



El Catuaí Company Code of Conduct

Introduction

At El Catuaí, coffee is more than a product—it is our legacy, nurtured over generations of shade-grown, organic cultivation. Each bean carries the care, tradition, and knowledge of those who have worked our farms before us. We honor this heritage while embracing innovation, research, and internationally recognized sustainability standards to ensure our coffee continues to reflect excellence and responsibility.

This Code of Conduct is a guide for all employees, managers, and directors of El Catuaí. It reflects the standards of behavior, professionalism, and integrity we expect from everyone in our company. It underscores our duty to protect our heritage, uphold the dignity and well-being of our workers, foster sustainability, and meet the expectations of our customers, certification bodies, regulators, and local communities.

1. Certifications, Licensing, and Standards Compliance

1.1 Current Certifications

El Catuaí maintains a robust portfolio of organic certifications that reflect our commitment to sustainability, quality, and international best practices. Our operations are certified by **OCIA International (Organic Crop Improvement Association)**, which verifies our adherence to rigorous organic standards from farm to export. We are also certified under the **Japanese Agricultural Standard (JAS)**, which ensures that our coffee meets strict quality and safety requirements for the Japanese market. Additionally, we hold **EU Organic (ECOCERT) certification**, which includes equivalence with the **USDA National Organic Program (NOP)**, demonstrating that our coffee complies with internationally recognized organic regulations.

To further expand our global reach and recognition, we are actively pursuing **MAYACERT certification**, which will enable us to access new markets while reinforcing our credibility with international buyers and certification bodies. Maintaining these certifications requires ongoing audits, meticulous record-keeping, and continuous improvements in our farming, processing, and traceability practices. They are not merely credentials—they are a reflection of our dedication to integrity, transparency, and sustainable coffee production.

1.2 Alignment with International Standards

Beyond formal certifications, El Catuaí aligns its operations with internationally recognized standards and principles that guide ethical, sustainable, and responsible practices. We follow the **IFOAM Organic Principles of Health, Ecology, Fairness, and Care**, which provide a holistic framework for organic agriculture that prioritizes the well-being of people, communities, and the environment.



Our standards are further reinforced through compliance with **USDA NOP**, **Fairtrade Coffee Standards**, and **Rainforest Alliance/UTZ 2020 SAS**, which ensure that our products meet stringent environmental, social, and economic criteria. In addition, our farms and processing facilities comply with **GLOBALG.A.P. standards**, including the GRASP (Social Practices) and SPRING (Sustainability) add-ons, to uphold responsible agricultural practices.

To safeguard food safety and traceability, we adhere to **ISO 22000 (Food Safety Management)** and **ISO 22005 (Traceability Design)**, ensuring every batch of coffee can be traced from seed to cup. Finally, our operations are benchmarked against the **GCP Coffee Sustainability Reference Code (2021)**, demonstrating that El Catuaí meets international expectations for sustainable, transparent, and ethical coffee production.

1.3 Licensing and Legal Obligations

El Catuaí maintains all necessary **national licenses**, including environmental and processing permits issued by **MARN**, as well as export-related approvals from **ANACAFÉ**, **AGEXPORT**, and the **VUPE system**. These licenses ensure that every aspect of our operations complies with Guatemalan law and industry regulations, providing transparency, accountability, and legal certainty to our employees, partners, and customers.

Maintaining these licenses involves regular inspections, updates to operational procedures, and active engagement with regulatory authorities. It demonstrates our ongoing commitment to conducting business responsibly while protecting natural resources, worker welfare, and community interests.

1.4 European Union Regulatory Compliance

As a supplier to European markets, El Catuaí rigorously adheres to EU regulations to ensure that our coffee meets all environmental, social, and legal standards. We comply with the **European Deforestation Regulation (EUDR)**, which guarantees that all coffee

exports are deforestation-free, geolocation mapped, and accompanied by **Due Diligence Statements** for each lot.

