



POLICY FRAMEWORK.

This document has been stipulated, which compiles the information of the guidelines with which MAVALLE S.A.S. is committed to its compliance.

MAVALLE S.A.S. develops its activities in full compliance with the regulatory framework of the Colombian legal system, which includes adherence to international laws on human rights, labour, land use, and the environment applicable to the national territory.

Commitment to Human Rights:

MAVALLE S.A.S. committed to the respect and promotion of human rights and the UN Guiding Principles on Business and Human Rights (UNGP); for this reason in the development of its business purpose, interpersonal relationships of its employees, contractors, and community in the area of influence, assumes as corporate principles and values, respect and compliance with the Universal Charter of Human Rights and its protocols, conventions and binding covenants, including the provisions of the Political Constitution of Colombia, by avoiding causing or contributing to adverse human rights impacts and preventing or mitigating any harm linked to company operations.

Establishing and maintaining a company grievance mechanism (consistent with UNGP effectiveness criteria) to receive complaints and remedy adverse impacts they have caused due to production and sourcing.

Mavalle S.A.S. is committed to:

Mavalle S.A.S is committed to upholding applicable labour rights and labour laws in the jurisdictions where operating, the UN Guiding Principles on Business and Human Rights, and the intent of the International Labor Organization's eight core conventions. The safeguards apply to all workers, including contract, temporary and migrant workers. This includes:

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Non-discrimination. (ILO Convention No. 111 and No. 100)

Avoid discrimination and practices that violate the dignity of people; employees have the right to enjoy a dignified working environment. Where equal opportunities are provided in access to work and professional promotion, ensuring at all times the absence of discrimination based on sex, race, age, religion, origin, marital status, sexual orientation or social status. Likewise, the company is committed to maintaining a work environment free of harassment, abuse, intimidation, or violence.

Rejection of forced labor (ILO Convention No. 29 and its 2014 Protocol) and child labour exploitation. (ILO Convention No. 138 and No. 182)

MAVALLE S.A.S. rejects the use of any form of forced or compulsory labor. Likewise, it rejects child labor and will only hire workers who have reached the age of majority regulated in Colombia or minors in accordance with the authorizations on the matter regulated by the Ministry of Labor or the Law of Childhood and Adolescence.

Respect freedom of association and collective bargaining. (ILO Convention No. 87 and No. 98)

MAVALLE S.A.S. recognizes the fundamental right of workers to form unions or representative bodies and to join them. It also guarantees respect for freedom of opinion, the exercise of union activity, collective bargaining and the protection afforded to workers' representatives, in accordance with Colombian labor legislation.

To offer dignified employment.

MAVALLE S.A.S. remunerates its collaborators in a dignified manner, adjusted to their training, experience, responsibilities and functions, in accordance with the applicable legislation and the socioeconomic context. Providing decent living wages.

Protect the health of employees.

MAVALLE S.A.S. guarantees the occupational health and safety of its employees in the workplace, prioritizing the permanent improvement of working conditions, complying with the established requirements and adopting the corresponding measures.

Guaranteeing rest.

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The Internal Work Regulations establish the working hours for each of the company's employees, respecting Colombian legislation regarding the maximum legal working day and establishing and respecting the mandatory breaks established by law.

In addition, Mavalle is committed to establishing and maintaining a company grievance mechanism (consistent with UNGP effectiveness criteria) to receive complaints and remedy adverse impacts they have caused due to production and sourcing. All interested parties (community, contractors, suppliers, and collaborators) have the right to make requests, complaints, claims and/or suggestions in a transparent manner. The processing and response is given in a timely, confidential and objective manner.

Respect, responsibility and communication with local communities and indigenous peoples (CL/PI).

MAVALLE S.A.S., recognizes the importance and protects of the surrounding indigenous peoples and the local community in the development of the company's economic activity, upholding traditional rights of access for hunting and gathering of animals and plants for the purpose of subsistence and indigenous cultural and religious traditions, customs and ceremonies; carrying out operations in accordance with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP); in turn, the social, economic, and environmental impact generated directly and indirectly is recognized. Therefore, timely, continuous, effective and culturally appropriate, dialogue channels are established to ensure transparency in operations

The development of productive and industrial activities ensures ongoing land tenure and access rights; Mavalle SAS develop these activities on own land. The implementation of new projects., this includes when planning, establishing restoring, or transforming corporate plantations and/or industrial sites, as well as associated infrastructure; is duly socialized with the local community, as well as with indigenous peoples; in cases that affect the rights of IP/LC over their lands, territories and resources, prior consultation is required to obtain free and informed consent; this consent may be withheld.

