

Organizational Guideline

The company Ingenio Pichichi S.A. has corporate ethics and values that enable it to have a transparent and comprehensive culture.

Our Code of Ethics

Ingenio Pichichi S.A. is committed to the planting, cultivation and harvesting of sugar cane, and the manufacturing and marketing of products derived from sugar cane. These are manufactured thanks to the careful work of its collaborators, to guarantee the sustainability and growth of the company.

The committed contribution of strategic partners, customers, suppliers, communities, and others ensures the best results for the company in its business activities.


Our values; Leadership, Teamwork, Family and Results-Oriented, allows Ingenio to keep growing in a sustainable way through unsure times.

Employees and stakeholders associated with the company must be firmly committed to adopting the corporate values, in accordance with an ethical, honest, respectful, and transparent performance, to guarantee the best image of Ingenio.

Acting with integrity, favoring the preservation of the good image of Ingenio with ethical and responsible decisions, will be possible with the commitment and following up of us all.



Tania Marcela Guapacha L.
General Manager
Ingenio Pichichi S.A.

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ETHICS CODE SUMMARY INGENIO PICHICHI S.A.

Introduction and Scope

Governed by principles of ethics and transparency, focused on Corporate Social Responsibility (CSR) and Sustainability; guided by The Values, framed in The Mission and The Vision. The Board of Directors and Management promote integrity in the attitude and behavior of partners and stakeholders.

The Code of Ethics establishes a conceptual framework, which allows to confront the way of proceeding, requiring the conscious application by all, added to the contribution of strategic partners, customers, suppliers, communities and others, we seek the best results in the activities of Ingenio.

Our values allow Ingenio to continue to grow in a sustainable manner, employees and stakeholders must be committed to appropriate ethical discipline, integrity, honesty, respect, transparency and ensuring the best image of the company. By making ethical and responsible decisions, the commitment to transparency will be achieved.

1. Values:


- **Family:** a "Family-Responsible Organization."
- **Leadership:** a single direction by developing capacity to build the future.
- **Team work:** encouraging integration, based on respect and common purpose.
- **Results oriented:** aligned by the strategic direction to generate wealth and development on the target groups (shareholders, employees, customers, suppliers, community).

2. Target Audience: To collaborators and stakeholders, to people who have any type of contractual relationship or link. We are committed to applying and promoting it through the media.

3. What the Directive Group Does: They are required to set the best example by their actions, as the first people, and they are to be careful in their decision making and relationship with stakeholders. Legitimate actions in pursuit of objectives prevail. Committed to results; they influence by setting a good example, guiding and listening, promote efficient and timely processes, manage through self-control and promote respectful and clear communication.

4. Our Behavior:


- Human Quality; We promote a culture where respect for dignity prevails, complying with corporate values.

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- Respect for the rules; We comply with the rules that regulate us, we protect labor rights and human rights, according to the ILO and Global Pact.
- Compliance with competition laws and regulations; We demand ethical and transparent conduct from our customers and suppliers and use only legitimate means to obtain competitive information.
- Promotes life quality at work as a basis for the growth and preservation of Ingenio; In a safe, dignified and hygienic work environment, we value differences of opinion and cultural diversity.
- Our commitment to responsibility and confidentiality, we never disclose information to third parties without proper and specific authorization, unless there is a legal or professional right or a duty to disclose it.
- Proper use of assets and resources; We must not use Ingenio's assets for personal benefit and must ensure that company assets are not stolen, damaged or misused by others. We are responsible for keeping our work environment clean and orderly. In addition, we are responsible for maintaining operational security at all times. Limited personal use of tools such as computers, e-mail, telephones and the Internet may be acceptable within reason, as long as such use does not generate excessive costs and does not interfere with our job responsibilities.
- Collaborators; We do not expect anything in return for the exercise of our responsibilities. We must have a transparent and equitable management with customers, suppliers and other stakeholders.
- We maintain practices of transparency and integrity; we guarantee fair and honest competition, while respecting confidential information and intellectual property rights.

5. Important Aspects when Acting: In the course of their activities, employees must bear in mind that;

- That our actions shall not affect Ingenio, its employees or third parties.
- That we have the authorization to act or decide and accept our responsibility.
- That our conduct is in accordance with the laws and the standards of Ingenio.
- That our conduct is in accordance with the guidelines of the Code of Ethics.
- That the result of our conduct favors the general interests of Ingenio.
- That we act in a transparent manner.


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6. Relationship with Stakeholders:


- Collaborators; we strengthen the work environment with respect, loyalty and teamwork, always striving to improve the standard of living.
- Suppliers; They supply us with raw materials, products or services for our operations. Their choice is made through competitive processes and purchasing and contracting policies established by the Ingenio, based on ethical, technical, opportunity, price, quality and needs criteria; they are our business allies, and are treated with transparency and integrity, and we expect reciprocal behavior from them.
- Customers; In an integral and transparent relationship, we promote respect for their rights, we address their needs in a timely manner, making clear the conditions between the parties and keeping the confidentiality of the operations.
- Shareholders; In accordance with current regulations and bylaws, we protect your investment, striving for long-term sustainable profitability.
- Community and environment; We recognize value, integrating ourselves in its development and sustainable growth.
- Government; Represented by the powers of the State, they give us the legal framework to develop our activities and guide the relevant public policy. We are bound to contribute by complying with the Constitution, the Laws and the provisions of the authorities.

