



**INTEGRITY POLICY
FOR THIRD PARTIES
PROFERTIL S.A.**



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I. Introduction

In order to promote an ethical culture in the exercise of all its activities, Profertil S.A. ("Profertil" or "the Company") has developed a series of policies that address specific issues, which are supplementary to the Code of Ethical Conduct and the Code of Ethical Conduct for

These policies apply to our contractors, subcontractors, suppliers, associated persons, commercial intermediaries, non-commercial representatives, consultants, business partners or anyone providing services for or on behalf of the Company (collectively, "Third Parties"), who must adhere to and accept the guidelines developed here.

The objective is for the Third Parties to receive guidance on various topics in our Compliance Program, including the risks they may face in carrying out their respective activities.

1. Diversity and Inclusion

- a. In Profertil we work committed to our mission and vision within a framework of good organizational climate.

Therefore, we strive to promote a safe, inclusive and agreeable environment, where respect, acceptance and nondiscrimination are the priority.

We promote a business culture open to diversity, where the differences and abilities of each individual are valued and where equal treatment of people prevails regardless of gender, beliefs, sexual choices, age and other personal characteristics.

b. Definitions

• Diversity

People are diverse in several aspects: ethnic, religious, family, social origin, geographic or nationality, physical appearance, body, sex, gender identity, sexual orientation, education, age, ability, personality, work style, culture, belief system, among many other characteristics.

Diversity is generated by combining several of these factors that give people identity and make us unique.

Looking from the diversity approach implies valuing the differences and skills of each individual.

• Inclusion

Inclusion is the result of all the actions, attitudes, policies and initiatives - in this case - of an organization, to encourage incorporation and maintain a structure of diverse people.

c. Commitment to Diversity and Inclusion:

To follow the path of diversity and inclusion, it is indispensable to have the commitment of all. Therefore, we demand that third parties respect the principles set

out in this policy and act accordingly.

It is key that we all, including our Third Parties, commit ourselves to:

- Know, value and apply the definitions of diversity and inclusion.
- Treat all people with respect and dignity regardless of their personal characteristics.
- Actively listen to different points of view and encourage the participation of all opinions in discussions and decision making.
- Respect the diversity of talents, skills and experiences
- Promote inclusion and shared achievement.
- Create a climate of respect, trust and openness.
- Identify and discuss any situation that may be considered discriminatory or contrary to this policy.
- Actively promote a work environment that is free from harassment, abuse or abusive behavior, whether physical, verbal or psychological, that creates an intimidating, offensive or hostile work environment.
- Not tolerate situations of discrimination or abuse.
- Share our concerns and report irregular situations with the assurance that Profertil does not tolerate retaliation.

2. Money laundering prevention

- a. Money laundering and the financing of illicit activities at the international level consists, as an activity, of concealing the proceeds of criminal or illicit activity from the authorities of each jurisdiction.

In doing so, the launderer strips the assets of their illegality and brings them into the mainstream of the licit economy, so that they can be enjoyed or used again in other activities, whether licit or illicit. Profertil has developed a policy both to prevent this type of activity and to identify suspicious activity. And to know our customers, suppliers and financial institutions with whom we work.

- b. The Know Your Customer policy of Profertil will be an indispensable condition to start or continue the commercial or contractual relationship with it.

This relationship must be based on knowledge of the customers/suppliers, paying special attention to their operation or evolution (as the case may be), for the purpose of preventing money laundering or financing of terrorism.

A file will be created for each customer/supplier and due diligence will be applied according to the assigned risk.

- c. Profertil shall not accept as a Client/Supplier anyone with information suggesting that it may be related to activities of a criminal nature; or who carries on business of a nature that makes it impossible to verify the legitimacy of the activities or the origin of the funds; or who refuses to provide the documentation required to justify the legal origin

of its funds.

- d. Any information that reveals the existence of an operation without economic or legal justification, regardless of whether it was an attempted operation, or one effectively carried out in isolation or repeatedly; or which is not related to the economic, financial, equity or tax profile of the Client/Supplier; or that departs from market practices in terms of frequency, regularity, amount, complexity, nature and/or particular characteristics; it is essential that all the necessary mechanisms be put in place to discern the true nature of the operation, since it could be a suspicious money laundering operation.
- e. If the verifications carried out do not succeed in clarifying the true nature of the operation, the relevance of making a Suspicious Operation Report (SOR) to your immediate superior will be assessed. Otherwise, when the operation is justified, it will be filed.

3. Prevention of fraud and corruption

- a. Profertil S.A. requires that any person hired or remunerated to represent or act on behalf of or for Profertil S.A. employees, customers, contractors and their agents, subcontractors, sub-consultants, suppliers of services or inputs and any other associated personnel or organization, observe the highest ethical standards during the Hiring/Sales process and the performance of contracts to which Profertil S.A. is a party.
- b. The following is absolutely forbidden:
 - **Corrupt practice**
The act of giving, offering, receiving or soliciting advantages, not necessarily of a financial nature, which may take the form of a payment, gift, loan, remuneration or reward, for the purpose of improperly influencing the performance of another person's duties.
 - **Fraudulent practice**
Any corrupt, dishonest or false act; any lack of or concealment of information; any abuse of authority linked to the position or any form of deception, committed, in each case, with the intention of obtaining a profit (both for personal benefit and for the company), avoiding an obligation or causing a loss (or running the risk of a loss) to a third party, including theft.
 - **Coercive practice**
Any undue influence or threat to harm, directly or indirectly a person, his/her property or to influence inappropriately his or her actions.

