Risks and Compliance

Code of Conduct

Suppliers and Customers

Sanimax

Introduction

It is a pleasure to present our Code of Conduct, which contains the guidelines that will help direct your actions in accordance with our corporate values.

Compliance with our Code of Conduct protects the interests of our suppliers and stakeholders by respecting and upholding the highest standards of ethical behavior, which must be an intrinsic part of the way we act. For this reason, Sanimax de Colombia S.A.S. prefers to work with partners who share and comply with our values and principles.

Each of our suppliers, customers, and/or third parties, from their respective roles, represents the image of Sanimax de Colombia S.A.S. For this reason, their actions must reflect our core values, which implies a shared responsibility with respect to compliance with our Business Transparency and Ethics Program.

We make this document available to you in order to communicate and promote our values and the responsible behaviors expected from each of you, within your different areas of activity.

You are a fundamental part of a Company that implements its processes within a Business Transparency and Ethics Program, managing the mitigation of risks associated with corruption and bribery. This document seeks to formalize the minimum ethical requirements expected of you as partners in our operation, extending this responsibility to your supply chain. In the event of subcontracting by the supplier, the supplier shall be responsible for ensuring that its contractors carry out their activities in compliance with the provisions of this document.

The Code of Conduct applies to all suppliers, customers, and third parties linked to the operation of Sanimax of Colombia S.A.S.

Thank you for your support and ethical commitment. Your contribution is essential to achieving the expected operational results and strengthening a culture of legality and transparency that positively impacts our responsibility toward society.

MIGUEL CARO
Senior Vice President and Country Manager Colombia

Our mission

To recover, renew, and return for a greener future.

Our vision

To be recognized by our customers as the best partner for the recovery and processing of organic waste.

Our corporate values

- Consideration: We care for one another.
- Integrity: We do the right thing.
- Improvement: We seek better ways.
- Collaboration: We work as a team.

Our principles

Every supplier, customer, or third party must respect the principles of Sanimax of Colombia S.A.S., promoting and respecting, among others, the following principles.

Principle of integrity

Act honestly and uprightly in all situations.

Description:

Integrity implies acting honestly and consistently with the company's values and principles, regardless of the circumstances. It is the fundamental pillar of all our activities and relationships.

Application:

- **Decisions and Actions:** All suppliers, customers, and third parties must make decisions and take actions based on truth and fairness, avoiding any form of deception or fraud.
- **Keeping Promises:** Fulfilling agreed commitments and promises is part of this principle.
- **Transparency in Communication:** Maintain clear, open, and truthful communication, ensuring that all information provided is accurate and complete.

Principle of responsibility

Assume the consequences of the actions and decisions made.



Description:

Responsibility means assuming the consequences of the actions and decisions made, whether positive or negative. In the development of this principle, the entire workforce and partners of Sanimax of Colombia recognize the duty to be accountable and to correct any mistakes made.

Application:

- **Fulfillment of Obligations:** Comply with legal, contractual, and ethical obligations in all operations.
- **Environmental Management:** Act responsibly with respect to the environment, minimizing the negative impact of our operations.
- **Safety and Well-being:** Prioritize the safety and well-being of employees, those involved in the supply chain, and the community in general.

Principle of respect

Treat all people with dignity and respect.

Description:

Respect refers to treating all people with dignity, courtesy, and consideration, recognizing and valuing diversity and the contributions of everyone.



Application:

- **Inclusive Work Environment:** Promote a work environment in which diversity is valued and respected, and where inclusion and equal opportunities are encouraged.
- **Professional Interactions:** Treat colleagues, customers, suppliers, and other stakeholders with respect, avoiding any form of discrimination, harassment, or inappropriate behavior.
- **Respect for Intellectual Property:** Recognize and respect the intellectual property rights of third parties.



Principle of transparency

Maintain open and truthful communication

Description:

Transparency maintaining means attitude of and openness and honest communication in activities and decisions, providing truthful and complete information to all stakeholders.

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Application:

- **Reports and Documentation:** Provide accurate and complete financial and operational reports, complying with applicable regulations and standards.
- **Internal Communication:** Facilitate open communication within the organization, ensuring that employees are informed and can freely express their concerns.
- **Stakeholder Relations:** Maintain clear and honest communication withcustomers, suppliers, shareholders, and the community.