Our reporting and transparency obligations are further strengthened by compliance with the **Corporate Sustainability Reporting Directive (CSRD)**, which requires us to provide detailed and verifiable sustainability reports for all operations. Additionally, the **Corporate Sustainability Due Diligence Directive (CSDDD)** ensures that we actively manage human rights, environmental, and climate-related risks, integrating due diligence into every aspect of production, processing, and export. These measures reflect our commitment to global accountability and responsible business practices.

1.5 Certification Integrity

Certification integrity is a responsibility shared across all levels of El Catuaí. Every employee and manager must ensure that certifications remain valid, accurate, and fully compliant with regulatory and market requirements. Maintaining integrity involves timely reporting of any



potential lapses, proactive audits, accurate documentation, and continuous improvement of our processes.

For El Catuaí, certifications are not just formalities—they are a demonstration of our ethical standards, our dedication to sustainable practices, and our promise to our customers, communities, and the environment.

2. Human Rights and Labor Practices

2.1 Respect for International Conventions

At El Catuaí, we uphold the highest standards of human rights and labor practices. We strictly adhere to the **International Labour Organization (ILO) Core Conventions**, ensuring that our operations are free from child labor, forced labor, and bonded labor. Discrimination of any kind—based on gender, age, ethnicity, religion, disability, or political beliefs—is unequivocally prohibited. Every member of our team, from field workers to management, is expected to respect and protect the dignity of colleagues and community members alike. These principles are embedded in our daily operations, audits, and training programs, reinforcing our commitment to ethical and responsible labor practices.

2.2 Fair Wages and Employment Terms

We believe that fair compensation is the foundation of a respectful and motivated workforce. All employees receive **living wages** that reflect the local cost of living and recognize their skills and contributions. Employment terms are formalized through **written contracts** in a language that employees fully understand. These contracts clearly outline rights, responsibilities, working hours, benefits, and other essential employment conditions. By maintaining transparency in all employment agreements, we foster trust, accountability, and mutual respect between the company and its employees.

2.3 Health, Safety, and Well-being

The safety and well-being of our employees is a top priority. El Catuaí provides **personal protective equipment** appropriate to each task, access to **safe drinking water**, hygienic sanitation facilities, and, where applicable, safe housing for staff. Emergency preparedness protocols are in place to respond to accidents, natural disasters, or health emergencies, and employees have access to medical care and support. Health and safety training is continuous, ensuring that all team members are aware of risks, safe practices, and procedures to maintain a secure working environment.

Beyond physical safety, we also emphasize mental and emotional well-being, promoting a workplace culture that values respect, support, and open communication.



2.4 Freedom of Association

El Catuaí recognizes that employees have the fundamental right to **freely associate**, form unions, elect representatives, and engage in collective bargaining. These rights are protected without fear of retaliation or discrimination. We actively encourage dialogue between workers and management to ensure that concerns, suggestions, and grievances can be addressed collaboratively and constructively. This freedom strengthens trust, empowers employees, and fosters a cooperative workplace culture that benefits both staff and company operations.

2.5 Diversity and Equal Opportunity

We are committed to creating an inclusive workplace where **diversity is respected and celebrated**. Women, youth, and members of marginalized groups are provided with equal opportunities to participate, contribute, and advance in leadership and decision-making roles. Programs to support career development, skill-building, and empowerment are actively implemented, helping all employees reach their full potential. By promoting equity and inclusivity, we not only strengthen our workforce but also reinforce our company's social responsibility and ethical foundations.

2.6 Training and Capacity Building

Continuous learning and professional development are central to El Catuaí's values. All staff receive **ongoing training** in organic farming practices, sustainable production, safety protocols, workplace ethics, and leadership development. These programs equip employees with the skills and knowledge needed to perform their roles effectively, advance their careers, and contribute to the overall success of the company. By fostering a culture of growth and learning, we ensure that our workforce remains knowledgeable, motivated, and aligned with our mission of sustainability, quality, and ethical practices.

