control System for ML/TF/FPADM (DO-GE-001)**.
- As part of the disclosure strategy for clients, suppliers, and contractors, the Organization will include in various contracts or onboarding forms a clause confirming their knowledge of the Organization's general policy on managing Corruption and/or Transnational Bribery (C/TB) risk, as well as the availability of reporting channels created for this purpose.
- The Organization will carry out various awareness strategies for employees through its internal communication channels.

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## 8.2 Training

- A general induction (onboarding) will be provided to new employees of the Organization on dates scheduled by the Human Resources department.
- Periodic refresher sessions will be conducted for employees with higher exposure to the risks managed under the PTEE.
- Mechanisms will be in place to evaluate the results of training in order to determine the program's effectiveness and reach.
- Records will be kept of the training materials used, employee attendance, and the evaluations conducted.
- The training program will include, at a minimum, the following topics:
  - Basic definitions of the PTEE.
  - Current regulatory framework.
  - Policies of the Business Transparency and Ethics Program.
  - Internal communication mechanisms.
  - Responsibilities of employees in implementing prevention tools and mechanisms.
  - Disciplinary regime.

## 9. DISCIPLINARY REGIME

This Manual contains policies that must be observed in all of the Organization's transactions. It has been designed in accordance with the laws of the Republic of Colombia and in compliance with the applicable regulations defined by the Superintendence of Companies. It serves as a formal call to promote and reinforce the obligation to act with integrity, and helps ensure that the Policies are fully understood. Compliance with these policies is mandatory for each and every partner and employee of the Organization.

Each partner and employee is responsible for ensuring strict compliance with legal provisions, internal regulations, and procedures. Tolerating rule violations by supervisors or managers is unacceptable.

Partners and employees working in business processes, supply management, human talent management, and internal control assurance must, in their daily activities, evaluate the degree of compliance with the Policies and provisions outlined herein. They are responsible for detecting any deviations and informing the Compliance Officer so that corrective measures can be taken and, where appropriate, sanctions may be applied.

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The application of the disciplinary regime—resulting from irresponsible, permissive, negligent, inefficient, or omissive actions or behaviors in the commercial or operational development by any executive, employee, or third party that negatively impacts the Organization—shall be governed by the Internal Work Regulations approved by the highest governing body, which are known to all employees.

Disciplinary actions and sanctions will be determined based on each specific case and the severity of the infraction. In all cases, sanctions will be assessed in consultation with the Organization's management to ensure that the measures taken are fair, balanced, and safeguard the rights of both the employees and the Organization.

## **10. CONTROL AND SUPERVISION OF COMPLIANCE WITH THE BUSINESS TRANSPARENCY AND ETHICS PROGRAM**

The overall supervision of compliance with this document is the responsibility of the General Shareholders' Meeting and the Legal Representative of the Organization, in accordance with current regulations.

Compliance with the Policies outlined in this document is the responsibility of the PTEE Compliance Officer of PRONAVÍCOLA S.A.S., appointed by the General Shareholders' Meeting.

Under the direction of the General Shareholders' Meeting, the Legal Representative and the PTEE Compliance Officer of PRONAVÍCOLA S.A.S. will review and update the elements of the Business Transparency and Ethics Program at least once every two years.

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## 11. APPROVAL AND CHANGE CONTROL

