

# CODE

OF GOVERNMENT  
AND BUSINESS ETHICS



GreenLand

[www.greenland.co](http://www.greenland.co)

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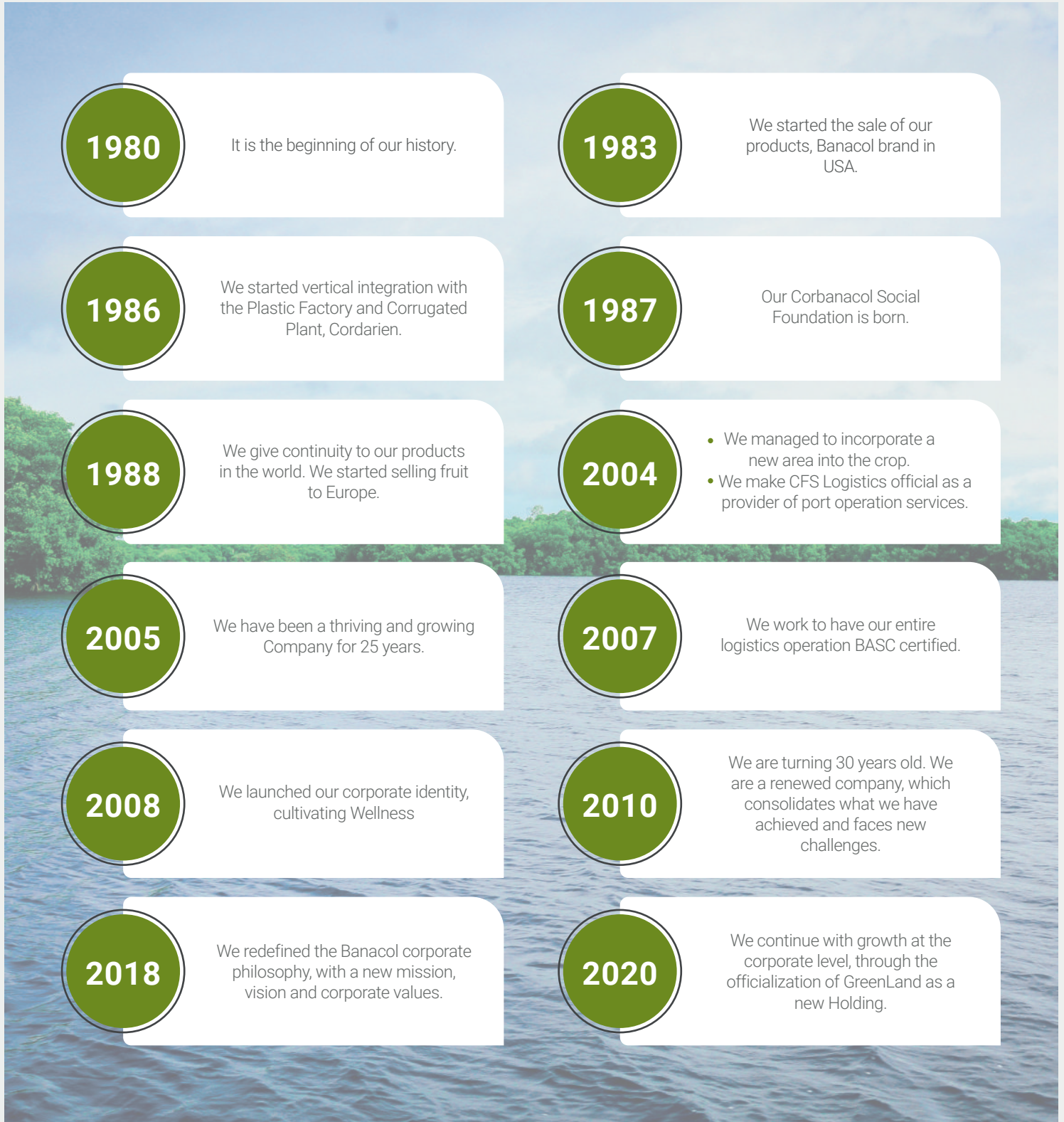
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## CONTEXT

### 1.1 History of the GreenLand Group



GreenLand is an agro-industrial group committed to the development of the countryside, serving **the banana business, led by the commercialization company Banacol**, the banana-producing companies and other commercial units such as the Plastics Factory, the aerial spraying with Control B, the store of agro-industrial inputs Agrocentro, the cardboard factory Corrugados del Darién and the new Frubatec industrial plant; the logistics business represented in CFS Logistics and **the Hass avocado business, with Wakate**.

