



## CODE OF ETHICS AND CONDUCT

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VERSIÓN	02
FECHA	16/01/2026
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## 1. OBJETIVE

To establish the ethical principles and standards of conduct that guide the behavior of all employees, managers, and third parties associated with the organization, in order to promote a culture of integrity, transparency, respect, and responsibility.

This Code seeks to strengthen the trust of stakeholders and ensure that all actions are aligned with institutional values, applicable laws, and the commitments assumed by the organization.

## 2. SCOPE

This Code of Ethics applies to all employees, contractors, suppliers, partners, managers, and any other individuals acting on behalf of or representing **COLSUGAR S.A.S.**, regardless of hierarchical level.

## 3. DEFINITIONS

- **Inclusive work environment:** A workplace that promotes equity, diversity, and participation for all individuals regardless of their personal or professional characteristics.
- **Workplace well-being:** A set of conditions that support balance between personal and professional life, physical and emotional health, and employee satisfaction in the work environment.
- **Code of Ethics:** A set of principles, values, rules, and conduct criteria that guide the ethical and professional behavior of all members of the organization.
- **Employee:** A person who provides services to COLSUGAR S.A.S. as an employee, whether permanently, temporarily, or under contract.
- **Confidentiality:** The obligation to protect and not disclose privileged, personal, commercial, or technical information accessed due to one's role or relationship with the company.
- **Conflict of interest:** A situation in which personal, family, or financial interests may influence, or appear to influence, decisions made on behalf of the company.
- **Discrimination:** Any action or behavior that creates unjust or exclusionary treatment toward a person or group based on gender, race, religion, age, sexual orientation, physical condition, ideology, or other personal characteristics.
- **Confidential information:** Data, documents, strategies, or any type of content that must remain restricted due to its nature and be used only for authorized work purposes.



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- **Integrity:** Acting consistently with ethical and moral values, even when not being supervised. It implies honesty, transparency, and respect for rules.
- **Transparency:** The willingness to communicate actions, decisions, or processes clearly, truthfully, and completely both internally and externally.

#### 4. CORPORATE VALUES

The following values guide all business and employment relationships at **Colsugar S.A.S.**:

- **Passion:** At Colsugar S.A.S. we act with enthusiasm, dedication, and energy in every activity, always striving for excellence, overcoming challenges with a positive attitude and a sense of purpose.
- **Responsibility:** Represents each employee's firm commitment to their duties, decisions, and consequences, always acting with integrity, compliance, and awareness of the impact of their actions.
- **Collaboration** Represents the active willingness to work together, share knowledge, support others, and build collective solutions with respect, empathy, and a common purpose.
- **Teamwork:** We believe the best results are achieved through teamwork characterized by openness to new ideas, a spirit of service, respect, and collaborative learning in an environment of trust.
- **Creativity:** The ability to generate new ideas, propose innovative solutions, and improve processes through creative thinking, adding value to the organization and adapting to environmental changes.

#### 5. ETHICAL AND CONDUCT PRINCIPLES

- Business practices are based on respect, ethics, and compliance with legal regulations.
- The quality of our products and services is focused on meeting customer needs and expectations.
- A culture of environmental care and preservation is maintained in all our activities. Waste generated from production processes is managed according to environmental protection standards.



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- Interactions with all individuals are based on respect and non-discrimination regardless of race, age, gender, or organizational responsibility level.
- All our actions are based on honesty and integrity.
- Information generated within COLSUGAR S.A.S. processes must comply with legal requirements and generally accepted accounting practices, ensuring accuracy, consistency, and transparency in financial reporting.
- Reject any form of corruption, bribery, extortion, or improper business practices in all business relationships.
- Avoid any type of fraud, misappropriation, or misuse of organizational funds.
- Ensure transparency in the management of financial resources through clear and accurate accountability.

## 6. EMPLOYEE CONDUCT GUIDELINES

### 6.1. STAFF SELECTION

During the recruitment process, we ensure objective evaluation based on skills and competencies aligned with job requirements.

We fully respect principles of fairness, inclusion, and diversity, requesting only the information strictly necessary to validate the candidate's qualifications.

All information provided is treated confidentially, protecting privacy and respecting personal beliefs and ideas.

### 6.2. ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP

At Colsugar S.A.S., all employment relationships are formalized through contracts that comply with current legislation.

We reject any form of employment that does not comply with legal requirements.

