

1	LEGAL	Development: Legal Department Date: April, 2022.
	TRANSPARENCY AND BUSINESS ETHICS PROGRAM	Revision: Legal Department Date: May, 2022

1. Purpose

The company SUMMIT AGRO COLOMBIA SAS (hereinafter SUMMIT AGRO) is committed to complying with all national and international regulations that govern business transparency and business ethics. Thus, this document contains the business policies that will apply to the entire company, human team and related parties, with whom SUMMIT AGRO establishes some kind of commercial, contractual or similar relationship in order to comply with the Transparency Program. and PTEE Business Ethics.

Therefore, the purpose of the Transparency and Business Ethics Program is to establish the Company's commitment to ethical and transparent behavior, as well as to conduct business in a responsible manner.

2. Objective

Establish guidelines that allow acting with transparency and business ethics. The objective is to present the Policy and Program of Transparency and Business Ethics, which has been defined by the Senior Management of the Company.

3. Scope

The policy applies to all collaborators who carry out operations and transactions on behalf of the Company. Thus, it applies to all related parties and interest groups, understood as clients, suppliers, distributors, contractors, shareholders, investors and in general to all those with whom, directly or indirectly, any commercial, contractual or cooperative relationship is established with SUMMIT. AGRO.

4. Definitions

Shareholder: the natural or legal person who owns the shares of SUMMIT AGRO.

Senior managers: are the natural or legal persons, designated in accordance with the corporate statutes or any other internal provision of the company and Colombian law, as the case may be, to manage and direct the Legal Entity, whether they are members of collegiate bodies or of people individually considered. That is, they are the Administrators and main executives of the company, that is, Manager, Zone Managers, Legal Representatives and Members of the Board of Directors, whether or not linked to it by employment.

Circular externa 100-000003 de la Superintendencia de Sociedades: it is the guide intended to implement business ethics programs for the prevention of the conduct provided for in article 2 of Law 1778 of 2016. Issued by the Superintendency of Companies.

Conflict of interest: situation where the business due to financial, family, political relationships or personal interests can influence the judgment of people in fulfilling their functions within the organization.

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Due diligence: is the initial and periodic review that must be carried out on the legal, accounting and financial aspects related to a national or international business or transaction, the purpose of which is to identify and evaluate the risks of bribery and corruption that may affect the company, its subordinate companies and contractors.

Compliance officer: natural person designated by SUMMIT AGRO to promote, develop and ensure compliance with the specific prevention and compliance procedures of the transparency and business ethics program.

Facilitation payments: payments made to government officials in order to ensure, promote or accelerate legal and routine procedures for the benefit of the company or its employees.

Principles: are the principles that are intended to implement risk management systems for Transnational Bribery and other acts and conduct that are considered illicit because they lack legitimacy and transparency.

Business Ethics Program: are the specific procedures in charge of the Compliance Officer, aimed at putting compliance policies into operation, in order to identify, detect, prevent, manage and mitigate the risks of Transnational Bribery, as well as others that are relate to any act of corruption that may affect the company.

Transparency and Business Ethics Program or PTEE: is the document that includes the Compliance Policy, the specific procedures in charge of the Compliance Officer, aimed at putting the Compliance Policy into operation, in order to identify, detect, prevent, manage and mitigate Corruption Risks or Transnational Bribery Risks that may affect a Supervised Entity, in accordance with the Risk Matrix.

Foreign Public Servant: has the scope provided for in the First Paragraph of the second article of Law 1778. “Any person who has a legislative, administrative or judicial position in a State, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of if the individual has been appointed or elected. A foreign public servant is also considered any person who exercises a public function for a State, its political subdivisions or local authorities, or in a foreign jurisdiction, whether within a public body, or a State company or an entity whose decision-making power is subject to the will of the State, its political subdivisions or local authorities, or a foreign jurisdiction. It will also be understood that any official or agent of an international public organization holds the aforementioned quality.”