Through GreenLand we direct all businesses to achieve comprehensiveness, based on operational excellence and aiming to provide solutions to the needs of our clients. We will maintain our essence and our organizational culture, reaffirming our agro-industrial vocation, the unwavering commitment to the Colombian countryside and the development of the communities that work in it. Environmental and social sustainability are fundamental pillars in our activity, to continue contributing to the regions where we develop our operations.

## 1.2 Company Information

### Mission

- We are farmers and we offer solutions to satisfy our customers.
- We passionately seek excellence and sustainability.
- We cultivate wellbeing for our families and the communities where we interact.
- We build close relationships.

We are the  
**GreenLand**  
family

### Vision

To be recognized as an agribusiness group that generates value for its customers and shareholders in a reliable and sustainable way and that cultivates wellbeing for their families and communities.

## Chapter 3.

## Values



**We are accountable.**



**We make things happen.**



**We are transparent, resilient and close.**



**We work with passion.**

## Strategic pillars

- Financial strengthening with generation of surpluses.
- Operational excellence with consistent execution.
- The best people in the best place to work.
- Fulfillment of a differential and adequate value proposition.
- Business growth and projection.
- Strengthening our social and environmental responsibility.



### 1.3 Objective

The objective of the Corporate Governance Code is to structure and bring together the policies, standards and ethical principles that should guide the actions of each of the people related to the Organization, in order to preserve business integrity and maintain transparent relationships with the different stakeholders.

### 1.4 Scope

This document defines the framework of action for the adequate administration and control of the Organization and its relations with the different stakeholders. The provisions of the Code must be complemented by the provisions of the internal standards and policies defined by the GreenLand Business Group.

The Organization will promote the adoption and continuous improvement of Corporate Governance practices among the different businesses that make up the Business Group, in accordance with the policies established in the Code and the applicable regulations in the different jurisdictions in which the companies carry out their business activities.

## Chapter 2.

# GOVERNMENT STRUCTURE

In the GreenLand Business Group we have a leadership focused on guiding the Organization towards good management practices, Operational Excellence and product quality throughout its value chain, while carrying out a constant search for the wellbeing of those who make it up. From three levels of government and decision, we plan, define, execute and monitor the strategic objectives in the short, medium and long term.

### 2.1 General Shareholders Assembly

It is our highest instance of Corporate Governance, its function is to direct and decide on matters of greatest importance to the Organization.

### 2.2 Board of Directors

Appointed by the Shareholders' Meeting, it is the highest administrative body of the Organization, which has, among other functions, the approval and supervision of the implementation by senior management of the strategic objectives, the governance structure and the corporate culture. In addition, it defines the sustainability parameters that are implemented and the risks are evaluated and monitored in the context of the strategic and operational objectives, proposing corrective actions according to the defined tolerable level, carrying out periodic monitoring of said actions.

### 2.3 Committees of the Board of Directors

#### Sustainability Committee:

Sensitizes the Company to guide it to be sustainable and enduring in a responsible manner, under the three pillars of sustainability: economic, social and environmental; in addition, it contributes to the competitiveness and reputation of the Company, compared to other organizations.

#### Audit and Financial Committee:

Its objective is to support the Board of Directors of the GreenLand Group in reviewing: The integrity of the Company's financial statements, compliance with the legal and regulatory requirements applicable to the Group, the qualification and independence of the external auditors, compliance with the procedures internal audit and risk management, as well as the effectiveness of the internal control system from the objectives and strategies established by the GreenLand Group, promoting continuous improvement and compliance with policies and procedures.