3. Sustainability in Production

3.1 Organic Integrity

At El Catuaí, the foundation of our production is unwavering commitment to organic integrity. We strictly prohibit the use of **synthetic fertilizers, chemical pesticides, and genetically modified organisms (GMOs)**, ensuring that every step of coffee cultivation honors the environment and human health. Innovation is central to our approach: all new methods for **natural crop protection and soil enrichment** are carefully researched, tested, and submitted for organic certification approval before implementation. This process ensures that our farms remain fully compliant with international organic standards while advancing sustainable agriculture.

3.2 Biocontrol and Natural Management

Pest and disease management at El Catuaí relies entirely on **ecological and natural methods**, such as biocontrol agents, companion planting, and cultural practices that preserve ecosystem balance. These interventions comply fully with organic certification standards, and every action is meticulously documented to maintain **traceability** and transparency. This approach not only



protects the coffee crop but also safeguards the broader environment and biodiversity on our farms.

3.3 Soil and Water Stewardship

Healthy soil and clean water are essential to sustainable coffee production. We perform **annual soil analyses** and continuously monitor rivers, springs, and irrigation systems to assess both **physicochemical and microbiological quality**. Natural wells and lagoons support irrigation and processing needs, while nearby communities benefit from safe and reliable water access. We also maintain **local irrigation channels**, preserving regional water resources and ensuring that water management practices are environmentally responsible and socially beneficial.

3.4 Agroforestry and Biodiversity

Our coffee is cultivated within **shade-grown systems**, complemented by forests registered under INAB. This approach fosters rich biodiversity, creating habitats for native flora and fauna and promoting ecosystem resilience. Biodiversity is actively monitored and reported at **El Paraíso and La Concha farms**, with comprehensive data used to guide management decisions, preserve natural resources, and maintain ecosystem health.

3.5 Reforestation

El Catuaí is deeply committed to reforestation and forest renewal. Over the past three years, we have planted **236,482 coffee and shade trees**, with ongoing efforts to expand tree cover and restore degraded areas. These programs support soil fertility, enhance biodiversity, sequester carbon, and maintain the natural balance of our farms, ensuring that our coffee production leaves a positive environmental legacy.

3.6 Buffer Zones

To protect organic integrity, we maintain **50-meter buffer zones** around sensitive areas. Any plots that have been exposed to contamination undergo a **three- to five-year re-incubation process** before they can regain organic status. These measures safeguard the quality of our coffee, maintain certification standards, and demonstrate our commitment to rigorous, responsible agricultural practices.

3.7 Waste and Resource Management

Resource efficiency and circularity are central to our operations. Coffee pulp and other organic by-products are **composted**, contributing to soil fertility and reducing waste. Recyclable materials are **repurposed**, and **single-use plastics are systematically eliminated** from our operations. Through these practices, we minimize environmental impact and ensure that our production aligns with both sustainability goals and regulatory requirements.

3.8 Climate Action

El Catuaí actively addresses climate change by minimizing **greenhouse gas emissions**. We implement renewable energy solutions where possible, adopt energy efficiency measures, and continuously evaluate our operations to reduce environmental impact. These efforts are part of



a broader commitment to carbon responsibility and long-term environmental stewardship, ensuring that our farms remain resilient in a changing climate.

3.9 Research and Innovation

Sustainability at El Catuaí is strengthened by the combination of **traditional practices and modern scientific research**. We continuously explore innovative methods to improve soil health, water management, pest control, and crop productivity while ensuring full compliance with organic and international certifications. This integration of heritage and innovation enables us to remain resilient, competitive, and true to our mission of producing high-quality, environmentally responsible coffee.

4. Sustainability in Processing and Export

4.1 Licensing and Compliance

All processing operations at El Catuaí are fully **licensed by MARN**, ensuring compliance with Guatemala's environmental and food safety regulations. In addition, our operations are monitored by **ANACAFÉ, AGEXPORT, and the VUPE export system**, which oversee quality standards, traceability, and adherence to both national and international regulations. These licenses and oversight mechanisms guarantee that our processing activities are transparent, legally compliant, and accountable, reflecting our commitment to operational excellence and regulatory integrity.