Bribery: is giving, offering, promising, requesting or receiving any gift or thing of value in exchange for a benefit or any other consideration, or in exchange for performing or omitting an act inherent to a public or private function for one's own benefit or that of a third party.

Transnational bribery: is the act by virtue of which the Company, through its employees, senior managers, associates, contractors or subordinate companies, gives, offers or promises to a foreign public servant, directly or indirectly: (i) sums of money, (u) objects of pecuniary value

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or (iii) any benefit or utility in exchange for said public servant performing, omitting or delaying any act related to their functions and in relation to an international business or transaction.

Subordinated Company: It has the scope provided for in article 260 of the Commercial Code.

5. Legal Frame

a. International norms

Palermo Convention of 2000: United Nations Convention Against Organized Crime (Approved by Law 800 of 2003 – Sentence C-962 of 2003).

Mérida Convention of 2003: United Nations Convention Against Corruption (Approved by Law 970 of 2005 – Sentence C – 172 of 2006).

The United Nations Convention against Corruption (UNCAC): It is the only universal anti-corruption instrument legally binding on states, thanks to its approach and the mandatory nature of many of its provisions, it is a useful tool to provide a comprehensive response to this problem.

The convention to combat international bribery: In relation to the increase in transnational crime and corruption in the era of globalization, the member countries of the Organization for Economic Cooperation and Development (OECD) ratified in 1997, this convention, which deals with Bribery of Foreign Public Officials in Transnational Business Transactions. This convention is ratified by law 1573 of 2012 by the Colombian government.

Inter-American Convention to Fight Corruption CICC: Signed in 1996, it was created in the Organization of the United States (OAS). In Colombia, it was ratified with the approval of Law 412 of 1997, giving way to the organization of preventive measures, such as the commitment that public collaborators must have, transparent and public state contracting systems, protection systems for whistleblowers. , the driving mechanisms of citizen participation, among others.

b. Local norms

Political Constitution: Articles 6; 123; 333 paragraph 5 and article 335.

Law 365 of 1997: By which norms are established to combat organized crime and other provisions are dictated.

Law 599 of 2000: Through which the Penal Code is issued and the crimes in which money laundering originates are classified and provisions are issued for the prevention, detection, investigation and punishment of the financing of terrorism.

Law 600 of 2000: Through which the Colombian Penal Code is issued in crimes against the social economic order.

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Law 1121 of December 29, 2006: Law through which regulations are issued for the prevention, detection, investigation and sanction of the financing of terrorism.

Decree 1674 of 2016: by which a chapter is added to Title 4 of Part 1 of Book 2 of 1081 of 2015, "by which the Single Regulatory Decree of the Presidential Sector or the Republic is issued."

Decree 1068 of 2015: Article 2.14.2 (report of Suspicious Operations to the UIAF, in accordance with literal d) of numeral 2 of article 102 and articles 103 and 104 of the Organic Statute of the Financial System.

Law 1474 of 2011: By means of which the Colombian Anti-Corruption Statute is established, where the rules are established aimed at strengthening the protection, investigation and sanction mechanisms for corrupt acts and the effectiveness of public management.

Law 1778 2016: By which the Anti-Bribery Law is established.

Resolution 100-002657 of June 25, 2016 of the Superintendency of Companies: By which rules are established on the responsibility of legal entities in transnational corruption and other provisions on corruption are dictated.

External Circulars: 100 – 000005 of 2014, 100 – 000001 of 2017, 100 – 000016 of 2020 and Circular 170 of 2002 of the Superintendency of Companies.

6. Sanctions

Sanctioning regime: In accordance with the provisions of article 5 of Law 1778 of 2016, the Superintendency of Companies will impose one or more sanctions on legal entities that engage in the conduct set forth in article 2 of the aforementioned law. The imposition of sanctions will be carried out through a reasoned resolution, in accordance with the graduation criteria provided for in said law. The sanctions may be fines of up to two hundred thousand (200,000) Current Legal Minimum Monthly Wages.