Principle of legality

Comply with all applicable laws and regulations.

Description:

Legality refers to the commitment to comply with all laws, regulations, and rules applicable to all our operations and activities, ensuring that we act ethically and lawfully.

Application:

Regulatory Compliance: Strictly adhere to all local, national, andinternational laws governing our operations.

Training and Awareness: Provide ongoing training to employees on the lawsand regulations relevant to their roles and responsibilities.

Monitoring and Auditing: Implement control and auditing systems to ensurelegal compliance and detect potential non-compliance in a timely manner.

Duties of our suppliers, customers, and third parties:

At Sanimax, we do the right thing. It is part of our values and the foundation of ethical conduct in our daily activities. This document is not intended to list every situation that may affect ethics in your performance, but rather to guide correct decisions and facilitate the process.

As a supplier, customer, or third party of Sanimax, it is expected that:

A.All suppliers, customers, and third parties will promote adherence to this Code,reaffirming their personal commitment to their obligations and ensuring itsunderstanding throughout their supply chain and among other representativesassociated with their relationship with Sanimax de Colombia S.A.S.

B.Any supplier, customer, or third party who becomes aware of an incident that, intheir judgment, constitutes a violation of this Code must immediately inform theperson responsible for their management at Sanimax, or, if they prefer, they may doso directly through the reporting channel provided by the Company.

Sanimax of Colombia S.A.S. provides a reporting channel to report irregularities and conduct contrary to its business ethics policies (PTEE). Our internal complaint management procedure establishes the measures to be followed to ensure that reports are handled in a confidential, secure, and effective manner.

To file a report, please contact us through the following channels:

Online: Visit the website www.clearviewconnects.com, where you must enter the Company name Sanimax.

By phone: Call the TOLL-FREE number **01800-518-9364,** where you may choose to speak with an advisor or leave a voicemail message.

Please remember that you have the support of the Risk and Compliance Department to address any questions that may arise when filing your report. For this purpose, the email address **lineaetica@sanimax.com.co** has been made available to resolve your concerns.

The Risk and Compliance Department team will acknowledge and register your report, guaranteeing the confidentiality of the reporting party, and will initiate the necessary procedures for its handling.

C.All operations and activitiescarried out by suppliers or customerson behalf of Sanimax must begoverned by the ethical principles established in this Code.

D.No supplier, customer, or third party may advise on or intervene in situations thatallow, protect, or facilitate improper acts, including those that may be used to misleador take advantage of the good faith of third parties or be used in a manner contraryto the legitimate interests of Sanimax, such as misleading advertising, industrialespionage, and non-compliance with labor, commercial, social, and other obligations.



Principle of non-retaliation

No disciplinary action shall be taken against any supplier, customer, or third party who, in good faith, reports any incident considered to be a violation of the provisions of this Code.

Accordingly, no conterparty that reports a possible act of corruption or bribery within or related to Sanimax shall be or may be subject to retaliation, punishment, sanction, revenge, aggression, or offense by the company.



Ethical management of the environment

Respect for the environment: At Sanimax, we honor respect for the environment and are fully committed to its protection. Therefore, every supplier, customer, or third party linked to Sanimax will be committed to safeguarding respect for the environment, complying with regulations according to each economic activity.

Quality of the service or good: As the requesting party, Sanimax requires that the service or good provided by each supplier, customer, or third party meet the highest standards of productivity, quality, and the requirements agreed upon between the parties.

Relationship with authorities: The company's relationships with the government, governmental entities, and other public authorities must be conducted within the framework of the law. Therefore, every supplier, customer, or third party linked to Sanimax will be committed to acting within the framework of the law and ensuring proper conduct in accordance with the established legal principles.

Relationship with customers and users: Compliance with the provisions of this Code of Conduct – Suppliers and Customers extend to the entire supply chain of our suppliers, customers, and third parties, as applicable. In this context, our partners must refrain from doing business with individuals or legal entities known to engage in business conduct contrary to the law.

Likewise, they must clearly state the conditions of the goods and services, in such a way that Sanimax may fully understand the products and services, as well as the reciprocal obligations generated in all commercial activity.

Requests, claims, and requirements must be addressed in a timely and accurate manner, in accordance with the law and the respective contracts.

