



HUMAN RIGHTS POLICY - CASALUKER S.A.

CASALUKER S.A., as a Colombian company committed to respecting and guaranteeing human rights, through this policy reaffirms existing commitments in the company, and sets parameters to ensure due respect and implementation of human rights at all levels of the company, both in relations with its workers, as well as with customers, shareholders, managers, suppliers, contractors, and others who may have a direct or indirect relationship with the company.

In this sense, as a normative reference, CASALUKER S.A. bases its human rights policy on the (i) Political Constitution of Colombia, its preamble, articles 1, 12, 17, 93, 95 numeral 4, which reaffirm the consolidation of Colombia as a State founded on respect for human dignity, with obligations for individuals and companies to ensure that respect; (ii) the Universal Declaration of Human Rights, especially its articles 2, 4, 7, 18, 23 and 24; the International Covenant on Civil and Political Rights; the American Convention on Human Rights; and fundamental conventions of the International Labor Organization, in particular, Conventions 138 and 182 on child labor, Convention 29 on forced labor, Convention 87 and 98 on the right of association and collective bargaining and Convention 111 on non-discrimination in the workplace.

In addition to the above, CASALUKER S.A. takes into account for purposes of this policy, the Principles of the United Nations Global Compact, regarding

- Companies must support and respect the protection of universally recognized fundamental human rights.
- Companies must ensure that they are not complicit in the violation of human rights.

GUIDELINES

RESPECT FOR HUMAN RIGHTS

In all areas of operation, CASALUKER S.A. observe and respect human rights and seek to remedy those situations in which this purpose is failed. CASALUKER S.A. will avoid complicity in human rights abuses.

RESPECT OF LABOR RULES AND SOCIAL SECURITY

All actions must be carried out respecting labor rights, freedom of association, due process and the right of defense. In no case will harassment at work or sex, or forced child labor or in conditions that threaten health and safety.

CASALUKER S.A. will promote and strengthen representation and bipartite mechanisms (presence of workers and employer) legally responsible for the prevention and resolution of



workplace harassment, such as the committee of labor coexistence, so that its work can be more effective.

NO DISCRIMINATION

The selection of human talent should be based on the competences and merits, and not make decisions based on unjustified differences, such as discriminating factors such as race, gender, sex, sexual orientation, socioeconomic status, religious beliefs, among others. CASALUKER S.A. avoids any form of discrimination in employment or occupation. CASALUKER S.A. will monitor the gender differences present in society and that the company prevents, such as gender wage and labor gaps and promote their solution.

FREEDOM OF EXPRESSION AND CONSCIENCE

Everyone in CASALUKER S.A. has the right to freedom of thought, conscience, religion and political expression; this right includes the freedom to change one's religion or belief, as well as the freedom to manifest one's religion or political conviction, individually and collectively, both in public and in private, by teaching, practice, worship and observance. In this regard, CASALUKER S.A. understands that freedom of expression and conscience in the workplace is a presupposition for democracy and participation, in accordance with what will be indicated below in relation to labor cooperation and democracy in the workplace.

MEASURES OF PROTECTION AGAINST CHILD EXPLOITATION

CASALUKER S.A. will tend for the hiring of people of legal age, through labor link, respecting all the labor and benefits guarantees established in the regulations. When, due to exceptional circumstances, a minor between 15 and 18 years of age must be hired, a written authorization must be obtained from the Ministry of Labor, or in its absence from the first local authority, at the request of the parents, and in the absence of these, of the Family Defender, in which it is guaranteed that the human rights of the minor are not being infringed. CASALUKER S.A. will comply with all legal obligations and requirements that the Ministry of Labor issues for that purpose.

Hiring minors only occurs when an apprentice or trainee, requires linking through a learning contract, which in no case constitutes employment relationship, to perform their teaching or productive period, as appropriate, according to legal regulations in force, especially article 3 of law 933 of 2003, articles 2.2.6.3.3 and 2.2.6.3.1 of Decree 1072 of 2015, in accordance with the Code of Childhood and Adolescence.

CASALUKER S.A. will identify those activities in the supply chain that due to their level of risk or because of the activity itself does not allow the participation of young workers, and for this reason they are excluded from the activities in which are allowed work with the permission of the Ministry from Labor. In these activities, CASALUKER S.A. will implement mechanisms to prevent illegal child labor.



LABOR RIGHTS

All workers who enter CASALUKER S.A. will do so voluntarily, under fair and satisfactory conditions of work, and in work environments that comply with all the provisions regarding Occupational Health and Safety.

Every worker has the right, without any discrimination, to equal pay for equal work, to exercise his(her) right of association, and to an equitable and satisfactory remuneration, which assures him(her), as well as his(her) family, an existence in accordance with human dignity.

CASALUKER S.A. rejects forced or compulsory labor, and respects the freedom of association and collective bargaining, as well as non-discrimination and the rights of minorities. The work promoted by CASALUKER S.A. is remunerated, without threats and to which the person has offered completely voluntarily.

CASALUKER S.A. promotes democracy in the workplace and labor cooperation with its workers, in this sense, promotes mechanisms for consultation and information to workers in the decisions they consider can have a significant impact on their lives. The above, welcoming recommendations 94, 113, 129 and 130 of the International Labor Organization.

ANTI-FRAUD AND ANTI-CORRUPTION POLICY


The business ethics program - Anti-fraud and anti-corruption policy of CASALUKER S.A., has been developed in accordance to its corporate governance policies, with the purpose of establishing the organization's guidelines on prevention, detection and investigation of national and transnational frauds.

The Anti-Fraud and Anti-Corruption Policy of CASALUKER S.A. aims to promote the development of actions against national, transnational and / or corruption fraud, as well as promoting transparency in the management of the administration, deterring undue conducts and encouraging the commitment of CASALUKER SA, its administrators, workers, contractors against national and transnational fraud and corruption.