Criterion for grading sanctions: In accordance with article 7 of the aforementioned Law, sanctions will be imposed by the Control Entity, according to the economic benefit obtained or intended by the offender with the conduct, whether greater or lesser. financial capacity of the offender, repetition of conduct; resistance, refusal or obstruction to investigative or supervisory action and conduct, among others.

Criminal Legislation: Transnational Bribery is classified as a crime in the Colombian Penal Code, in its article 433, generating imprisonment, disqualifications and economic sanctions.

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The representatives of the Company, Directors, Associates, Collaborators and especially the Compliance Officer declare that they are aware of the administrative and criminal provisions and sanctions for non-compliance with the instructions given by the Superintendency of Companies, in matters of Transparency and Business Ethics, in accordance with the conduct provided for in Art. 2 of Law 1778 of 2016.

7. Principles and statements:

- **Principle of legality:** All people linked to the Company are committed to ensuring compliance not only with the letter but with the spirit of the Constitution and Colombian laws, as well as the provisions and regulations issued by the authorities and the rules and regulations. policies set by the Company.
- **Principle of honesty:** To the extent that all workers are aware of their responsibilities and their moral, legal and labor obligations and practice them, it can be stated that they are fulfilling their duties towards the community, the company and the country and the only way to do it is by following the path of an honest, transparent and legitimate business. Those with a higher hierarchical level and responsibility for the Company's assets and processes must be more committed to pro-life behavior.
- **Principle of good faith:** Act with good faith, with diligence and care, permanently ensuring respect for people and compliance with the law and giving priority in their decisions to the principles and values of the Company over individual interests.
- **Principle of loyalty:** Out of loyalty to the Company, every person must promptly communicate to his or her immediate superiors any fact or irregularity committed by another official or a third party that affects or may harm the interests of the Company, its clients, shareholders and directors. If the employee prefers to keep their identification confidential to communicate this fact, they can do so through the Transparency Line.
- **Principle of general and corporate interest:** All actions must always be governed by the general interest and management at all levels must be devoid of any personal economic interest. Transparent conduct is exempt from payments or acknowledgments to obtain or retain business or achieve a business advantage.
- **Principle of truthfulness:** We tell and accept the truth above any consideration. The information we provide to the general public is true.

In accordance with the above, any person linked to the Company by any means is jointly responsible for the adequate and correct application of the Transparency and Business Ethics Program.

For this reason, the Company's directors value and recognize the effort and commitment of those people who act with righteousness and ensure the integrity of business management.

The Company, embracing good practices, adopts the implementation of systems, procedures, protocols and control and reporting mechanisms, through the Transparency Line, among others, in order to ensure the prevention, identification and treatment of acts and behaviors that occur. considered illegal because they lack legitimacy and transparency.

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The Company prohibits any type of bribery or act of corruption, and requires compliance with all anti-corruption and anti-bribery regulations including External Circular 100-000003 of 2016 of the Superintendence of Companies.

It is imperative to put the observance of ethical principles and values before achieving the Company's goals, considering that it is essential to generate a culture aimed at applying and enforcing the policies that make up the Governance System, corporate compliance and business ethics.

People linked to the Company must know and comply with all the policies and procedures that make up the Governance System, corporate compliance and business ethics.

Employees who have the power to make national or international purchases or negotiations must carry out due diligence to adequately know the third parties, and in particular, the relationship with government entities or public servants before closing the purchase or negotiation. To do this, they must apply the provisions of the Self-Control and Risk Management System for Money Laundering and Terrorist Financing, the guide for contracting with public or state entities at the national and international level, the Purchasing Manual and other Company policies.

8. Modalities against transparency, integrity and business ethics

For the purposes of the program to ensure transparency and integrity in the Company, it must be understood that bribery and corruption in general is the willingness to act dishonestly in exchange for money or personal benefits, causing damage by unfairly favoring a few who abuse their power. or your position. This not only creates unfair competition but also limits the path to organizational efficiency and people's integrity.