### 2.4 Executive Direction

It is the administrative body responsible for the execution of the strategy, the fulfillment of the proposed objectives and the direct relationship with the stakeholders, made up of the following:

- Chairmanship.
- Fruit and vegetable commercialization management.
- Banana Production Management.
- Avocado Production Management.
- Avocado Agriculture Management.
- CFS Logistics Management.
- Control B Operations Management
- GreenLand Foundation Management.
- Legal Management.
- Administrative Management.
- Commercial Management.
- Comptroller and Audit Management.
- Financial and Project Management.

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## 2.5 Internal Committee

### **Strategic Committee:**

Its mission is to project the Company, guiding it to achieve its purpose and ensuring its long-term continuity.

### **Translational Bribery, Fraud, and Corruption Analysis Committee (TBFCC):**

It is tasked with dealing with any events that refer to translational bribery, fraud, and corruption, and take the appropriate steps according to current regulations and complying with the transparency and corporate ethics policy.

### **Conflict Analysis and Independence Committee:**

Its mission is to deal with any events related to conflicts of interest and take the appropriate steps, according to current regulations and complying with the policy on conflicts of interest, policies on donations, and any other provisions required from this autonomous body.



which support management and organizational performance to provide reasonable assurance in the achievement of strategic objectives. In addition, it mainly tends to:

- Promote an appropriate risk management culture in the Organization and its companies that support decision-making.
- Define the roles and responsibilities around risk management, internal control and evaluation; as well as the reporting and monitoring lines.
- Consider the risks that derive from the strategic definitions and business processes, and carry out adequate monitoring, evaluation and management of these risks.

### 3.1 Control Environment

In the Corporate Governance scheme of the GreenLand Business Group, it is essential to observe the values, principles, and integrity and transparency in the actions of the members of the Board of Directors, Executive Management and employees in general. For this, we have a Risk Management and Internal Control System, which addresses the nature, size, complexity, inherent risks of the activity carried out and legal requirements of each of the companies of the GreenLand Business Group, and with which is intended to provide reasonable security in achieving corporate objectives.

The internal organs of the Company that promote and are in charge of maintaining a solid environment and internal control system are:

#### **General Shareholders Assembly:**

As the highest instance of corporate governance, it is responsible for determining the mechanisms for management, evaluation and control, within the legal limits, and for examining the situation of the Company.

#### **Board of Directors:**

As the highest instance in the strategic orientation of the Organization, it is in charge of supervising the definition of the standards of conduct and evaluating their level of application, establishing a structure and supervision processes, aligned with the objectives of the Organization, of evaluating the review of the effectiveness of the internal control system and identifying opportunities for improvement and requesting information from the Executive Directorate on their implementation.

#### **Executive Direction:**

They are responsible for directing the implementation and maintenance of internal control and risk management procedures and systems, for verifying their operation within the Greenland Business Group and its proper functioning.

#### **Compliance officer for SAGRILAFT and PTEE:**

To comply with the provisions of external circular letters issued by the Superintendencia de Corporaciones (Superintendencia de Sociedades) 100-000003 of 2016 and 100-000016 of 2020, and external circular letter issued by the National Tax Authority (Dirección de Impuestos y Aduanas Nacionales - DIAN) 170 of 2002, this individual is appointed by the Board of Directors or the highest social representation body. For this reason, the individual has the power to manage the LA/FT/PADM-C/ST risks, and their functions are described in the SAGRILAFT and PTEE manuals.



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## 3.2 Comprehensive Risk Management

Comprehensive Risk Management contributes to the achievement of the strategic objectives of the GreenLand Business Group, and extends to the identification, analysis, evaluation, treatment, monitoring and communication of the different risks to which the Company may be exposed associated with the strategy, processes, projects and the protection of physical and human resources, as well as those related to sustainability and business continuity. **Integrated risk management policy.**

At the Organization, we manage risks comprehensively, through the following stages:

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## 3.2 Comprehensive Risk Management

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At the Organization, we manage risks comprehensively, through the following stages:

### **Context of Risks:**

It corresponds to a first stage where the situations identified reflect the reality of the GreenLand Business Group. By contextualizing the risks or opportunities it is possible to develop the following activities more easily.