The Anti-Fraud and Anti-Corruption Policy joins the other efforts of the company in its interest to align the strategies and operations with the universally accepted principles in the United Nations global pact against corruption.}

ENVIRONMENT

CASALUKER S.A. is committed to acting responsibly, through the prevention, mitigation and compensation of the environmental impacts that their production processes may generate. Promotes good environmental practices to ensure proper management of waste and generated impacts, establishes and implements procedures that allow the development and control of environmental

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management activities.

IMPLEMENTATION AT THE INTERNAL LEVEL

COMPLIANCE WITH LEGAL ORDER AND INTERNAL NORMATIVITY

The laws that regulate the scope of operation of CASALUKER S.A. shall be known, observed, applied and complied with, in accordance with the respect for human rights, applicable to each of the activities inherent to or related to the organization. Likewise, the policies, codes, circulars, manuals, processes or procedures established by CASALUKER S.A.

MECHANISMS FOR THE PREVENTION OF VIOLATION OF HUMAN RIGHTS

CASALUKER S.A. will have the following preventive mechanisms, aimed at eliminating the risks of possible violations of human rights, or tolerance to them, by customers, shareholders, managers, suppliers, contractors, and others who may have a direct relationship or indirect with the company.

- The present policy will be disclosed through the INTRANET of CASALUKER S.A., in such away that it can be consulted by all workers, shareholders and managers.

- All persons who have a direct or indirect relationship with CASALUKER SA, and who find that some of the guidelines established in this policy are being violated, and that therefore a human right may be affected by workers, customers, shareholders, directors, suppliers, contractors, may send the respective notice through the following means, thereby allowing the subject to be analyzed and taking appropriate measures:

Internal Level:

- Verbal Mechanism: Security line 018000113770 - Extension 10123.

- Written Mechanism:

Coexistence Committee: comitedeconvivencia@casaluker.com.co

Application CL te cuida- line 123.

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


External level:

- Verbal Mechanism: Security line 018000113770 - Extension 10123.

- Written Mechanism: Web: <https://www.casaluker.com/casaluker123>

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- The persons mentioned in the previous numeral will commit to comply with this policy. The communication channels destined by the company will be constantly verified to report cases of possible human rights violations and the rights established in this policy, with the purpose of issuing a timely response.

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- CASALUKER S.A. ensures confidentiality with respect to the identity of the complainants of possible situations of violation of human rights, except for the requirements of judicial entities.

- No type of reprisal or sanction will exist against the person who reports possible situations of violation of human rights. The company will take positive actions in favor of those who report situations of human rights violations, if it is understood that the complaint can generate risks for those who interpose it. In this sense, it is valued, the fact of receiving a complaint of violation of human rights.

- CASALUKER S.A. prevents the maintenance of commercial or contractual relations with natural or legal persons, constituted under any associative modality, that violate, disrespect or tolerate the transgression of human rights, and in case of evidencing the above, will inform the respective authorities of such situation, to advance the investigations of the case. In this regard, CASALUKER S.A. will promote the fulfillment of human rights within the participants of the value chain of CASALUKER S.A.

- CASALUKER S.A. will promote a culture of respect for human rights at all levels of the organization.


EXTENSION AND CONTROL AT EXTERNAL LEVEL

DEVELOPMENT AND INTEGRATION OF SUPPLIERS

Regarding development and integration with suppliers of goods and services (different from suppliers of cocoa and coffee), during 112 years of history, CASALUKER S.A. has been building relationships of trust and strengthening in compliance with social, environmental and economic regulations to ensure that development is parallel and that it contributes to the development of the country and its communities.

This is why the beginning of commercial relations are framed by the supplier creation format CORP-CG-FOR-028 Legal Person, CORP-CG-FOR-029 Natural Person and CORP-CG-FOR-030 Foreign Provider, in which are consigned the DUTIES OF THE PROVIDER such as:

- A. Send information (legal, general and technical support) updated each time it is requested, or a change is generated within the provider's organization.
- B. Comply with the current applicable legal regulations and quality standards.
- C. Demonstrate social commitment through the payment of social security EPS, Pension, ARL, layoffs, employee fund, foundations, for all their workers.
- D. Not to incur or tolerate practices of prohibited child labor, forced labor, violations of the right of association and collective bargaining as in discriminatory practices.

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These principles are corroborated through a process Supplier Management System Assessment CORP-CM-FOR-001, a document that allows a preliminary assessment of the supplier's management and its social and corporate responsibility with questions such as:

1. Do you have a system that allows you to ensure compliance with established ethical principles?
2. Is the company part of social projects?
3. Does the company have policies to prevent discrimination, child labor, exploitation?
4. Do you have fair and satisfactory employment conditions regarding wages, work times, vacations, etc.?
5. How are suppliers created in your company?

After this and through a process of development and monitoring of suppliers according to their criticality, it is evaluated and shows how they are still aligned with the company's expectations and based on these aspects, the decision is made to continue commercial relationships that strengthen the growth and impacts on interest groups.

SELF-CONTROL SYSTEM AND MANAGEMENT OF THE RISK OF MONEY LAUNDERING AND FINANCING OF TERRORISM

The Self-Control and Risk Management of Money Laundering and Terrorism Financing System (SARLAFT) of CASALUKER SA, has the purpose of having policies, mechanisms, processes, procedures, methodologies and controls for the entity to protect itself from being used as instrument by any means to give the appearance of legality to assets derived from criminal activities (money laundering) or to channel resources aimed at carrying out terrorist activities (financing of terrorism) or to conceal assets derived from such activities in compliance of the internal policies of the organization as well as the regulations that regulate it, especially in relation to the protection against money laundering and the financing of terrorism.