To facilitate understanding, the following modalities are considered to go against the Transparency and Business Ethics Program:

8.2. Conflict of interest:

A conflict of interest is understood when:

- There are conflicting interests between a worker and the interests of the Company, which can lead the worker to make decisions or carry out acts that benefit themselves or third parties and are detrimental to the interests of the Company.
- When there is any circumstance that may detract from the independence, equity or objectivity of the actions of any Company employee, and this may be detrimental to the Company's interests.

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8.3. Bribery:

Bribery can be described as the giving or receiving by a person something of value (usually money, gifts, loans, rewards, favors, commissions, or entertainment), as an inappropriate inducement or reward for obtaining business, or otherwise. benefit. Bribery can take place in the public sector (for example, bribing a national or foreign public official or servant) or in the private sector (for example, bribing an employee of a customer or supplier). Bribes and kickbacks may, therefore, include, but are not limited to:

- Excessive or inappropriate gifts and entertainment, hospitality, travel and accommodation expenses.
- Payments, whether by employees or business partners, such as agents, facilitators or consultants.
- Other “favors” provided to public officials or servants, clients or suppliers, such as contracting with a company owned by a family member of the public official, client or supplier.
- The use without compensation of the Company's services, facilities or property.

8.4. Corruption:

It is any act, attempt or deliberate omission to obtain a benefit for oneself or for third parties to the detriment of organizational principles, regardless of the financial effects on the companies. These are actions that are presented under one of two modalities:

- Internal: Acceptance of bribes from third parties to Company workers, so that their decisions, actions or omissions benefit that third party.
- Corporate: acceptance of bribes from Company employees to government officials or third parties, directly or through agents; in order that the third party's decisions, actions or omissions benefit the Company, or an employee of it.

8.5. Fraud:

It is understood as the intentional act or omission designed to deceive others, carried out by one or more people with the purpose of appropriating, taking advantage of or taking possession of another's property - whether material or intangible - in an improper manner, to the detriment of another and generally due to the lack of knowledge or malice of the affected person.

Based on the above, it is especially considered that the following behaviors go against transparency and corporate integrity:

- Intentional acts that seek one's own benefit or that of third parties (material or immaterial) above the interests of the Company.

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- Alteration of Company information and documents to obtain a particular benefit.
- Generation of reports based on false or inaccurate information.
- Improper use of internal or confidential information (Intellectual Property, Privileged Information, etc.).
- Deliberate conduct in contracting and bidding processes in order to obtain gifts (payments or gifts to third parties, receiving payments or gifts from third parties, etc.).
- Destruction or concealment of information, records or assets.
- Give the appearance of legality to resources generated from illegal activities.
- Allocate resources for financing terrorism.
- Improper use of assets owned by the Company that are in its custody.
- Computer fraud.
- Any irregularity similar or related to the events described above.

9. Policies

The policies listed below regulate, among others, the following events:

- Delivery and offering of gifts or benefits to third parties;
- Remunerations and payment of commissions to Employees, Associates and Contractors.
- Expenses of the Obligated Entity related to entertainment, food, lodging and travel activities;
- Political contributions of any nature and;
- The others that are mentioned in section 5.1.1.1. of the basic legal circular 100 – 00011 of 2021.

9.1 Conflict of interest policy

The company will not carry out transactions or businesses that could put it at risk of corruption or bribery. Likewise, the omission of procedures and control measures related to risks of corruption and bribery will not be permitted.

When a person in the company is in a conflict of interest, they must report it directly to the Compliance Officer. In the event in which the person in conflict of interest is the Compliance Officer, he must remove himself from the situation and delegate his functions that are related to the matter in conflict of interest to the Alternate Compliance Officer. For its part, if it is a

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third party who notices the conflict of interest of the Compliance Officer, it must be communicated to the Board of Directors, so that it can designate a person to carry out its functions.