### **Risks identification:**

It is the stage that allows the Organization to list, understand and define its risks.

### **Risk Analysis:**

Once the risks have been identified, the evaluation of the probability of a risk occurring, the impact it would cause and the importance of the risk should be included, associating information on its frequency, or how often the identified event occurs, its severity and the consequences that it may have about the Organization in economic, human, reputational and environmental terms.

### **Risks treatment:**

It is part of the risk analysis and evaluation stage and is where those responsible, actions and strategies are defined to avoid, mitigate, transfer or accept the identified risks.

### **Monitoring and evaluation:**

Register and update the risks and their rating, periodically report the results on the risk management carried out by each area of the Company.

## **Communication:**

Where the mechanisms are defined and it is guaranteed that the information of this process flows adequately within the Organization and is managed by higher instances (Chairmanship and Board of Directors). The information available must be clear, timely, up-to-date, accurate, available and verifiable.

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### **3.3 Control Activities**

Our Internal Control System contains a set of policies, principles, standards, procedures and mechanisms for verification and evaluation established by the Board of Directors and Executive Direction, its approach is oriented to the principle of self-control, where the process leader includes control as part of their responsibilities.

Control activities are carried out at all levels of the Organization, in the different stages of business processes and in the technological environment, there are preventive or detective control activities and can be manual or automated:

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- Corporate and process policies.
- Authorizations.
- Verifications.
- Reconciliations.
- Physical inventories.
- Performance reviews.
- Alerts in information systems.
- Automatic validation of transactional parameters.
- Segregation of functions.

## 3.4 Information and Communication

In the GreenLand Business Group we have implemented various mechanisms, policies and procedures for the management of information and communication at all levels and on: the institutional culture, philosophy, principles and values; in such a way that the Company considers the risks and control activities in its activities.

### Confidential Information Management Policy

In the GreenLand Business Group we conceive the information of suppliers, customers and employees as a strategic value of the business, which must be managed and protected, in order to preserve it as a competitive advantage and avoid risks derived from its disclosure.

**Confidential Information Management Policy.**

### Document Management Policy

In the GreenLand Business Group we define the guidelines for document management in any medium, physical and/or electronic, based on the methodologies and standards for the production of information from its creation, use and maintenance; guaranteeing at all times the integrity, authenticity and veracity of the information, under technical parameters of organization, processing, management, conservation and final disposal, supported by Archival principles.

**Document Management Policy.**

### Communications and Corporate Image Policy

The Greenland Business Group has defined the operating policy regarding the handling of communications, both internal and external, to guarantee that the information is transmitted efficiently, truthfully and in a timely manner to all the people who should know it.

**Communications and corporate image policy.**

### Transparency Line:



In the GreenLand Business Group we want to be recognized as an Organization that generates value for its stakeholders, in a reliable and sustainable way; we are responsible for our legal, social and environmental commitments; this is why we have the Transparency Line 018000-11-11-00, in order to report there all irregular situations that affect our relationships and commitments with different stakeholders.

## **Security Line**

In the GreenLand Business Group we have established a Security Line designed to receive information on situations that may affect or have affected the life and integrity of people, facilities, assets, imports and/or exports. This contact line is available 24 hours a day, 365 days a year. Our employees can contact the line: 339 6262 ext. 6260 or 828 0422 ext. 6260.

## **Technological Tools**

In the GreenLand Business Group we have ERP technological support to carry out the traceability of processes, products and services, providing, in real time, information in a reliable and secure way. Additionally, we have available as communication tools the corporate intranet, website and social media, as mechanisms to disclose information about the Company.

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## **3.5 Supervision**

In order to assure the Board of Directors that an effective and appropriate management of key business risks has been carried out and that the internal control system operates effectively, we have the following monitoring and control entities:

### **Audit and Finance Committee**

The Audit and Finance Committee is responsible for the oversight and supervision of risk management, architecture, components and internal control system and its continuous improvement, among other responsibilities described in its statute.