Mavalle SAS Adopt measures to provide remedy through mutually agreed procedures in cases where the company previously has caused or contributed to the appropriation

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of or harm to the lands, territories, or resources of IP/LC without securing FPIC. Implementation is jointly monitored by the community and the GPSNR member and/or by mutually agreed third party(ies).

The accepted methodologies to be followed for the FPIC process are:
UN-REDD (2012) Guidelines on Free, Prior and Informed Consent
- RSPO (2015) Free, Prior and Informed Consent for RSPO Members
- FAO (2015) Free, Prior and Informed Consent Manual

In the development of activities that impact CL/PI's land rights, territories, and resources, MAVALLE S.A.S. guarantees the implementation of compensation and reparation measures, which minimize the impact generated. The measures implemented are mutually agreed with CL/PI; these are supervised by the parties and by an agreed third party, evaluating compliance with the agreement, reflecting and described in the negotiated outcomes of the CL/PI process.

MAVALLE S.A.S. supports the decent living conditions of the local communities, through the development and implementation of social programs with employees, as well as with the surrounding communities, providing training and workshops on environmental, health, recreation and sports issues. In addition, employees have access to loans of study, housing, and free investment, this supporting the economic and cultural rights of the local people.

MAVALLE S.A.S. employees enjoy food subsidies and access to housing in camps to facilitate the development of their work.

Food security and sovereignty projects are developed with neighboring and local communities.

Anti-Bribery and Corruption Policy:

MAVALLE S.A.S., implements and applies the applicable anti-corruption regulations, including the Foreign Corrupt Practices Act FCPA, as well as the Colombian national regulations issued for corruption, extortion, and bribery.

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The policy adopted by MAVALLE S.A.S. is oriented to the non-acceptance or offer of any payment or promise of payment of money or object of value or benefit and utility, directly or indirectly; in order to receive favorable treatment, obtain or retain business and/or any undue advantage or purpose.

Donations, gifts, and invitations are accepted as long as they are not intended to influence decision making. For this purpose, supporting documents must be available and the respective accounting must be kept. Donations are made for charitable purposes and only to authorized charitable entities.

The relationship with customers, suppliers, third parties and employees implies compliance with these guidelines, as well as those related to the management of money laundering and financing of terrorism.

Environmental Commitment. - Environmental Policy:

Mavalle S.A.S. guarantees sustainability in economic and social development, protecting the environment through the management of environmental aspects and impacts so that future generations do not see their resources compromised.

MAVALLE S.A.S., in the development of its productive activity, complies with the provisions, environmental laws and applicable requirements.

The application framework involves all processes, agricultural - plantations, industrial - processing plant, and other administrative areas.

MAVALLE S.A.S. is committed to minimize and mitigate carbon emissions through more than 10,000 hectares of natural rubber forests, with a total of approximately 5,550,000 trees, which contribute significantly to climate change mitigation due to their capacity to capture and fix atmospheric carbon dioxide (CO₂).

We support long-term protection of natural forests and other ecosystems and their conservation values and restoring or supporting restoration of deforested and degraded rubber landscapes.

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The plantations were developed on the company's own land, which is not classified as protected, peat, or restricted-use areas.

For sourcing from third parties, there is a commitment to avoid developed natural rubber plantations on peat, regardless of depth, extent, or status (wet, drained or dry).

MAVALLE S.A.S commits to producing and sourcing natural rubber in a way that does not contribute to deforestation or degrade High Conservation Values (HCVs). Identification and management of areas for development and conservation follow the methodology and guidance consistent with the HCV Approach and with the High Carbon Stock Approach (HCSA). Natural rubber from areas deforested or where HCVs have been degraded after the cutoff date of 1 April 2019 is non-conforming with this policy element.

In the activities of planting, cultivation, conservation and exploitation of natural rubber plantations, no deforestation or fire practices are carried out. We commit to not using open burning/fire in new or ongoing operations for land preparation, land management, waste management, or any other reason other than in justified and documented cases of fire break establishment, waste management for sanitary reasons where public garbage collection is not available, phytosanitary, and other emergencies.

Instead, MAVALLE S.A.S., as a contribution to the environment, develops processes of planting and replanting native trees of the region on its own land, as well as on the banks of rivers in the region, contributing to the recovery of soils and water sources. Initiative aligned with our commitment to protecting water quantity and quality, preventing water contamination from agricultural and industrial chemicals, and preventing erosion and sedimentation, as well as the related to commit to protecting soil quality, preventing erosion, nutrient degradation, subsidence and contamination

Given the climatic conditions of the area, a Forest Fire Risk Plan has been established, which is directed and socialized to MAVALLE S.A.S. employees and neighboring communities in order to have knowledge of rapid and timely reaction in case of fire occurrence, as well as to reduce the impact of these, preventing them from reaching disaster or calamity levels.

