



Global Anti-corruption Policy

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OBJECTIVE

The corporation, its subsidiaries and affiliates worldwide maintain and promote the highest level of professional standards and give great importance to their reputation, integrity and ethics. In its operations it promotes compliance with applicable national and international anti-corruption laws and rejects corruption of any kind as well as improper actions by its directors, employees, consultants, agents or representatives. This policy prohibits improper and corrupt payments in all circumstances, whether in contracts with government officials or with individuals in the private sector.

The objective of this policy is to require strict compliance with all relevant anti-corruption laws of the countries in which we operate, including, among others, the Foreign Corrupt Practices Act (FCPA) of the United States and the UK Bribery Act and laws of the country where the corporation or subsidiary of the group operates.

SCOPE

In accordance with its objective, this policy is directed to all people who act on behalf of the corporation, directly or indirectly, in any country where it has operations, including government officials, among others, any civil servant or employee of a Governmental Entity, any civil servant or employee of a political party or a candidate for political office, any civil servant or employee of a public international organization, such as the United Nations, World Bank, International Monetary Fund, among others, or a person (even if ad-honorem) who performs public functions on behalf of a governmental entity or who is temporarily assigned to any Governmental Entity (even if not employed by such governmental entity).

DEFINITION

There is corruption when any person acting on behalf of the corporation, its subsidiaries and affiliates directly or indirectly offers, promises or delivers anything of value to any person, including government officials, including any civil servant or employee of a political party or a candidate for political office, any civil servant or employee of a public international organization, such as the United Nations, World Bank, International Monetary Fund, among others, with the intention of obtaining an improper business advantage.

CONTENTS

Violations



Employees and third parties are required to read and understand this Global Anti-Corruption Policy. Anyone who violates the standards included in this Policy or in the Program Compliance Procedures will be subject to disciplinary measures, which will be determined by the Ethics Committee. If applicable, the person will be referred to the appropriate law enforcement authorities.

Corruption and bribery

Corruption means to offer or receive something of value or a benefit, in order to improperly influence the actions of a third party. Bribery is corrupting someone with money, gifts or favors to obtain something in return.

GLOBAL IMPLEMENTATION OF THE ANTI-CORRUPTION POLICY

To effectively implement this policy, the company will adopt operating procedures aimed at minimizing the risks of corruption that exist in all its operations worldwide. The procedures and management used to implement this policy shall include, at a minimum, the following:

- a. Effective controls over the funds disbursement and other assets to ensure that such disbursements are not made for improper purposes;
- b. Measures to ensure that the accounting books and records faithfully reflect the disposition of assets;
- c. Clearly articulated standards of behavior such as those included in the Code of Ethics, which will be made public in all business operations around the world;
- d. Clearly defined roles, responsibilities and reporting lines for daily management and implementation of compliance procedures;
- e. Effective training of employees and, where applicable, third parties on anti-corruption standards and procedures;
- f. Controls through internal audits or through a third party to verify compliance with anti-corruption procedures that include the review of expenses of operations and farms in which government officials interact;
- g. Annual corruption risk assessments in all operations;
- h. Provide due attention to those third parties who interact with government officials on behalf of the corporation;
- i. Informing or seeking advice on actual or potential anti-corruption issues, as well as procedures for responding to such reports or requests;



- j. Regular reviews and, if necessary, reviews or updates of this Policy and related Procedures, if appropriate, including in response to legal, regulatory or industry changes or violations of this Policy.

OUR POSITION REGARDING CORRUPTION AND BRIBERY

AgroAmerica has no tolerance for any type of fraud, bribery or corruption, which means that any suspected incident of fraud, bribery or corruption will be thoroughly investigated and that any improper behavior may result in disciplinary action against the corporation's employees.

NOTICE IN CASE OF SUSPICIONS

Employees are responsible for reporting any act of corruption as soon as they become aware that such act may have been committed. You may use the means indicated, such as the ethics line or reports channel, to report your concerns and remain anonymous if you wish. If you submit a report, you will be protected from any retaliation according to the organization's policies.