### **Internal Audit**

The mission and objective of the GreenLand Group Internal Audit area is to improve and protect the value of the Organization by providing objective assurance, advice and support based on risks.

The Internal Audit function of the GreenLand Group is an independent and objective assurance and consultation activity, conceived to add value and improve the operations of the Organization, helping to meet its objectives, providing a systematic and disciplined approach to evaluate and improve the efficiency of business, control and governance processes, through the application of internal audit standards and the use of best practices.

The GreenLand Group Internal Audit area extends its operations to all levels, functions, procedures, projects and structure of the Organization. The personnel that make up the Group's Internal Audit is completely independent and has no authority or responsibility over the execution of the processes and activities in which they carry out their work as Auditors.

### **Statutory Auditor and External Control**

External control is exercised by the Statutory Auditor.

It is in charge of evaluating whether the internal control measures of the Company are adequate, ensuring that accounting is kept correctly, timely reporting irregularities and ruling on the reasonableness of the figures in the financial statements and compliance with current regulations.

## Chapter 4.

# TRANSPARENT RELATIONSHIPS WITH STAKEHOLDERS

At the GreenLand Business Group we guide relations with the different interest groups in a manner consistent with our principles and values, we act with equity, justice, respect, transparency, austerity, honesty and frankness. The ethical guidelines that govern the relationships between the Company and its stakeholders are described below.

### 4.1 Shareholders



At the GreenLand Business Group we respect the rights of shareholders; our actions are aimed at protecting your investment and generating long-term and sustainable profitability. Only the chairman or whoever he delegates, communicates to the shareholders simultaneously, completely, impartially, accurately and in a timely manner the information affecting the value of their participation in the Business Group.

The Company discloses financial information and relevant information of interest to its shareholders, under the principle transparency, the law and good practices of Corporate Governance.

### 4.2 Customers

In the GreenLand Business Group we work to offer our customers quality products, we want them to be satisfied and for that we establish relationships of trust, seeking the mutual long-term benefit, offering timely solutions and being flexible to meet your needs and those of the market.



Negotiations must be expressed in clear and specific terms. Likewise, in the GreenLand Business Group we do not allow our employees to receive any benefit in money or in kind that compromises commercial relationships with customers.



## 4.3 Employees



The main driving force behind the GreenLand Business Group is our people, which is why we promote their professional and personal development, ensuring equal opportunities through action policies, recognizing their merits and capabilities. Additionally, we develop through corporate areas, training and wellness programs that aim to contribute to the improvement of the quality of life of workers and their families. Similarly, we ensure the health, safety, dignity, reputation and integrity of our employees and compliance with current regulations. We prevent and reject any manifestation related to workplace harassment.

## 4.4 Suppliers

In the GreenLand Business Group we establish mutually beneficial relationships with our suppliers as strategic business allies, based on quality, efficiency, respect and the best conditions for both parties, with the aim of achieving the expected economic results and generating opportunities for growth and development, under the recognition and respect for the ethical guidelines that guide our actions.

That is why, in the GreenLand Business Group, we do not allow our employees to give or receive hospitality, tips, gifts or any benefit in money or in kind, which may be compromising or be interpreted as consideration in commercial relations with suppliers. Likewise, we do not allow entering into, recommending, suggesting or executing contracts with suppliers who have family relationships with employees up to the fourth degree of consanguinity, second degree of affinity or first civil, spouse or permanent partner.



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## 4.5 State

In the GreenLand Business Group we guarantee respect and compliance with the rules in every place where we have a presence.

We carry out the management of the Organization's interest's vis-à-vis the authorities and State bodies, regarding the decisions and regulations that affect it, within the rules and mechanisms established by current regulations, and, through the unions to which the Company belongs.