Relationship with competitors: Fair competition shall be maintained as a basic element in all operations and relationships with other institutions in the sector, in accordance with the principles of fair competition. Accordingly, our suppliers, customers, and third parties must act in alignment whenever they represent Sanimax of Colombia S.A.S.

Ethics and transparency

Rules on conflicts of interest:
Conflicts of interest arise when the personal, family, or financial interests of an employee, supplier, customer, or third party may improperly influence their decisions and negatively affect the company.

Identification and Disclosure:
Suppliers, customers, and third parties must identify and disclose any situation that may represent a conflict of interest. This includes family relationships, financial interests, and any other connection that may influence dealings with Sanimax of Colombia S.A.S.

Consanguinity and Affinity:
A conflict of interest arises with respect to family relationships, considering the following:

When, in any case, the supplier or customer has a family relationship with Sanimax de Colombia employees up to the fourth degree of consanguinity (parents, children, siblings, uncles/aunts, nephews/nieces, and cousins), second degree of affinity (parents-in-law, children or siblings of the spouse or permanent partner), and first civil degree (adoptive parents and adopted children).



Likewise, this includes the spouses or permanent partners of suppliers or customers, or persons with whom they have children in common. If the family relationship involves a member of the Executive Committee or any position up to the Director level, the Risk and Compliance Department must be informed prior to onboarding so that, together with the area that will manage the future counterparty, the following may be determined:

- Whether the family relationship with the employee or employees gives rise toa conflict of interest depending on the context.
- If a conflict of interest is identified whether functional autonomy between theparties involved is possible.
- If functional autonomy cannot be achieved, whether it is necessary toconsider new options to avoid affecting the purpose of the relationship.
- At the time a supplier joins the Company, if that supplier is a relative of anemployee, there may be no contractual oversight relationship between them,nor any exercise of control activities by one over the other.



Conflict Declarations:
Prior to onboarding as a supplier or customer, the supplier must answer the questions related to the detection of conflicts of interest indicated in the Onboarding Form. If, after onboarding, the supplier finds itself in a conflict-of-interest situation, it is necessary to report this situation to **lineaetica@sanimax.com.co,** where the Risk and Compliance team will request that the "Conflict of Interest Declaration" form be completed.

Assessment and Resolution:
The company will adopt appropriate measures to manage and resolve any conflicts of interest that arise, in accordance with the defined contractual framework and the implications of the conflict.

Zero-Tolerance Policy:
Any breach of the conflict-of-interest policy will be evaluated in light of our Business Transparency and Ethics Policy.

Note:

Once a conflict of interest becomes known, the area manager responsible for the supplier, together with the Compliance Officer and other involved areas, will assess the appropriate course of action, applying the following measures in accordance with the approved contract:

a. Gradually suspend commercial relationships.
b. Temporarily suspend commercial relationships.
c. Terminate commercial relationships.
d. If necessary, disciplinary measures will be taken.

Note:

The seriousness of the case will be assessed with the legal support team in relation to possible contractual breaches.



Anti-Bribery and Anti-Corruption Policy

Legal Obligations:

At all times, during the performance of their duties, suppliers and customers must act with prudence, diligence, honesty, and loyalty. It is essential that all suppliers, customers, and third parties of Sanimax de Colombia S.A.S. comply with all applicable laws, refrain from committing acts that violate such laws, and avoid being directly or indirectly involved in actions considered unacceptable.

To ensure ethical management in the onboarding of Sanimax suppliers and customers, the following conduct is prohibited:

Bribery:

It is strictly prohibited to receive payment, a promise of payment, cash, or gifts of any kind from any public or private, domestic or foreign official, or in general from any person, to one or more employees of Sanimax de Colombia, when the purpose is to corruptly influence an act or omission in order to help our Company or parties linked to our operation obtain an improper advantage.

Corruption:

Corruption refers to the misuse of the position of authority held by a person or group of persons for an undue benefit for themselves or a third party; that is, the position of power is used to obtain advantages in relation to a fact, opportunity, or any other circumstance. In this context, it also includes conduct in which a company benefits, seeks a benefit or interest, or is used as a means in the commission of crimes against public administration or public assets, or in the commission of acts of Transnational Bribery.