At the beginning of employment, we ensure that every new employee receives accurate, transparent, and detailed information regarding employment conditions, job responsibilities, and role expectations.



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### 6.3. HUMAN TALENT DEVELOPMENT AND CONTINUOUS LEARNING

Colsugar S.A.S. recognizes human talent as one of its most valuable assets and promotes the comprehensive development of employees by strengthening their skills and competencies.

We foster a culture of continuous learning based on constructive feedback and ongoing support.

Training opportunities are promoted according to each individual's interests, capabilities, and professional goals.

### 6.4. INCLUSIVE WORK ENVIRONMENT

We promote an inclusive workplace where all individuals have the necessary conditions to grow and contribute to their fullest potential.

Workspaces are designed to support well-being, productivity, and effective performance.

Information, documentation, and communications are made accessible according to each role's responsibilities.

### 6.5. WELL-BEING

Colsugar S.A.S. values work-life balance as a fundamental pillar for the integral development of our employees and promotes measures that allow employees to effectively enjoy their rest time.

### 6.6. INDIVIDUAL RESPONSIBILITY

Each team member is expected to act with integrity, respecting both their contractual obligations and the provisions of this Code of Ethics.

Employees must report any conduct that may violate internal regulations to their area leader or immediate supervisor.

No employee is authorized to use the name of COLSUGAR S.A.S. to obtain personal or family benefits or to conduct personal business activities.



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### 7. CUSTOMER CONDUCT GUIDELINES

#### 7.1. COMMUNICATION

Colsugar S.A.S. ensures that all communications with customers are clear, complete, and focused on building trust.

We provide accurate information so customers can make informed decisions.

We reject misleading advertising practices or undue pressure on customers.

#### 7.2. FAIRNESS AND IMPARTIALITY

We are committed to providing fair, respectful, and impartial treatment to all customers.

We reject any form of discrimination and promote inclusion in every interaction.

All customers receive the same level of service quality and consideration.

#### 7.3. QUALITY OF PRODUCTS AND SERVICES

We offer products and services that meet high-quality standards and customer expectations regarding capacity, functionality, durability, comfort, and style.

Customer feedback is valued and used as a key tool for continuous improvement.

#### 7.4. CONFLICT OF INTEREST

Offering gifts, incentives, or benefits to influence business decisions is strictly prohibited.

It is also prohibited to obtain confidential competitor information through improper means.

### 7. SUPPLIER CONDUCT GUIDELINES

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#### 8.1. SUPPLIER SELECTION

Suppliers are selected based on delivery times, price, and brand.

We value partnerships that share our commitment to excellence and ethical business practices.



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### 8.2. INTEGRITY AND INDEPENDENCE

We promote supplier relationships based on integrity, transparency, and independence.

All commercial relationships must follow ethical principles and avoid conflicts of interest.

### 8.3. CONFIDENTIALITY

All information exchanged with suppliers must be treated confidentially and used exclusively for purposes related to the commercial relationship.

### 8.4. CONFLICT OF INTEREST

Under no circumstances may employees accept economic benefits or advantages from suppliers.

Supplier selection must be based solely on fair competition and commercial conditions.

## 9. OF COLSUGAR S.A.S. RESOURCES

Company resources, including materials and financial assets, must be used exclusively for company purposes.

They may not be used for personal benefit or for third parties unrelated to company operations.

Company information must be handled under strict confidentiality rules.

After the termination of a contractual relationship, individuals must continue to respect the confidentiality of information accessed during their relationship with the company.

Unauthorized use of information may result in legal actions according to Colombian law.

The Habeas Data Law must be strictly followed to protect information entrusted by employees, customers, and suppliers.

IT resources such as email, internet access, and computers must be used exclusively for company processes.

The IT department is responsible for implementing information security measures, including backup management and access control.

Only properly licensed software may be used within the organization.

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Employees must use company equipment and resources responsibly and efficiently.

#### **10. POLICY UPDATE, COMMUNICATION AND IMPLEMENTATION**

The Human Resources Department is responsible for maintaining this policy updated and ensuring its communication to all individuals who join COLSUGAR S.A.S.

Each employee will receive a digital or printed copy of the Code.

Any violation of this policy must be reported to Human Resources or company management for evaluation and possible disciplinary action.

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**JOSE ANGEL MARIN HERNANDEZ**  
**(ALTERNATE LEGAL REPRESENTATIVE)**