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## 4.6 Civil Society

In the GreenLand Business Group we develop our business activities seeking a balance between economic growth, social development and care for the environment, contributing to the sustainable progress of the populations where we carry out our productive activity and work for the well-being of its inhabitants, implementing education, health and housing programs and projects. Through the GreenLand Foundation (FGL), we develop social investment programs, benefiting not only workers and their families, but also communities and the environment in general, promoting training in values and improving the living conditions of their habitants.

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## 4.7 Media

At the GreenLand Business Group we respect the independence of the media and facilitate their journalistic work. The spokesperson for the GreenLand Business Group is the exclusive head of the Communications area or spokespersons defined by the Chairmanship and Board of Directors, and under no circumstances are the employees of the Organization authorized to exercise said spokesperson to any media.

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## 4.8 Guilds

At the GreenLand Business Group, we guarantee our employees the right to free association and guarantee regulatory compliance with labor laws. Likewise, we apply the policies and procedures that are disclosed by the different unions to which the Company belongs.

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## 4.9 Government and Non-Governmental Institutions

At the GreenLand Business Group we are committed to the participation and accompaniment of entities that work for social and environmental development (private or public, for profit or non-profit, cultural or educational, national, regional or local government). The relationship with these institutions is developed in a balanced framework, constituted by the set of values, practices and commitments to create value, build trust and contribute to sustainable development.



## Chapter 5

# CODE OF ETHICS BUSINESS CONDUCT

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### 5.1 Objective

The objective of the Code of Ethics and Business Conduct is to establish the principles that guide our daily behavior in the Organization, consistent with the values, vision, corporate strategy, good sustainability practices and compliance with current legislation, in accordance with internal policies, standards and procedures, in order to promote healthy and sustainable relationships between the Company and its different stakeholders.

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### 5.2 Scope

The Code of Ethics and Business Conduct provides a framework of action for Shareholders, members of the Board of Directors, CEO, Managers, Directors, Heads of process, administrative and operational staff and, in general, for all those people who work directly or indirectly or acting in the name and on behalf of the different companies that make up the GreenLand Business Group.

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### 5.3 Policies

In order to guarantee fairness, transparency and equal conditions in relations with our employees and stakeholders, at the GreenLand Business Group we have defined the policies that govern their actions.

#### Sustainability Policy

The Sustainability Policy frames our way of managing business and promotes an organizational culture so that all employees share the Sustainability commitments in their daily routine. We understand that our actions go beyond agricultural production and commercialization and provision of agro-industrial services in a responsible manner, we are in permanent search of the wellbeing of the actors who accompany us on this path in the regions where we operate, hand in hand with the communities to build a country and contribute to the Sustainable Development Objectives.

Our Sustainability accounts for the actions undertaken in social, environmental and economic terms; being the result of an integrated work under the same approach and corporate guidelines, carried out by the different businesses that make up the GreenLand Business Group. **Sustainability Policy.**

#### Corporate Declaration of Respect

Respect for people is the fundamental principle that guides the actions of the GreenLand Business Group. We are a Company that prides itself on having a diverse team of people.

We believe in diversity and equity, as pillars to build the social fabric and as mechanisms that enrich not only the experience of the workers, but also of the Organization itself. Our strategic pillars and corporate policies harmonize with our values and principles. **Corporate Declaration of Respect**

## **Corporate Responsibility Policy**

At the GreenLand Business Group we are aware of the importance and need to be socially sustainable, environmentally responsible and ensure the quality and safety of goods and services. We strictly comply with regulations in matters: legal, environmental, tax, health, labor, among others. We prioritize the availability and efficient and responsible use of resources, we have structured a clear corporate governance, inspired by best practices, we generate labor wellbeing, through decent, fair and respectful work for our collaborators and we avoid discrimination in all its forms , under the principles of equality. **Corporate Responsibility Policy.**

## **Regulatory Compliance Policy**

At the GreenLand Business Group we respect the laws in force in each place where we have a presence. Our employees must not carry out, allow, tolerate or incite activities, operations or acts that violate or violate the current legislation of the country.