4.2 Certified Processing Facilities

Both our **wet and dry mills** maintain **full organic certification**, which safeguards the integrity of our coffee throughout post-harvest processing. Every step—from de-pulping and fermentation to drying and storage—is carefully monitored to preserve organic standards, maintain quality, and prevent contamination. Our commitment to certified processing ensures that El Catuaí coffee remains authentic, traceable, and fully compliant with international organic requirements.

4.3 Water Management in Processing

Water is a critical resource in coffee processing, and at El Catuaí, it is managed with the highest environmental and community standards. **Honey waters** and fermentation effluents are treated using **beneficial microorganisms**, such as Terra Bioss, to reduce environmental impact and maintain ecological balance. **Lagoons and natural springs** are carefully monitored and maintained to prevent contamination and to support **safe water access for surrounding communities**, demonstrating our commitment to responsible resource management and community stewardship.

4.4 Packaging and Food Safety

El Catuaí coffee is exported in **jute sacks lined with Ecotact liners**, which are **MOSH/MOAH-free** and fully compliant with **SGS Eco-Product and EFSA standards**. This ensures that our



packaging maintains product safety, preserves quality, and meets international food safety requirements. We select packaging solutions that are environmentally responsible, reinforcing our broader commitment to sustainability and minimal ecological impact.

4.5 Traceability Systems

Maintaining full traceability is a cornerstone of our operations. Our processing and export systems are **ISO 22005-compliant**, allowing us to trace every coffee lot back to its farm of origin. Detailed records are maintained for **at least five years**, enabling audits, certification verification, and verification of sustainability and ethical sourcing. Traceability ensures transparency for our customers, partners, and certification bodies, strengthening trust and confidence in El Catuaí coffee.

4.6 European Market Compliance

All coffee destined for the European market meets stringent regulatory requirements. Exports are **deforestation-free, geolocation mapped**, and accompanied by **Due Diligence Statements** that confirm environmental compliance and ethical sourcing. These measures align with EU regulations, including the **European Deforestation Regulation (EUDR)**, and reinforce our commitment to responsible, traceable, and sustainable supply chains.

4.7 Low-Carbon Logistics and Circularity

El Catuaí actively reduces the carbon footprint of its supply chain. We **prioritize carbon-neutral carriers** for transportation and logistics wherever possible and adopt **recyclable, compostable, or reusable packaging** solutions to minimize waste. Circularity and resource efficiency are integral to our operations, ensuring that our export processes contribute positively to environmental sustainability while meeting international standards for responsible trade.

5. Community Engagement and Social Responsibility

5.1 Respectful Working Environment

At El Catuaí, we recognize that a safe, inclusive, and respectful workplace is fundamental to both employee well-being and high-quality coffee production. We foster a culture that values dignity, fairness, and mutual respect in every interaction. To support mental and emotional health, we offer **wellness programs**, counseling services, and stress management initiatives. In addition, **transparent grievance mechanisms** ensure that employees can raise concerns or report issues confidentially, with prompt and fair resolution. This approach creates a supportive environment where all team members feel heard, valued, and empowered to contribute their best work.

5.2 Employee Empowerment

We believe that empowered employees are essential to the success of our company. Staff at El Catuaí are provided with **opportunities to develop their skills** in areas such as sustainability, leadership, technical expertise, and organic farming practices. Employees are encouraged to



actively participate in **decision-making processes**, offering insights and ideas that improve operational efficiency, sustainability practices, and workplace culture. By nurturing talent and promoting shared ownership, we cultivate a workforce that is engaged, confident, and aligned with our mission of producing sustainable, high-quality coffee.

