



## **Ethics Line on Complaints and Claims policy**

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**ETHICS LINE ON COMPLAINTS AND CLAIMS POLICY**

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## OBJECTIVE

The objective of this policy is to encourage the reporting of situations that are considered unethical and that may cause harm to the corporation or to others. We recognize the importance of implementing the Ethics Line tool, as an indicator of the corporate commitment to maintain a high standard of ethical and legal behavior at all times.

In addition, we will not tolerate retaliation against individuals who report ethical, labor or legal issues or who participate in the investigation of such reports.

The corporation is committed to follow up on suggestions, claims and compliments submitted by stakeholders (employees, customers, suppliers, communities, among others), in order to propose solutions for each of the issues.

## SCOPE

This policy is directed to:

- a) Executive shareholders;
- b) Employees;
- c) Independent contractors;
- d) Suppliers;
- e) Stakeholders; and
- f) Interest groups.

It concerns anyone who reports a concern as well as those who participate in an investigation as investigators, witnesses or collaborators.

## DEFINITION

**Ethics line:** The ethics line tool was created so that employees, suppliers, customers and stakeholders have a safe way to submit claims, complaints or report confidentially and anonymously, if they wish, any unethical conduct, legal problems and any situation considered as an anomaly.

The modalities for submitting reports will be made available on the corporation's website and through digital media.



## **CONTENTS**

The corporation's employees and other stakeholders can submit their files with confidence and safety. The corporation has an external service to receive your comments, so all information will be treated with confidentiality and discretion.

Although anonymous reporting is permitted, it should be noted that the investigation process will be much more expeditious if contact information is available. This makes it easier to expand on any issue that arise during the investigation of the case.

False or bad faith submission of files is prohibited. Workers who submit a false file may be subject to a disciplinary process.

People who submit files may enclose evidence and documents to facilitate the investigation.

## **REQUESTS, COMPLAINTS, CLAIMS OR SUGGESTIONS FROM OUR STAKEHOLDERS**

Requests, complaints, claims or suggestions submitted by customers, suppliers, communities, local entities, civil society, among others, will be received by the means that the corporation has available for this purpose.

The main objective is to guarantee accessibility for reporting by any interested party and to be able to provide solutions to the stated issues.

## **MEANS OF RECEPTION**

- Ethics line or reports channel;
- Among others that will be disclosed by the official means designated by the corporation.

## **ETHICS LINE OR REPORTS CHANNEL:**

It is aimed at employees, suppliers, customers and stakeholders, who will send their requests, complaints, claims or reports through the telephone numbers provided by the corporation in its website.

Any employee, customer, supplier, community, local entity, civil society, among others, may report or inform any event by contacting the Compliance Officer directly, through suggestion boxes, if any, by means of workplace climate surveys, or by any other means implemented by the corporation.



## REPORTING PROCEDURE

Procedures for the resolution of reports, complaints or claims may be disclosed on the corporation's official website and other digital media.



1. A case is submitted through the mechanisms established for the corporation;
2. The Compliance Officer receives the case;
3. An initial analysis of the file is made and the Compliance Officer decides on the following actions, and may delegate an Assistant to investigate the reports, complaints, claims, among others;
4. The investigation of the file begins. No report is taken lightly, therefore it is very important that the information provided in the case is truthful and substantiated;
5. The Compliance Officer may issue a resolution regarding administrative investigations.
6. In case of reports of anti-corruption, theft or sexual nature, the investigation will be referred to the Ethics Committee.
7. A resolution for this report will be issued.



## REPORTABLE BEHAVIORS

The following are some of the behaviors that may be the object of a report:

- Bribery and corruption;
- Conflict of interest;
- Anti-competitive behavior;
- Anomalous suppliers;
- Fraud;
- Employer misconduct;
- Employee misconduct;
- Violation of privacy and confidentiality;
- Retaliation;
- Sexual harassment;
- Sexual violence;
- Violation of environmental, safety and health regulations;
- Any other anomalous event affecting employees and/or AgroAmerica.

The above mentioned does not constitute a “numerus clausus,” this means, they are merely illustrative and not restrictive, it does not necessarily imply the inclusion of all reportable behaviors; therefore, it does not prevent the corporation from investigating behaviors that have not been included in the previous section.

## DEADLINE TO RESOLVE REPORTS

Any complaint, claim or report will be handled and resolved according to the complexity of the facts that are reported, so the Corporate Management and/or the Compliance Officer may classify them according to their impact, these being minor and major impact.

## FALSE, INCOMPLETE OR IRRELEVANT FILES

The ethics line is a mechanism that provides transparent communication between interested parties and the corporation, we seek to protect rights and promote ethical culture.

People who submit files or reports that are false, malicious or have an ulterior motive, with the intent to cause harm, shall be subject to a severe disciplinary sanction.

Complainants are encouraged to submit a consistent and supported file. Files that are incomplete, unfinished, false or irrelevant may be closed at the discretion of the Compliance Officer.

## **PUBLICIZING REPORTS**

Files on reports, requests, complaints, claims or suggestions submitted by employees, customers, suppliers, communities, local entities, civil society, among others, may be disclosed in the means that the corporation deems appropriate with the prior approval of the person reporting the facts. If not authorized, the information will be confidential.

Statistics of the reports received may be disclosed on AgroAmerica's online platforms, and may indicate the information that the Compliance Officer deems relevant to disclose.

However, information from the report may only be disclosed if the complainant authorizes it. Such authorization will be provided by the complainant at the time of reporting any fact, through the personnel trained to receive reports, who will ask if he or she agrees that any or all of the information provided may be disclosed for informational purposes.

## **NO RETALIATION AGAINST EMPLOYEES**

Retaliation is generally defined as any type of negative action against a current or former employee that takes the form of punishment and creates a hostile, threatening or uncomfortable environment as a result of his or her reporting.

This policy describes the disposition of the corporation towards employees that submit files for harmful, discriminatory and unethical behaviors. The corporation seeks to avoid victimization and other retaliatory behavior towards the employee or employees who submit a report, a file or collaborate in an investigation.

## **GUIDELINES AND GUIDANCE ON NON-RETALIATION**

This policy exists for two reasons:

1. First, when reports have a solid foundation, they must be considered and measures must be taken. Retaliating against an employee who has brought inconsistencies or violations to your attention will damage the reliability and trustworthiness of the program and the institution.
2. Second, any type of retaliatory action, whether intentional or unintentional, may expose the institution to greater risk.

The following is a list of actions that could be considered retaliation against employees:

- Wrongful dismissal;
- Persecution;



- Demotion;
- Transfer to positions of lesser responsibility;
- Unfavorable evaluations;
- Offensive comments;
- Loss of relationships or isolation;
- Separation from a team or project;
- Withholding of funds;
- Removal from delegate faculties;

Acts of retaliation are counterproductive measures in the workplace; they are unjustified and harmful to everyone. Such behaviors are not considered to be in the best interests of the corporation. All reports or files through our channels are protected against all types of retaliation. People who retaliate against any employee who has submitted a file or report will be subject to disciplinary sanctions according to the seriousness of the case.

## **NOTICE IN CASE OF SUSPICIONS**

Employees, like anyone else who is affected, have a responsibility to report any act of retaliation as soon as they become aware that such an 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.