

General Compliance Policies - Business Ethics Program

This document gathers information related to rules and procedures concerning corruption and transnational bribery that the company must adopt to avoid being involved in situations that could jeopardize its commercial reputation. It adapts the Compliance Manual under the parameters of Law 1778 of February 2, 2016, and reiterates the commitment of **REFORESTADORA RIOFRIO SAS** to Business Ethics and social responsibility, which will guide the development of its economic activity, credibility, and trust.

The primary purpose of implementing the Transparency and Business Ethics Program is to prevent and mitigate specific risks related to Transnational Bribery or any other corrupt practice, raising awareness and promoting compliance across the entire business structure under corporate principles and best business practices.

The Transparency and Business Ethics Program of **REFORESTADORA RIOFRIO SAS** is launched with the commitment of senior management, employees, contractors, shareholders, and investors, including all those who establish any commercial, contractual, or cooperative relationship directly or indirectly.

Regarding the risk of Transnational Bribery, senior management sets a **LOW risk appetite**. This means that extreme severity risks must be prioritized for mitigation, followed by high severity risks. The latter, if they have a low probability and the company has already taken measures to mitigate the impact, will be considered **accepted risks**, as Transnational Bribery risks tend to fall into this category.

It is important to remember that risk appetite is the amount of risk an organization is willing to accept to achieve its strategic objectives. Every company incurs inherent risks in its business activities. There is no business without risk or with zero (0) risk. The only way to eliminate risk is by not conducting the activity. Therefore, senior management must establish its **RISK APPETITE** and, based on this, the amount of money it is willing to assume as tolerable.

Commitment of Senior Management in Preventing Transnational Bribery

The Compliance Policies are issued by Senior Management and are responsible for promoting a culture of transparency and integrity, where Transnational Bribery and corruption, in general, are considered unacceptable. Accordingly, employees must follow the example set by Senior Management to collectively build a policy aimed at preventing Transnational Bribery, other corrupt practices, and overall compliance with the law.

Specific Compliance Policies

The company assumes a firm commitment to prevent Transnational Bribery and any other corrupt practice, ensuring that its business operations are conducted ethically, transparently, and honestly.

- Senior management provides the economic, human, and technological resources required by the Compliance Officer to fulfill their duties.
- The company will take appropriate actions against administrators who violate the provisions of the Business Ethics Program.
- The company establishes an effective communication strategy to ensure proper dissemination of the Compliance Policies and the Business Ethics Program among employees, associates, contractors, and the general public.
- The company will carry out an annual review to assess the need to update this document based on risk evaluations and other relevant considerations.

- Contractors with a higher risk exposure to Transnational Bribery must explicitly agree to prevent Transnational Bribery, with such commitments included in their respective contracts. If the contract is not in writing, the contractor's commitment will be recorded in the onboarding form.
- Training is essential to ensure that the Business Ethics Program is properly understood. The company will conduct annual training sessions, and employees are required to attend when invited.
- All employees are obligated to report acts of corruption both internally and externally.