5.3 Community Contributions

El Catuaí's commitment extends beyond our farms to the **communities where we operate**. We provide essential support to workers, including **housing, meals, and transportation**, ensuring that their basic needs are met. At La Concha, we maintain a **school, church, and football stadium** that are open to the community, fostering education, recreation, and social cohesion. Additionally, we ensure **clean water access** to surrounding towns and villages, demonstrating our commitment to improving public health and community well-being. These contributions reflect our philosophy that the success of our coffee is intertwined with the prosperity of the people who grow, process, and enjoy it.

5.4 Healthcare and Education

We actively support long-term community development through comprehensive **healthcare and educational initiatives**. Preventive healthcare programs and medical access ensure that employees and their families can maintain good health. Education is supported through **scholarships, training programs, and capacity-building initiatives**, providing youth and community members with opportunities to learn, grow, and pursue careers in sustainable agriculture and beyond. These efforts strengthen the local workforce, empower future leaders, and reinforce our commitment to social responsibility.

5.5 Cultural Respect and Heritage

El Catuaí is deeply committed to **preserving indigenous traditions and cultural heritage**. Our development projects and operational expansions are designed to respect local customs, maintain historical patrimony, and ensure that community identity is not compromised by growth or modernization. By honoring the cultural richness of the regions where we operate, we strengthen relationships with local communities and uphold our role as a responsible steward of both land and heritage.

5.6 Farmer Engagement

The empowerment of farmers is central to our social responsibility approach. We provide comprehensive **training in organic practices, traceability, and certification**, ensuring that farmers not only improve the quality and sustainability of their coffee but also benefit from **shared certification premiums**. Special attention is given to **engaging women and youth**, encouraging active participation in leadership, farm management, and decision-making processes. By equipping farmers with knowledge, resources, and opportunities, we create resilient, sustainable agricultural communities that thrive alongside El Catuaí's growth.



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6. Business Integrity

6.1 Honesty and Transparency

At El Catuaí, honesty and transparency are foundational to our business operations. All **records, certifications, reports, and documentation** must be accurate, complete, and

auditable at any time. Employees and management are expected to provide clear, truthful information in all internal and external communications, ensuring that stakeholders—including customers, certification bodies, and regulators—can trust the integrity of our data. Transparency is embedded in our decision-making processes, operational reporting, and sustainability disclosures, reflecting our commitment to accountability and ethical conduct.

6.2 Traceability

Traceability is a cornerstone of responsible coffee production. Employees are responsible for **protecting and maintaining ISO 22005-compliant traceability systems**, ensuring that every lot of coffee can be traced from farm to export. Detailed records of production, processing, and transport are maintained for verification and auditing purposes. This robust traceability system guarantees **product integrity, certification compliance, and accountability**, strengthening the trust of our customers and partners worldwide.

6.3 Anti-Corruption

El Catuaí maintains a **zero-tolerance policy toward bribery, fraud, collusion, or any form of corrupt practices**. We strictly comply with international laws, including the **U.S. Foreign Corrupt Practices Act (FCPA)**, the **UK Bribery Act**, and other relevant anti-corruption standards. Employees are expected to act with integrity in all interactions, avoiding conflicts of interest and ensuring that all business dealings are fair, transparent, and legally compliant. Any suspected violations are reported immediately and investigated thoroughly to preserve the company's reputation and ethical standards.

6.4 Confidentiality

We are committed to protecting sensitive information related to the company, suppliers, and employees. All **personal, commercial, and operational data** are handled in accordance with **GDPR** and other applicable data protection laws. Employees are required to maintain confidentiality in all professional contexts, preventing unauthorized access, disclosure, or misuse of information. This commitment ensures the privacy of stakeholders and the security of our business operations.

6.5 Ethical Marketing

Marketing and communications at El Catuaí are conducted with integrity and respect for sustainability standards. **Certification claims and logos** may only be used with valid authorization and in compliance with certification rules. All promotional materials must be truthful, clear, and transparent, accurately representing the quality, origin, and sustainability of our coffee. By upholding ethical marketing practices, we reinforce the credibility of our brand and the trust of customers and partners worldwide.