Likewise, all areas of the Company will ensure that the external entities with which the GreenLand Business Group has relationships or contracts services, also comply with the legislation in force in the corresponding country. **Regulatory Compliance Policy.**

## **Anti-Fraud and Anti-Corruption Policy**

In the GreenLand Business Group we are committed to the development of our businesses through a management model, based on socially responsible guidelines and objectives and in compliance with our values and ethical principles; we reject fraud and corruption and express a position of "Zero Tolerance." To this end, we permanently seek to implement adequate mechanisms, systems and controls that allow their prevention, detection and treatment. **Anti-fraud and anti-corruption policy.**

## **Confidential Information Management Policy**

In the GreenLand Business Group we conceive the information of suppliers, customers and employees as a strategic value of the business, which must be managed and protected, in order to preserve it as a competitive advantage and avoid risks derived from its disclosure.

For this reason, all employees are obliged not to disclose information without prior authorization and protect confidential information, such as: corporate and competitive strategy, distribution channels, financial reports, information about customers and/or suppliers and potential commercial transactions, information about new products, businesses and projects , and know-how on production activities, as well as any other type of information that may affect the competitiveness of the business and whose disclosure, unauthorized, may put the stability of the Company at risk. **Confidential information handling policy.**

## **SAGRILIFT Risk Management and Self-Control System Manual**

In the GreenLand Business Group we have adopted the policy and the Manual for Self-control and Risk Management of Money Laundering and Terrorism Financing, and we strictly execute the control mechanisms and procedures established to prevent and reduce the possibility that, the Company can be used as an instrument for the concealment or legalization of goods or money, product of criminal conduct, as well as mitigate the risk of loss or damage, which may arise from the materialization of associated risks (legal, reputational, contagion and operational). **SAGRILIFT policy and manual.**

## Admission and Third Party Creation Policy

In the GreenLand Business Group, the knowledge of third parties allows us to obtain information about the basic characteristics of potential clients, suppliers or employees before being linked, so the persons in charge of the links are obliged to follow all the procedures provided and necessary, to achieve adequate knowledge of it, even in the case of referenced or recommended persons. **Policy for creating, updating, and extension of third parties.**

## Security Policy

In the GreenLand Business Group we are governed by moral, ethical and lawful principles, as well as compliance with the BASC standard (Business Alliance for Secure Commerce) and the International ISPS Code (Protection of ships and Port Facilities), maintaining conditions that do not endanger the health, the integrity of the people and the security of the destination countries of our exports, guaranteeing safe international trade. **Security policy.**

## Conflict of Interest Policy

For the GreenLand Business Group, a conflict of interest is any situation or event in which a person linked to the Organization, when making decisions, which must be transparent and impartial, may be affected by direct or indirect personal interests and may be in opposition to or to the detriment of the interests of the Company, interfering in its performance and in the correct fulfillment of its responsibilities. Likewise, when there is any circumstance that may diminish independence, equity and objectivity in its commercial criteria, or when its actions may hinder the Company's decision-making.

Compliance with the GreenLand Business Group Conflicts of Interest Policy requires ethical principles and behaviors from our employees in commercial and contractual relationships with customers and suppliers of goods, supplies and services, in the selection and use of these for their own benefit or from a third party. Likewise, it demands from our employees ethical principles and behaviors in labor relations, where the interests of the Company take precedence over private interests; therefore, it is the responsibility of our employees to report any conflict situation of their own or that is identified among the employees and it will be the committee that defines the actions or administration of the conflict. **Conflict of interest policy.**

## Policy for the Use of Computer Resources

The Policy for the use of computer resources aims to define the guidelines for the responsible use of the technological resources that we offer to our employees and/or contractors for the execution of their activities, defining the privacy expectations of users and preserving the integrity of the computer resources such as computers, networks, information systems, programs and data that are property of the Company, even when they are not in its facilities, ensuring that their use complies with the laws, regulations and procedures of the Company and the country. **Policy for the use of computer resources.**

## Donation Policy

In the GreenLand Business Group we make donations for events in which the support of the Organization or its employees is required, we have guidelines for their authorization and administration. **Donation Policy.**

## 5.4 Harmonic and Respect Relationships

In the GreenLand Business Group we ensure the labor, social and health wellbeing of employees, in the same way, we maintain harmonious relationships and extend to the workers, the communities and the environment, taking care of natural resources and the environment.