9.2 Program to ensure transparency, integrity and business ethics PTEE.

Being consistent with the principles of transparency and integrity of the Company, the corporate program is implemented to ensure transparent and legitimate acts, which aims, first of all, to promote and ensure within the Company the performance of conduct and acts adjusted to legal and internal standards and good customs, secondly the regulation of the mechanisms and procedures for the prevention of acts that go against this program and thirdly the establishment of due process in order to identify and establish responsibilities of people involved in non-transparent acts.

The program has the following elements:

INTEGRATE and **COORDINATE** the set of actions necessary to prevent and control potential situations of fraud, bribery and corruption.

GENERATE an environment of transparency, integrating the different systems developed for the prevention and detection of actions contrary to the Law and internal regulations, maintaining adequate channels to promote the communication of such matters in the Company.

PROMOTE an organizational culture based on the principle of legality and transparency and on the application of the elementary principles of ethics and responsible behavior of the Company's human team, regardless of their hierarchical level.

IDENTIFY, DEVELOP and **IMPLEMENT** appropriate procedures for the prevention, detection and treatment of conduct not in accordance with the legal system in the Company, promoting its continuous improvement. The identification and evaluation of risks must be carried out following the methodology and risk policy defined by the Company.

GUARANTEE due process to manage, on the basis of respect for the dignity of the person and their rights, the investigation of any alleged fraudulent act, bribery or corruption, ensuring confidentiality in the handling of information and the proportionality of the corrective actions. People who report a violation of the Transparency and Business Ethics Program in good faith are protected against any type of retaliation.

PROMOTE the duty of loyalty of workers by responsibly reporting any suspicion of fraud of which they are aware.

9.3 Policy for entering new markets: Before entering new markets, SUMMIT AGRO will identify the possible risks associated with corruption and define the relevant controls and measures for its prevention and mitigation.

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9.4 Policy on the conservation and management of System documentation: SUMMIT AGRO will keep the documents and records related to the System for a period of ten years counted from the last document or receipt. At the end of this term, the documents can be destroyed, as long as the following conditions are met:

That there is no request for their delivery made by a competent authority.

That they be preserved in a technical medium that guarantees their subsequent exact reproduction and the preservation of their evidentiary value, in accordance with the provisions of Decrees numbers 2620 of 1993 and in article 12 of Law 527 of 1999 and other regulations that modify them, complement or add.

9.5. Disclosure and training policy

Training is essential to ensure that the PTEE is adequately understood by the people obliged to comply with it, for this reason, SUMMIT AGRO will disseminate the PTEE Transparency and Business Ethics Program through the public dissemination mechanisms implemented by the company.

Likewise, SUMMIT AGRO will provide training to those employees, associates and in general, to all interested parties that it considers should be aware of the PTEE, which will be done in a manner and frequency that the company determines with the purpose of ensuring its adequate compliance. As a result of this disclosure and training, all interested parties should be able to identify risks.

9.6. Consequences policy for non-compliance with the Business Ethics and Transparency Program

Any serious breach in relation to the policies and/or procedures established in this Manual, whether intentional or caused by carelessness or negligence of any employee or contractor of SUMMIT AGRO, will be sanctioned in accordance with the contractual commitments, the Labor Law, the internal work regulations contained in annex E06_WR_MO and the procedure for disciplinary actions without prejudice to the civil, administrative and criminal consequences that such conduct may entail.

9.7. Policy for incentives and gifts from third parties

The SUMMIT AGRO internal Procedure established in annex E19_WR_CL will be followed.

9.8. Expense Policy for Intangible Assets, Leases, operations, maintenance, office equipment, purchase, sale, operation of real estate and personal property, company cars, charitable contributions and individual and corporate memberships.

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The SUMMIT AGRO internal Procedure established in annex F01_GA_GR will be followed.

9.9. Entertainment Expense Policy

The SUMMIT AGRO internal Procedure established in annex F02_GA_GR will be followed.

9.10. Expense policy for internal meetings and meals

The SUMMIT AGRO internal Procedure established in annex F03_GA_GR will be followed.