6.6 Whistleblowing

El Catuaí provides **confidential channels** for employees to report unethical behavior, safety concerns, or non-compliance issues without fear of retaliation. Reports are treated seriously, investigated promptly, and resolved in a fair and transparent manner. Retaliation against whistleblowers is strictly prohibited, reinforcing a workplace culture where integrity is protected, valued, and actively promoted.

6.7 Continuous Development of Integrity

Maintaining a culture of integrity requires continuous education and reinforcement. All staff receive **regular training in ethics, anti-corruption, traceability, and responsible business conduct**, aligned with **OECD Guidelines for Multinational Enterprises**, the **UN Global Compact Principles**, and **Rainforest Alliance Assurance Requirements**. This ongoing development ensures that employees remain knowledgeable, vigilant, and empowered to uphold El Catuaí's high standards of honesty, transparency, and ethical leadership.

7. Management Responsibilities

7.1 Leadership by Example

At El Catuaí, managers are expected to **lead with integrity, professionalism, and a commitment to sustainability**. Leadership is not only about directing operations—it is about modeling the behavior, values, and ethical standards that the company expects from every employee. By making decisions that reflect honesty, transparency, and respect for both people and the environment, managers inspire their teams to adopt the same principles, fostering a workplace culture rooted in trust, accountability, and shared responsibility.

7.2 Certification Oversight

Managers hold a critical role in maintaining **the validity, compliance, and integrity of all certifications**. This includes overseeing internal and external audits, ensuring that documentation is complete and accurate, and proactively addressing any gaps or risks in certification compliance. By taking responsibility for these standards, managers protect the company's credibility, guarantee adherence to international organic and sustainability standards, and reinforce El Catuaí's reputation as a trusted supplier of high-quality coffee.

7.3 Performance Monitoring

Effective management at El Catuaí involves **continuous performance monitoring and reporting**. Sustainability metrics—including environmental impact, social responsibility initiatives, and operational efficiency—are systematically collected and reported in compliance with frameworks such as the **Corporate Sustainability Reporting Directive (CSRD)** and other relevant industry standards. This data-driven approach ensures that the company can measure progress, identify opportunities for improvement, and maintain accountability to employees, customers, certification bodies, and communities.

7.4 Corrective Measures

Managers are responsible for addressing **non-compliance or performance issues swiftly, transparently, and effectively**. When issues are identified, corrective actions are implemented according to established protocols, ensuring that risks are mitigated and standards are restored.



This includes follow-up audits, employee training, process improvements, and documentation of outcomes. By handling issues decisively and fairly, management reinforces a culture of accountability and continuous improvement throughout the organization.

7.5 Integration of Heritage and Innovation

Leadership at El Catuaí must **balance respect for our coffee patrimony and traditional practices with research-driven innovation**. Strategic decisions are guided by both our commitment to cultural and environmental stewardship and our pursuit of sustainable, efficient, and competitive practices. Managers ensure that heritage is preserved in every aspect of production and community engagement, while innovations—such as new organic farming techniques, resource management methods, and technology adoption—are thoughtfully integrated to strengthen resilience, quality, and market competitiveness.

8. Continuous Improvement

8.1 Staff Training and Development

El Catuaí invests in the ongoing **training and professional development of all employees** to ensure that our workforce remains knowledgeable, skilled, and aligned with the company's sustainability goals. Annual training sessions cover topics such as **organic farming practices, environmental stewardship, workplace ethics, and health and safety protocols**.

Leadership and management development programs are also offered to equip employees with the skills necessary to take on greater responsibilities, make informed decisions, and contribute to the company's long-term mission. By fostering continuous learning, we empower our team to grow alongside El Catuaí, enhancing both individual and organizational performance.

