



Conflict of Interest Policy

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OBJECTIVE

To establish standards that regulate and minimize possible conflicts that may arise in the decision-making between employees and the interests of the corporation.

To effectively serve as a guide in order not to lose objectivity in decision-making, to provide specific guidelines, as well as to orient in the implementation of actions to avoid contingencies related to conflict of interest or to correct those circumstances that go against this policy.

SCOPE

This policy is directed to:

- a) Managers;
- b) Supervisors;
- c) Any position within the organization, who due to its functions, has access to information that could lead to a conflict of interest;
- d) Relatives of employees¹ who, in one way or another, have a business or a service relationship with the company, whether by consanguinity, affinity or civil relationship. Consanguinity is taken into account up to the fourth degree, affinity up to the second degree, and a civil relationship up to the first degree.

DEFINITION

A conflict of interest occurs when there are situations in which decision-making, integrity and judgement of the primary interest tend to be influenced by a secondary interest of a financial nature, due to family relationship or any other cause. This may occur if there is a loss of objectivity and independence when making a decision.

AgroAmerica considers conflict of interest in a broad manner, detailing the following:

- Actual conflict of interest: When the employee faces an actual and existing conflict.
- Potential conflict of interest: When the employee is or could be in a situation that may result in a conflict of interest.

¹ Immediate family member: Those who are related by birth, adoption, marriage, cohabitation, dating or civil union, recognized by local laws. This category includes spouses, parents, stepparents, siblings, stepsiblings, children, stepchildren, grandparents, grandchildren, cousins in the first degree, parents-in-law, sons-in-law, daughters-in-law, sisters-in-law, uncles, aunts, nephews and nieces in the first degree.



- Perceived conflict of interest: When the employee is or could be in a situation that may be perceived as conflictive, although in fact it may not be so.

Decisions made under conflict of interest are contrary to the interests of the corporation.

CONTENTS

The benefit of the company, its image, the protection of its assets, information and interests are always a priority. AgroAmerica respects the privacy of its employees and their right to participate in legitimate activities outside the work environment and to develop other professional activities on their own account or on behalf of others, as long as it does not affect their work performance, there is no exclusivity agreement and does not involve a conflict of interest.

Whenever there is knowledge of a conflict of interest in any area of the related companies, it must be reported at all times.

Any case reported under this policy will be treated with strict confidentiality.

Non-compliance with this policy once implemented, concealing information or making decisions under conflict of interest, will be sanctioned to the employee who has concealed it and this will be determined by the Ethics Committee; and the relation with the supplier will be terminated. This means that it will no longer be able to provide goods or services to the corporation.

PROCEDURE ON POTENTIAL CONFLICT OF INTEREST

1. The employee shall inform his or her direct supervisor about the possible conflict of interest detected;
2. The direct supervisor will inform the Compliance Officer or his or her assistants about the situation so that he or she can follow up and submit a resolution to the conflict;
3. Any employee requesting the creation of a supplier file must submit a Statement of potential conflict of interest.

STATEMENT OF POTENTIAL CONFLICT OF INTEREST



Employees must submit the Statement of potential conflict of interest if they request the creation of a supplier file of goods or services for a company that is part of the corporation, in which they will state that they have no financial interest, due to family relationship or any other reason. Otherwise, it shall inform the Compliance Officer so that he or she may study and analyze whether it is feasible to contract that supplier.

THERE IS A CONFLICT OF INTEREST

- When there is pressure to make a decision that may not be in the best interest of the company;
- When the person who must make decisions, may be influenced by a direct or indirect secondary interest, generally of financial nature;
- When the person who must make decisions has some type of relationship (kinship, romantic relationship or friendship) that may affect or influence his or her judgement, for his or her own benefit or that of a third party, and that may be considered detrimental for the company;
- When the performance of functions affects in any way derived from a personal relationship with another employee of the organization.

EXAMPLES OF CONFLICT OF INTEREST

- The employee provides transportation services with his own or his relatives' buses, or has influence to provide the service to family farms, friends, using his position or decision-making power;
- Hiring relatives to work as subordinates;
- Hiring of services and purchase of supplies from own businesses, from relatives, or those in which they have influence.

NOTICE IN CASE OF SUSPICIONS

Employees are responsible for reporting any act of suspected conflict of interest 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.



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