

TRANSPARENCY AND BUSINESS
ETHICS PROGRAM

CODE:CORP-TH-TD-048

EDITION:002



TRANSPARENCY AND BUSINESS ETHICS PROGRAM

Business ethics is the set of rules, values and principles reflected in the company culture, ethical actions continuously encourage the generation of better decisions, better behaviors, motivation and permanence at work.

The business ethics program seeks to strengthen an organizational culture based on the elementary principles of ethics, it focuses mainly on the identification and prevention of those potential conducts that do not comply with internal regulations and the Law, ensuring transparency and fidelity in the Company information of any nature and safeguard the good image and reputation of the Company and its brands.

Ethics is today as important at CASALUKER as technology, security or processes, so it is essential that we KNOW our ethics program, our ethical guidelines and the ethical practice among all collaborators.

The objective of business ethics at CASALUKER is to achieve greater harmony in the company and allow greater adaptation to all environments in conditions that involve respecting the rights recognized by society and the values that it shares.

All directors, executives and employees, in compliance with the conflict-of-interest policy CORP-NM-FOR-119, will ensure that the decisions made in the course of their activity are aligned with the interest of the company. Conflicts of interest must be reported in order to adopt the conduct necessary to guarantee the independence of judgment.

CONFLICT OF INTEREST is understood as any situation that arises in which a CASALUKER collaborator sees impartiality in making decisions that infer or not in their position, due to the existence of an alien and external element to the real interests of the Company, be it of a personal, family, economic, friendship nature, among others, which may affect the correct decision-making and the suitable and adequate selection of different projects.

CasaLuker's Anti-Fraud and Anti-Corruption Policy COPR-SEG-MN-002 aims to promote the development of actions against fraud or corruption, promote transparency in administration management, deter improper conduct and

encourage the commitment of CasaLuker, its administrators and its collaborators against fraud or corruption.

CASALUKER is committed to all its business associates working under high security standards to prevent the materialization of illicit activities, corruption, money laundering, drug trafficking, bribery and financing of terrorism in our supply chain.

For CASALUKER, the diversity of its talent is essential to strengthen equal opportunities, generate synergies and have a positive impact on society.

We are committed to acting responsibly, by preventing, mitigating and compensating for the environmental impacts that production processes may generate.

We promote good environmental practices to ensure the proper handling and management of waste, savings and efficient use of water and energy, and the reduction of our carbon footprint, thus mitigating the impacts generated by our productive activity. We establish and implement procedures that allow us to identify and control the environmental aspects of our operations and strengthen our environmental management.

DECLARATION OF TRANSPARENCY, INTEGRITY, AND BUSINESS ETHICS

CasaLuker is an ethical, social and environmentally responsible company, we are committed to fair and unprejudiced treatment before all the entities with which we have direct or indirect contact and to the protection of natural resources. Therefore, all activities involving The Company and its strategic allies must be based on integrity, honesty, sustainability and compliance with the law; consequently, we are consistent, we act at all times with ethics, honesty, impartiality and integrity; always in compliance with our rules and procedures.

This transparency and business ethics program is articulated with the conflict-of-interest policy CORP-NM-FOR-119 and the anti-fraud and anti-corruption manual COPR-SEG-MN-002, defining clear guidelines for the entire human team linked to CASALUKER as well as all related parties and interest groups, understood as customers, suppliers, contractors, shareholders, and in general all those with whom a commercial, contractual or cooperative relationship is established directly or indirectly.

Taking this scope into account, at CASALUKER we identify ourselves and commit to the following:

1. We comply with all laws and regulations applicable to the country.

2. We do not offer, invitations, loans, benefits, services or gifts of sumptuous amount (greater than 25% of a SMMLV), favors, payments or special treatment of any kind, by any person or organization that does business with the company to any collaborator of the Company.
3. We comply with the established dates of delivery, quantity and competitiveness in the market, guaranteeing the service or the product that we offer.
4. We offer products and/or services that comply with current legal regulations, safety standards, quality, safety and other requirements.
5. We report any link of familiarity with any collaborator of the company.
6. We point out and clarify all aspects and additional elements to our products or services, which are necessary for it to function fully and properly.
7. We are fair in the treatment and working conditions towards our collaborators, in all aspects, the work performed must be based on labor relations recognized and established through legislation, they will not be eluded through practices in which there is no intention of providing skills to the worker or to provide him with a regular job, nor will these obligations be avoided through the excessive use of contracts of limited duration.
8. We promote compliance with working hours and days, ensuring the rest and well-being of our collaborators, in accordance with the provisions of the law.
9. The collaborators will not have to leave "deposits" or identity documentation in the custody of the employer, they will be autonomous to decide their relationship and subsequent termination of the contract with the company.
10. We ensure remuneration in salaries and/or other benefits according to the activity carried out by the company's collaborators.
11. We do not promote labor exploitation or force a person to work to satisfy a debt or other obligation with the company, nor do we impose a commission to access the job itself.
12. We reject all forms of child labor and any other expression of modern slavery, no individual who has not reached the minimum age established by law will ever be hired for work. Minors will only be employed in cases in which the Law accepts it, giving support for initiatives such as student interns and internships.
13. We will always have equal opportunities for all, rejecting all forms of discrimination, including discrimination based on gender, ethnicity, religion, we reject all forms of verbal or physical harassment and unfair practices, and we promote freedom of association.
14. We have a fair and adequate workplace for our workers to carry out their activity, likewise, we provide clean, safe, and decent workplaces so that our collaborators develop their full potential.
15. Safety and health at work are a commitment and a responsibility of all.
16. We are aware of the impact that our operations have on the environment and therefore our products, services and practices take care so that the impact on it is as small as possible.
17. We care about the impact our operations have on the communities where we operate.
18. We ensure that the actions and decisions taken by the company and its collaborators do not violate the principles of fair competition.

19. We have policies and procedures aimed at detecting money laundering, smuggling and other practices associated with the financing of terrorism.
20. We provide true and accurate information for the correct development of activities with CasaLuker.
21. Our company can only inform and/or forward documents to the external public, as long as the authorship is duly authorized and identified.
22. We keep absolute confidentiality of sensitive information that may become known about CasaLuker and/or its workers.
23. We have communication channels so that all news within our company can be dealt with in due instances and resolved by impartial personnel with sufficient autonomy to take action in this regard.
24. We report through the following channels situations that are sensitive to non-compliance with any numeral set forth in this document:

Internal level:

- Verbal Mechanism: Security Line 018000113770 – Extension 10123
- Written Mechanism:
Committee of coexistence: comitedeconvivencia@casaluker.com.co
CL application takes care of you- Module line 123.

Important: For internal collaborators, such situations may be reported to the immediate boss and/or talent verbally or in writing and later the collaborator must register the case in the CL cares for you application.

External level:

- Verbal Mechanism: Security Line 018000113770 - Extension 10123
- Mechanism Written: Web: <https://www.casaluker.com/casaluker123>

<p>ELABORATED:</p> <p>ANGELICA MARIA CASANOVA GONZALEZ SELECTION COORDINATOR</p>	<p>REVISED:</p> <p>MARIA ALEXANDRA FAJARDO TALENT MANAGER</p> <p>NOREEN JUDITH ORTIZ FLOREZ TALENT CHIEF</p> <p>LAURA CANO MERIZALDE DIRECTOR OF CULTURE LUKER CHOCOLATE</p>	<p>APPROVE:</p> <p>JAIME ALBERTO DELGADO ADMINISTRATIVE DIRECTOR</p>
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