CHANGE CONTROL				
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2	28/01/2022	Updates in accordance with Circular Letter 100-000011 dated August 9, 2022, issued by the Superintendence of Companies: <ul style="list-style-type: none"> <li>• Update of the glossary</li> <li>• Update of responsibilities (Highest Governing Body, Statutory Auditor, and Compliance Officer)</li> <li>• Responsibilities of the Legal Representative</li> <li>• Minimum requirements for the appointment of the Compliance Officer</li> <li>• Update of the Due Diligence Policy</li> <li>• Update of the Policy on Management and Prevention of Corruption and/or Transnational Bribery (C/TB)</li> <li>• Policy on Updating and Modifying the Business Transparency and Ethics Program (PTEE)</li> <li>• Chapter on Segmentation of C/TB Risk Factors</li> <li>• Update of the chapter on Internal Reporting of Unethical Events and the catalog of warning signs</li> <li>• Chapter on Reporting of Transnational Bribery Complaints</li> <li>• Update of policies and control activities addressing corruption risk</li> <li>• Change of the update cycle for the Compliance Policy and the PTEE to every two years</li> <li>• Update of the chapter on Disclosure and Training of the PTEE</li> <li>• Update of the chapter on the Disciplinary Regime</li> </ul>	RCTeam	Rafael Serrano General Manager / General Shareholders' Meeting
3	25/03/2025	<ul style="list-style-type: none"> <li>• Update of PRONAVÍCOLA's corporate type from Pronavícola S.A. to Pronavícola S.A.S.</li> <li>• In section 3.1 – Policy on Management and Prevention of Corruption and/or Transnational Bribery (C/TB), the term "<i>General Shareholders' Meeting</i>" replaces the previous reference.</li> <li>• In section 3.8 – Policy on Gifts, Entertainment Payments, and Invitations Granted to Employees and Partners, the phrase "<i>the partner to the Board of Directors</i>" is removed.</li> <li>• In section 3.11 – Political Contributions Policy, "<i>Board of Directors</i>" is replaced with "<i>General Shareholders' Meeting</i>."</li> </ul>	Mario Salazar Compliance Officer	Samuel Cabrera General Manager / General Shareholders' Meeting

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VERSION	DATE	MODIFICATION	PREPARED BY	REVIEWED/ APPROVED BY
3	25/03/2025	<ul style="list-style-type: none"> <li>• In section 3.12 – Documentation Maintenance Policy, “<i>Board of Directors</i>” is replaced with “<i>General Shareholders’ Meeting</i>.”</li> <li>• In section 3.13 – Policy on Updating and Modifying the Business Transparency and Ethics Program (PTEE), “<i>Board of Directors</i>” is replaced with “<i>General Shareholders’ Meeting</i>.”</li> <li>• Corporate type updated from Pronavícola S.A. to Pronavícola S.A.S.</li> <li>• In section 3.1 – Policy on Management and Prevention of Corruption and/or Transnational Bribery (C/TB), “<i>General Shareholders’ Meeting</i>” is replaced.</li> <li>• In section 3.8 – Policy on Gifts, Entertainment Payments, and Invitations Granted to Employees and Partners, the phrase “<i>the partner to the Board of Directors</i>” is removed.</li> <li>• In section 3.11 – Political Contributions Policy, “<i>Board of Directors</i>” is replaced with “<i>General Shareholders’ Meeting</i>.”</li> <li>○ In section 3.12 – Documentation Maintenance Policy, the term “<i>Board of Directors</i>” is replaced with “<i>General Shareholders’ Meeting</i>.”</li> <li>○ In section 3.13 – Policy on Updating and Modifying the Business Transparency and Ethics Program (PTEE), “<i>Board of Directors</i>” is replaced with “<i>General Shareholders’ Meeting</i>.”</li> <li>○ In section 4.1 – Board of Directors, the <i>Board of Directors</i> is removed, and its functions are reassigned to the Legal Representative. In the first paragraph, the mention of the <i>Board of Directors</i> is removed and replaced with the Legal Representative. The following functions are included:               <ul style="list-style-type: none"> <li>- Approve the PTEE proposal as the highest governing body.</li> <li>- Ensure that the PTEE is aligned with the compliance policies.</li> <li>- Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the PTEE.</li> <li>- Certify compliance with the provisions of this chapter before the Superintendence of Companies, when required by said authority.</li> </ul> </li> </ul>	Mario Salazar Compliance Officer	Samuel Cabrera General Manager / General Shareholders’ Meeting

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Process:	<b>PTEE COMPLIANCE MANUAL</b>						