- **Obstruction practice:**

Any destruction, falsification, alteration or deliberate concealment of material evidence relating to an investigation or providing false testimony to investigators to materially hinder an investigation by Profertil S.A. regarding allegations of corrupt, fraudulent, coercive or collusive practices and/or the threat, persecution or intimidation of any person to prevent that person from disclosing what he knows about matters relevant to the investigation.
- c. If it is detected that any Third Party has participated, directly or indirectly, in corrupt, fraudulent, collusive, coercive or obstructive practices, the General Management will be informed of the fact, and depending on the seriousness of the event, will decide the steps to be taken and whether a detailed investigation is required to analyze the event.
- d. Third Parties must report concerns or non-compliance on this matter as soon as possible, acting in accordance with the Third Party Code.
- e. Where a detailed investigation is appropriate, it will be carried out by the Ethics Committee.
- f. Particular attention will be paid to the need for protection or access to security measures for Third Parties reporting actual or suspected bribery or fraud, members of the investigation team and employees closely associated with the collection of information. Profertil S.A. will not tolerate retaliation against anyone who makes a legitimate complaint or cooperates with the investigation of a corrupt, fraudulent, collusive, coercive or obstructive practice or other issue of an ethical nature.
- g. The actions to be taken (including termination of the contractual relationship and legal action, where appropriate) for any properly investigated and documented bribery or fraud will be determined by the Management involved or the General Management, also with the assistance of legal counsel.
- h. As a prerequisite to the commencement of the contractual relationship with Profertil S.A: as agents, consultants, contractors, advisors and customers, whose capacity to represent it is established or implied in the terms of the agreement they have signed, the Third Parties must accept and sign the General Conditions of Purchase and Contracting/Sale.
- i. In the contracts in which Profertil S.A. is a signing party, it will require that the clients, contractors and their agents, subcontractors, subconsultants, service providers or input suppliers, and any other associated personnel, adhere to perform their business under ethical principles, complying with the local or international legislation applicable in each case. This point will be implemented through the signing by the Third Parties involved of the General Conditions of Purchase and Contracting/Sale of Profertil S.A.

4. Use of computer resources

- a. Third parties that use the Company's IT and technological resources must use them in an appropriate manner, respecting what is defined in this document.
- b. Computer resources are understood to be any component of technological hardware or software that is the property of the Company. For example: desktop computers, notebooks, cell phones, landlines, printers, among others.
- c. The computer and technological resources, electronic communications systems and all communications and data transmitted by received from or stored in the Systems of Profertil S.A: are the property of the Company and as such, are intended to be used exclusively for the activities of the Company.
- d. PROFERTIL S.A. reserves the right to monitor and review any and all data and information contained in the equipment of end users and other electronic devices provided by the Company in order to ensure proper operational performance, as well as compliance with this policy; for this purpose it takes into account the national legislation in force and, in particular, with respect to the preservation of privacy.
- e. The Company also reserves the right to monitor or review the use that end users make of the Internet and email systems of Profertil S.A.
- f. Users should take all appropriate actions to prevent unauthorized access to the information contained in digital format in PROFERTIL. Passwords should be kept secure and accounts and/or user IDs should not be shared. Authorized users of each system are responsible for the security of their passwords and accounts. User accounts and email addresses and their passwords are personal and non-transferable and the user to whom they are issued is solely responsible for their use.
- g. In the event of a breach of this policy by personnel from contractor companies, the latter will be notified in order to proceed to deny the employee access to the aforementioned tools in the future without prejudice to the sanction that the employer, using its own powers, may consider adopting for its employee.

5. Application of sanctions

- a. Any violation or attempted violation of the guidelines set forth in these Policies, the Code of Ethical Conduct or any other regulations set forth and communicated by the Company shall be subject to the penalties or measures provided for in the corresponding contractual provisions.



II. Ethical conduct line

Any breach of this document may be reported anonymously, confidentially and securely through the Ethical Conduct Line.

The ways to communicate with the Ethical conduct line are the following:

- Toll free: 0-800-999-4636 (option 1 operator and option 2 recorded message)
- E-mail: reportes@resguarda.com
- Send your letter to RESGUARDA to 25 de Mayo 555, piso 13 (C1002ABK), C.A.B.A.
- Web site: www.resguarda.com (through this channel you could follow up on your report) <http://www.resguarda.com>
- Fax: 0800-999-4636, option 3

Under no circumstances will adverse action be taken against a person who makes an inquiry or who in good faith reports a possible illicit or abnormal situation which, in his or her opinion, deviates from the provisions of this Code, any law, regulation or internal company procedure.

UPDATE RECORD

Date	Update	Reviewed by		Approved by
		Name	Position	Board of Directors