8.2 Sustainability Goals

We establish clear, measurable objectives to guide our environmental and social initiatives. These goals include **reducing carbon emissions, conserving biodiversity, improving water stewardship, and increasing energy efficiency** across all operations. Progress is monitored regularly through key performance indicators and documented in compliance with sustainability reporting standards. By setting ambitious yet achievable targets, El Catuaí ensures that sustainability is embedded into daily operations, strategic planning, and decision-making processes.

8.3 Research Partnerships

El Catuaí actively collaborates with **universities, non-governmental organizations, research institutions, and certification bodies** to validate new organic methods and strengthen the resilience of our farms. These partnerships allow us to integrate scientific research with traditional knowledge, improve crop yields sustainably, and adapt to emerging environmental and regulatory challenges. Through these collaborations, we remain at the forefront of innovation in organic coffee production while ensuring that our practices are scientifically sound and fully compliant with international standards.



8.4 Innovation and Heritage

We prioritize a balanced approach that **honors traditional coffee cultivation practices while embracing modern innovations**. New organic methods, technologies, and formulations are rigorously tested and submitted for certification before being implemented on our farms, ensuring both compliance and effectiveness. Simultaneously, we safeguard our cultural heritage and the knowledge passed down through generations, preserving the integrity and authenticity of El Catuaí coffee. This integration of heritage and innovation strengthens farm resilience, enhances quality, and supports sustainable growth.

8.5 Benchmarking

To maintain a competitive and progressive approach to sustainable coffee production, El Catuaí regularly **benchmarks its practices against international leaders and industry best practices**. This includes evaluating environmental management, social responsibility programs, organic farming techniques, and supply chain transparency. Benchmarking allows us to identify areas for improvement, adopt innovative solutions, and ensure that our practices consistently meet or exceed global sustainability standards. Through this process, El Catuaí remains a leader in responsible, high-quality coffee production.

9. Enforcement and Accountability

9.1 Obligation to Comply

At El Catuaí, adherence to the **Company Code of Conduct is mandatory for all employees, managers, and directors**. Compliance is not optional—it is a fundamental responsibility that underpins the company's reputation, ethical standards, and operational integrity. Every individual is expected to understand, respect, and integrate the principles outlined in this Code into their daily actions, decisions, and interactions. Upholding these standards ensures that our operations remain legally compliant, socially responsible, and aligned with El Catuaí's commitment to sustainability, heritage, and excellence.

9.2 Disciplinary Action

Violations of the Code of Conduct are taken seriously and may result in **disciplinary measures** that correspond to the severity and nature of the infraction. These measures range from retraining and corrective guidance to formal warnings, suspension, or termination of employment in cases of serious breaches. Disciplinary actions are implemented fairly, consistently, and transparently, ensuring that accountability is maintained without compromising due process. This framework reinforces a culture of responsibility, integrity, and ethical behavior throughout the organization.

9.3 Confidential Reporting

El Catuaí provides employees with **confidential and anonymous channels** to report suspected violations of the Code of Conduct, unethical behavior, or safety concerns. These reporting mechanisms are designed to protect the identity of whistleblowers and encourage open communication without fear of retaliation. Employees are assured that all reports will be



treated with seriousness, discretion, and impartiality, creating a secure environment where concerns can be raised safely and responsibly.

9.4 Corrective Follow-Up

Management is responsible for ensuring that **all reported issues are thoroughly investigated, addressed, and resolved** in a timely manner. Investigations are conducted with transparency and fairness, and findings are documented systematically to maintain accountability and compliance. Corrective actions are implemented to prevent recurrence, improve processes, and reinforce adherence to the Code of Conduct. By actively following up on reports, management demonstrates El Catuai's commitment to ethical governance, operational integrity, and continuous improvement.

Employee Acknowledgment

By signing below, employees affirm their commitment to uphold El Catuai's values of heritage, organic integrity, sustainability, water stewardship, certified production, continuous innovation, worker dignity, and social responsibility.

Employee Name: _____
Position: _____
Signature: _____
Date: _____