7. Policies:

- **Money Laundering - Financing of Terrorism/Financing of Weapons of Mass Destruction Proliferation** (hereinafter referred to as LA/FT/FPADM); any relationship with activities or people involved with LA/FT/FPADM will **NOT** be accepted. We have a Self-Control System (SAGRILAFT), performing due diligence on the counterparties' sources of funds and reporting suspicious transactions.
- **Donations and Contributions**; we transparently benefit non-profit organizations and the communities in our area of influence, among others, contributing to the improvement of the quality of life of their inhabitants.
- **Alcohol and illicit drug use**; Any use of alcohol, hallucinogenic drugs or stimulants is prohibited on the premises. The company has the authority to test for hallucinogens or psychoactive substances when it deems it necessary.
- **Preventive Measures on Wrongful Acts and Fraud**; Preventing being a victim of dishonest acts or acts that put employees, products, services or image at risk; any incorrect or fraudulent acts by any employee will be reported to the authorities.

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- **Measures Related to Harassment and Discrimination;** We do **NOT tolerate harassment**, forced labor, rights violations, discrimination, and child labor. Respecting others means that we are careful with the way we treat others and the way we communicate. Remember to consider how you might make other employees, partners and customers feel and don't forget that we all come from different backgrounds so our perspectives may vary. To report go to the Labor Coexistence Committee, Ethics and Compliance Committee and on the channels provided: **Ethical line: Tel. 2547201 Ext. 130-135-Mobile 3185915080, Email: eticaycumplimiento@ingeniopichichi.com**
 - **Conflict of Interest;** We must never put personal interest above our duty to the company. We must not enter into any agreement or do business that directly or indirectly competes with Ingenio. We must not use our position to obtain improper opportunities or benefits, including, but not limited to, gifts, loans, investment opportunities, outside employment, contract opportunities or personal transactions. Employees who consider that they may have a conflict of interest must notify their immediate supervisor and the Compliance Officer on form FR-GG-99 Conflict of Interest Report. Failure to do so will result in a reprimand or appropriate sanctions.
 - **Secure and Confidential Information;** We are responsible for the integrity and veracity of the information we are in charge of, including the records, classification and conservation of the same, according to internal standards and the law; to make decisions we must have complete, clear and accurate information, taken from the respective systems, ensuring that the documents and content are appropriate and legitimate. Confidential information shall be held as private except as when required by law.
 - **Gifts and Hospitality;** According to the Gifts and Hospitality Policy PO-GG-106, we are not permitted to request, accept or demand any gift that may influence (or appear to influence) our ability to make objective decisions that are in the best interests of Ingenio. We must never seek or structure a negotiation based on a gift, service or courtesy from a customer, supplier, consultant, service provider or other third party.
 - **Integral Management;** We have implemented an integral management system to comply with quality, environmental, safety, occupational health and safety, logistic chain and sustainability standards; we must all be aligned to the compliance of these management systems.
8. **Risk Management:** We have implemented a risk management system that seeks to prevent the materialization of threats to strategic objectives and operations. Employees must internalize risk-based thinking in order to maintain organizational ethics and transparency.

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9. Means of Communication: We will communicate with stakeholders in a timely and transparent manner, aligned with the Mission, Vision and Corporate Values. Suitable and confidential means are available to report complaints or clarify concerns, facilitating transparency and ethical behavior. When reporting, you should consider these statements:

- Total confidentiality is guaranteed in the case of complaints.
- When reporting, you must have verifiable information, facts and data.
- It is against the Code of Ethics: false reports, adulterated reports or withholding information.
- In the event of any type of discrimination or mistreatment of the reporting employee, whoever does so will face the corresponding disciplinary measures.
- If you have any doubts, you should contact your supervisor; if you wish to do so anonymously, please contact the following channels: Ethics Line: Tel. 2547201 Ext. 130 - 135 - Mobile 3185915080, Email: eticaycumplimiento@ingeniopichichi.com, or on the suggestion boxes intended for this purpose.
- If the complaint corresponds to labor relations situations, you should go to the labor coexistence committee, or to the suggestion boxes.

10. How to proceed regarding the Code of Ethics: The code will be disclosed on the collaborators through established communication channels and presentations delegated to the Compliance Officer.

- Employees are required to report suspicious or irregular conditions, all reports will be treated confidentially.
- If a suspicious or irregular activity becomes known, the employee is obliged to report it, otherwise he/she will be responsible for the consequences.
- Anyone who, being involved in any irregularity, reports it through the authorized channels; their collaboration will be taken into account when taking disciplinary actions.
- The information will be confidential, involving fair and timely investigations.
- It is a violation of the code of ethics to destroy, alter or hide evidence.
- Employees must facilitate the investigation of irregularities or violations of the rules, if the inquiries define corrective measures; the steps to follow will be indicated, to avoid a repetition. Those involved have the right to be heard.

11. Consequences for Non-Compliance with the Code of Ethics: Failure to comply with it, either intentionally or by omission, is a serious misconduct and will result in sanctions according to the applicable law, including dismissal for just cause under the substantive labor code, Colombian labor laws or internal labor regulations; in addition to possible effects with civil or criminal liability.

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When an employee misses a business opportunity or misses a job performance or, in good faith, reports a suspicious situation, the employee will not suffer any retaliation for such actions, subject to the code.

Executives, Managers, Chiefs, Coordinators or Employees who accept infractions or forgive without acting with integrity and transparency according to the code, will expose themselves to disciplinary measures, rules and laws, which may involve dismissal and/or criminal prosecution. Resulting damages may require reimbursement to Ingenio or to the third parties affected.

12. Change log and document validation

Issuance		Registration	Description
Date	Source	Date	
March 22, 2022	Board of Directors	Record 1261 March 22, 2022	In version 3, structural changes were made, adjusted to the policies and mission values of Ingenio.