Accordingly, the duties of our partners acting as suppliers and customers are set out below.

- Our suppliers, customers, and partners in general shall refrain from offering,promising, or delivering gifts in any form, whether cash, presents, services, orother benefits, to members of Sanimax's workforce for the purpose ofobtaining a particular benefit.

- Institutional or promotional gifts that are part of the ordinary course ofbusiness, such as planners, pens, and other items of minimal value, may beoffered, provided this does not affect the Company's business decisions

- Our suppliers and customers shall refrain from proposing monetary or in-kindcontributions to Sanimax employees for the purpose of supporting politicalcauses involving the Company's image.

- **Gifts:** No supplier or customer linked to our operations may directly orindirectly offer or accept gifts, donations, invitations, travel, or payments inconnection with activities carried out for Sanimax de Colombia that couldinfluence decisions to facilitate business or actions for personal benefit.

Mitigation management, money laundering, and terrorist financing

Sanimax of Colombia is committed to preventing the risk of money laundering, terrorist financing, and their associated risks.

Suppliers and customers shall be treated with respect and courtesy by Sanimax de Colombia's workforce and likewise shall treat Sanimax de Colombia employees with respect and kindness.

For this reason, the onboarding of future partners will be carried out only after knowledge of the counterparty has been obtained, considering the outcome of its risk profile.

Accordingly, in compliance with our risk prevention policies, our suppliers and customers shall provide the information required by Sanimax de Colombia for the proper conduct of due diligence, disclosing any background that may imply contagion risk related to money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, bribery, or corruption.

Likewise, our counterparties shall facilitate the updating of their information after onboarding, to maintain a sound relationship within the framework of business transparency and ethics.

Relations with Public Officials: Any customer or supplier who meets the conditions to be considered a Politically Exposed Person (PEP) shall be responsible for providing the information required for enhanced due diligence, as well as updating such information annually.

Responsibility toward the business

Handling of privileged information:
Privileged information includes specific information about Sanimax, its customers, or suppliers that has not been disclosed to the public and that, if disclosed, would influence decision-making. Suppliers and customers who have access to such information in the course of their work must protect it and must not disclose it or use it for their own benefit or that of third parties.

Protection of business data:
Suppliers and customers must take all reasonable measures to preserve the confidentiality of Sanimax data and must not disclose such information without express authorization, even after the termination of the business relationship with Sanimax.

Confidentiality:

Suppliers, customers, or third parties shall have access to confidential information only as required for the contractual purpose of their relationship. They may not disclose Sanimax confidential information without prior authorization, and under no circumstances may such information be used to promote their personal interests or those of a third party.
The duties of confidentiality shall continue to apply even after termination of the contract with Sanimax..

Note: Contractual confidentiality policy.



Responsible use of social media:
Personal opinions expressed by suppliers and customers on social media must not involve the image of Sanimax in a way that presents their personal views as a corporate position.

Political stance:
Sanimax respects the political conditions of the countries in which it operates, without identifying itself with any specific position or ideology. The political positions and ideologies of suppliers must not be interpreted as reflecting the official position of Sanimax.

Sanctions regime

The provisions issued in this Code of Conduct are mandatory for all Sanimax suppliers and customers and its affiliated companies. Non-compliance shall be reported to the Risk and Compliance Department by the area that manages the supplier or customer, or through the reporting channel. Once the conduct has been identified, the context of the evidence will be analyzed, considering the following actions within the scope of what has been contractually agreed.

Actions to be considered:

- Gradual suspension of commercial relationships.
- Temporary suspension of commercial relationships.
- Termination of commercial relationships.

Note: Depending on the seriousness of the breach, the legal support team will assess the severity of the case to determine the measures to be implemented. These may range from a simple warning up to disqualification as a Sanimax supplier, without prejudice to any other applicable legal or administrative actions.

By accepting and signing the Code of Conduct for Suppliers and Customers, you undertake to:

- Comply with this Code for as long as you remain a supplier of Sanimax deColombia S.A.S.
- Participate in verification activities related to this Code that may beestablished by Sanimax de Colombia S.A.S.
- Implement corrective actions, if necessary, because of any verification activitycarried out by Sanimax de Colombia within your organization.
- Communicate to Sanimax any information you consider relevant in relation tothe requirements established in this Code.



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