CHANGE CONTROL				
VERSION	DATE	MODIFICATION	PREPARED BY	REVIEWED/ APPROVED BY
3	25/03/2025	<ul style="list-style-type: none"> <li>- Ensure that the activities resulting from the implementation of the PTEE are properly documented so that the information complies with criteria of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality. Supporting documentation shall be preserved in accordance with the provisions of Article 28 of Law 962 of 2005, or the regulation that modifies or replaces it.</li> </ul> <p>The following text is removed:          "Include in the agenda of the meetings of the Board of Directors and the corresponding Administrative Body the review of the Compliance Officer's report, at least once each year, or whenever deemed necessary, and make decisions on the matters discussed."          It is replaced with:          "Review the Compliance Officer's report at least once each year, or whenever deemed necessary, and make decisions on the matters discussed."</p> <ul style="list-style-type: none"> <li>• In section 4.2 – Legal Representative, the entire original section is removed, and its functions are merged with those previously assigned to the Board of Directors.</li> <li>• In section 4.3 – PTEE Compliance Officer, under the subtitle "<i>Minimum Requirements</i>," the phrase "<i>The Board of Directors or the highest governing body in the absence of a Board</i>" is deleted and replaced with: "<i>The Legal Representative as the highest governing body</i>."</li> <li>Under the subtitle "<i>Responsibilities</i>," in bullet point 15, the phrase "<i>with the Legal Representative</i>" is removed.</li> <li>• In section 4.5 – Statutory Auditor, in the third bullet point, "<i>Board of Directors</i>" is removed and replaced with "<i>Legal Representative as the highest governing body</i>."</li> <li>• In section 5 – Segmentation of C/TB Risk Factors, in the first paragraph, the title "<i>Portfolio Coordinator</i>" is removed and replaced with "<i>Compliance Assistant</i>."</li> </ul> <p>The names and codes of the Risk Factor Segmentation Matrices (Clients and Suppliers) are specified.</p>	Mario Salazar Compliance Officer	Samuel Cabrera General Manager / General Shareholders' Meeting

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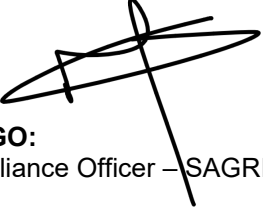

CHANGE CONTROL				
VERSION	DATE	MODIFICATION	PREPARED BY	REVIEWED/ APPROVED BY
3	25/03/2025	<ul style="list-style-type: none"> <li>In section 7 – Reporting of Transnational Bribery Complaints, the link to the reporting channel on the Superintendence of Companies' website is updated.</li> <li>In section 8 – Disclosure and Training of the Business Transparency and Ethics Program, the third bullet point is modified by removing the phrase <i>"commitment letter to the Business Transparency and Ethics Program"</i> and replacing it with: <i>"Compliance Commitment to the Business Transparency and Ethics Program and the Comprehensive Risk Management and Self-Control System for ML/TF/FPADM (DO-GE-001)."</i></li> <li>In section 8.2 – Training, the first bullet point is updated by removing the phrase <i>"with greater exposure to the risk of Corruption and/or Transnational Bribery (C/TB)."</i></li> <li>In section 10 – Control and Supervision of Compliance with the Business Transparency and Ethics Program, all three paragraphs are updated to remove references to the <i>Board of Directors</i>. In the second paragraph, the <i>Legal Representative</i> is added as the highest governing body. In the third paragraph, the word <i>"annually"</i> is replaced with the phrase <i>"at least once every two years."</i></li> </ul>	Mario Salazar Compliance Officer	Samuel Cabrera General Manager / General Shareholders' Meeting
3	25/03/2025	<ul style="list-style-type: none"> <li>In sections 3.13 and 10, the update frequency is modified from <i>once a year</i> to <i>once every two years</i>.</li> <li>In section 3.12 – Documentation Maintenance Policy, an additional item is included related to documents concerning international business or transactions.</li> </ul>	Mario Salazar Compliance Officer	Samuel Cabrera General Manager / General Shareholders' Meeting

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## 12. SIGNATURES

<b>PREPARED BY:</b> MARIO SALAZAR  <b>CARGO:</b> Compliance Officer – SAGRILAFT / PTEE	<b>REVIEWED BY:</b> SAMUEL CABRERA  <b>CARGO:</b> General Manager	<b>APPROVED BY:</b> General Shareholders' Meeting – PRONAVÍCOLA S.A.S.  Excerpt from Minutes of General Shareholders' Meeting No. 76
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