ECOFÉRTIL S.A. adopts and maintains its Corporate Transparency and Business Ethics Program (PTEE) as an essential corporate integrity framework aimed at preventing, detecting, managing, and mitigating the risks associated with Corruption and Transnational Bribery (C/TB) throughout all of its operations.

Accordingly, the Company has established an institutional zero-tolerance policy against any act of corruption, bribery, fraud, facilitation payments, improper commissions, or any conduct that contravenes the Company's corporate values, applicable laws, and international standards of business transparency.

COMMITMENT OF SENIOR MANAGEMENT

The Board of Directors, General Management, and Senior Leadership of ECOFÉRTIL S.A. reaffirm their commitment to promoting an ethical, transparent, and responsible corporate culture by fostering standardized best business practices at every level of the organization.
This commitment is reflected in the implementation of effective controls, reporting mechanisms, due diligence procedures, and disciplinary measures designed to ensure compliance with the Corporate Transparency and Business Ethics Program (PTEE) and safeguard the Company's corporate reputation.

GUIDING PRINCIPLES

This Policy is based on the corporate principles adopted by ECOFÉRTIL S.A., which guide the decisions and actions of its directors, employees, and business partners:

- Honesty, by acting truthfully and sincerely in the conduct of business activities.
- Integrity, by promoting transparent and ethical business relationships.
- Accountability, by assuming responsibility for corporate decisions and conduct.
- Legal Compliance, by ensuring strict adherence to all applicable laws and regulations.
- Transparency, by ensuring traceability and clarity in all business transactions.
- Fairness and Equity, by preventing any discriminatory or improper treatment.

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- Confidentiality, by protecting the Company's sensitive information and that of its stakeholders.
- Respect, by fostering relationships based on dignity and professionalism.
- Loyalty, by acting consistently with the Company's institutional values.
- Social Responsibility and Sustainability, by contributing positively to society while minimizing adverse impacts.
- Ethical Innovation, by encouraging business development within a framework of integrity.

ZERO-TOLERANCE DIRECTIVES

ECOFÉRTIL S.A. expressly prohibits:

- Offering, promising, authorizing, or giving bribes or improper gifts.
- Requesting or accepting undue benefits or advantages.
- Making facilitation payments or unauthorized commissions.
- Engaging in actions intended to improperly influence the decisions of third parties.
- Concealing or tolerating corrupt practices within or outside the organization.

Any conduct that violates this Policy shall be subject to disciplinary and contractual sanctions and, where applicable, shall be reported to the competent authorities.

INTEGRATION WITH SAGRILAFT

The Corporate Transparency and Business Ethics Program (PTEE) is implemented in institutional coordination with the Self-Control and Risk Management System for Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (SAGRILAFT) to ensure consistency in compliance guidelines, due diligence procedures, and internal control measures, in accordance with the directives issued by the Colombian Superintendence of Companies.

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IMPLEMENTATION, REPORTING, AND CONTINUOUS IMPROVEMENT

ECOFÉRTIL S.A. ensures:

- The allocation of adequate resources for the effective operation of the Corporate Transparency and Business Ethics Program (PTEE).
- The availability of confidential, non-retaliatory reporting channels.
- Ongoing training on business ethics and the prevention of Corruption and Transnational Bribery (C/TB).
- The continuous evaluation and updating of the Program in accordance with the Company's risk profile.

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