### Freedom of Worship or Religion

At the GreenLand Business Group, our employees have the right to freely choose their religion or not to choose one and to exercise said belief publicly, without being the victim of pressure, discrimination or an attempt to change it by force.

### Forced labor

In the GreenLand Business Group we do not use coercive measures to summon the worker to carry out their work, we do not retain their identity documents when starting work, nor do we force them to leave money deposits.

### Freedom of Association and Collective Bargaining Rights

In the GreenLand Business Group, our employees enjoy the freedom to belong to trade union groups or other association schemes that exist in the countries where the Company has its headquarters. Likewise, workers' representatives, including union leaders, are not discriminated against and can interact freely with the members of these associations.

### Labor and Sexual Harassment

At the GreenLand Business Group we respect and defend the right to a workplace in which each employee can be productive, work in a safe environment, develop their skills and demonstrate their potential, free from intimidation and workplace and sexual harassment. Each employee is responsible for their behavior and the Company does not tolerate any action that involves harassment, intimidation or threats to any person.

## **Discrimination**

People must be treated with fairness and respect. At the GreenLand Business Group we value and benefit from individual and cultural differences. We promote individual expression, frank dialogue and a sense of belonging. We do not discriminate based on race, color, origin, religion, gender, sexual orientation, age or marital status, among others.

## **Disciplinary measures**

If necessary, in the GreenLand Business Group we carry out disciplinary measures taking into account the provisions of the law, conventions and collective agreements, always seeking harmonious relationships, fair treatment and mutual respect. At the GreenLand Business Group we do not tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse.

## **Health and Safety**

In the GreenLand Business Group we offer a healthy and safe workplace, and we ensure that the physical conditions of the employee are optimal for the performance of the work for which he was hired; Likewise, we supply the appropriate personal protective equipment for the execution of the work; for their part, employees must use them and abide by safety regulations.

## **Payments and Benefits**

In the GreenLand Business Group we comply with the payment of all the obligations established by labor legislation, including social security and duly inform about the details of these payments. Additionally, we provide our employees with more benefits than those established by law; as a complement, it recognizes various extra-legal benefits, both for administrative and operational employees.

## **Work for Minors**

At the GreenLand Business Group we do not hire minors or allow children to accompany adult workers in carrying out their tasks.

## **Environmental responsibility**

All employees of the GreenLand Business Group comply with and respect the laws in force in each of the places where we have headquarters, we take care of natural resources, promote clean production processes, energy efficiency, recycling, the rational use of water and reforestation, to guarantee the preservation of these resources to future generations.



## **Working hours**

In the GreenLand Business Group, working hours are governed by the rules established in the law and in the agreements reached with the workers in the collective bargaining agreements.

## **Chapter 6.**

### **BREACH OF THE PROVISIONS**

All employees regardless of their position or function, who violate the provisions of this Code of Government and Business Ethics, may be subject to disciplinary measures or corresponding actions, including the termination of the employment contract by unilateral decision of the Company and for just cause, without prejudice to the pertinent legal or judicial actions.

Likewise, employees who encourage another to breach the provisions of this Code, or who hide any situation of which they are aware and must be reported or hinder the investigation of possible fraud, may be subject to the measures described above.

## **Chapter 7.**

### **DISCLOSURE OF THE GOVERNANCE AND BUSINESS ETHICS**

In order to make this Code known to the Company's employees, shareholders and stakeholders in general, it will be published on the website of the GreenLand Business Group and/or through any other electronic means available for this purpose.

It is the commitment of all members of the GreenLand family to fully comply with this code and make it a daily practice in their activities; and it is the responsibility of the leaders of each business and area to ensure its disclosure, application and compliance.



# GreenLand



Grupo GreenLand  
[www.greenland.co](http://www.greenland.co)