9.11. Fixed Asset Management Policy

The SUMMIT AGRO internal Procedure established in annex F05_GA_GR will be followed.

9.12. Quick Report and Immediate Report Policy

The SUMMIT AGRO internal procedure established in annexes F07_GA_GR and immediate reporting guidelines will be followed.

9.13. Anti-Corruption Policy on Contractors

The SUMMIT AGRO internal Procedure established in annex H05_LG_GR, the list of supplier category exceptions contained in annex H05_LG_06 and the Anti-Corruption and contractors checklist contained in annex H06_LG_GR will be followed.

9.14. Export Security Control Policy

The SUMMIT AGRO internal Procedure established in annex H07_LG_GR and the administrative procedures for the Security Control of exports, contained in annex H08_LG_GR, will be followed.

9.15. Customer Refund Policy

The SUMMIT AGRO internal Procedure established in annex M10_BO_CL will be followed.

10. Mecanismos para reportar

In order to have prevention and broad compliance with the transparency and business ethics program which all collaborators regardless of their position and other interest groups must apply, it is necessary that Summit Agro has hotlines so that all conducts that threaten transparency and the corresponding processes are initiated. Likewise, if a report is made through any other channel, it will be attended to in the same manner and as soon as possible.

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11. Roles and responsibilities

- **The Company's Senior Management:** is responsible for the administration, prevention and detection of the risk of fraud, bribery or other conduct that affects transparency. This includes all people who have the status of bosses and supervisors. In addition, they must promote by example a culture of transparency and integrity in which bribery, corruption and any other inappropriate act is considered unacceptable.
- **The Board of Directors:** is responsible for appointing the Compliance Officer and providing the economic, human and technological resources that CCO requires. Define and approve policies and mechanisms for the prevention of bribery and other corrupt practices within the Company. Order the pertinent actions against senior managers when they violate the provisions of the Transparency and Business Ethics Program and review the reports presented by the Ethics Officer, leaving express records in the respective minutes.
- **Transparency and Integrity Committee:** It is the governing body of the Transparency and Business Ethics Program, its responsibility is to ensure the correct application of the program and the implementation of the necessary corrective measures to guarantee management in accordance with the principles of the policy.
- **Audit and Risk Management is the one who assumes the role of Ethics Officer.** Responsible for the implementation and articulation of the transparency and business ethics program and is responsible for executing the entire logistical investigation operation and due process. Coordinates and documents investigative processes. It must report to the Presidency and the Transparency and Integrity Committee, at least every three months, the reports on its management, the cases received and the recommended strategies for the investigation. You must evaluate the risks of bribery and corruption, coordinate employee training on the material and propose process improvements.
- **Human Team:** All Company workers must ensure transparent management in their respective areas and in the Company in general.

Any worker who has knowledge of any of the modalities of this document must report it immediately through the means established by the company.

If it is through the direct manager, it must be reported it within 24 hours to the Audit and Risk Department.

In these cases, the worker enjoys the following guarantees.

Confidentiality about information and people.

Presumption of good faith. When a person reports conduct, they must do so responsibly; it is presumed that they do so in good faith and based on real evidence or elements.

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12. Correctives actions

In all matters related to workers linked to the Company, proceeding must be carried out in accordance with the legal regulations and the procedure established here.

Any failure to comply with this Transparency and Business Ethics Program will be considered a serious violation of the internal work regulations.

Likewise, if the violation is evident on the part of a supplier or client, the actions established in the Law will proceed with the consequent separation of the contractual and commercial relationship with it.

13. Complaint channels

If you need to make a report regarding misconduct, bribery, corruption, fraud, or require attention from the company's compliance officer, you can use the following channels:

- sacl@summit-agro.com
- a.bohorquez@pardobohorquez.com.co

Control de cambios		
Fecha	Observación	Funcionario
1/06/2022	Creación del documento	Oficial de cumplimiento
30/04/2023	Actualización	Oficial de cumplimiento