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MAVALLE S.A.S. Manages operations to maximize natural resources efficiency, through the following initiatives

Waste management:

Correct, timely separation and proper disposal of waste. Full identification and treatment is carried out according to: Ordinary Waste, Hazardous Waste, and Usable Waste.

Protection of flora and fauna:

Mavalle's natural rubber forests, as well as the region's native forests, serve as habitat and refuge for multiple species of fauna; initiatives such as no hunting and no logging are aimed at preserving these species. This reaffirms our commitment to protecting wildlife, including rare, threatened, endangered and critically endangered species from poaching, over-hunting and habitat loss in areas under company management and supporting wildlife protection activities in areas of influence.

Efficient use of water:

MAVALLE S.A.S. implements actions aimed at the rational use of water resources, through the use of recirculated water, subway water wells, among other initiatives. Water consumption is approved by the environmental agency CORMACARENA, and water consumption is recorded in all processes in which water is consumed, in order to be within the quantities approved by the environmental agency. In the industrial area, low water consumption equipment is used. In addition, environmental awareness campaigns have been established.

Efficient use of energy:

In favor of managing operations to minimize the rate of energy use, Mavalle implements actions oriented to the efficient use of energy, taking monthly and semiannual measurements of the energy levels used in all productive, industrial and residential areas of the company, such levels are in accordance with those approved by the competent entities; the registration and monitoring allows to have a control and implement the corresponding corrections to make an adequate and rational use of the energy resource.

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Natural rubber supply policy:

The development of Mavalle's productive activity is carried out mainly through the supply of natural rubber from its own plantations and, to a lesser extent, from third party suppliers. Mavalle requires that natural rubber supplied by third parties including smallholders, complies with quality standards, for which the suppliers are accompanied by supporting training to improve yield and quality.

Mavalle is committed to socialize the implementation of this policy, and to communicate with natural rubber suppliers the need to develop their productive activity within a framework of sustainability and aligned with the commitments described throughout this document. By active and regular dialogue, suppliers receive information and have the opportunity to make comments and suggestions related to the fulfillment of the commitments. Likewise, Mavalle provides the necessary support in the efforts of suppliers and multi-stakeholder to be aligned with this policy at the landscape, jurisdictional or other spatial level; In the same way, it communicates to all suppliers of natural rubber that material produced and processed in accordance and conformance with this policy framework will be preferred.

Third-party suppliers of natural rubber are traceable in order to evaluate alignment and compliance with the policy framework. In instances of supplier non-conformance with this develop time-bound implementation plans to move towards conformance and/or remediation or past or ongoing harms. Based on the results of the review, the continuity of the commercial relationship with the natural rubber supplier is determined. Natural rubber suppliers are duly identified and characterized by mapping the supply chain; a social and environmental risk assessment is made in order to prioritize risk mitigation actions and to be aligned with this policy framework.

Traceability will be performed at a minimum to an appropriate jurisdictional level, to know or control the conformance of purchased materials with this Policy Framework. The level of traceability will differ for each "node" of the supply chain and will be documented, with justification for why the desired level of traceability may not be reached for all supply chains and plans to achieve this level.

The appropriate jurisdictional level will be defined in the implementation guidance.

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Mavalle regularly commits to third party suppliers of natural rubber to support their compliance with the company's commitments through effective incentives, support mechanisms and purchase monitoring systems.

Policy direction and follow up:

In addition to this policy, Mavalle, as a subsidiary of Corficolombiana, is aligned with the Sustainability Management System implemented by the matrix company; these guidelines govern Mavalle's actions and decision making, which are in accordance with this policy.

Mavalle setting public, timebound and geographic-specific targets and milestones with their associated indicators/metrics for applying its commitments.

Additionally, Mavalle integrates the commitments into the decision-making processes, systems and performance metrics of the company's management, the relevant business units, and the relevant business units and company affiliates and subsidiaries.

Management strategies are aligned with this policy framework, and the objectives and commitments are made public to all stakeholders, including natural rubber suppliers.

Therefore, Mavalle regularly monitoring progress toward company commitments in order to ascertain performance.

Also, Mavalle apply monitoring systems and practices to incorporate crowd-sourced information from local stakeholders and affected parties regarding non-conformance with commitments. Information sources may be informal or formal.

Annually, Corficolombiana publishes the management and sustainability report of the business units and subsidiaries, including Mavalle, through which progress and outcomes towards the commitments of compliance with this policy is supervised.

Mavalle publicly reports on progress and results related to the fulfillment of policy commitments at least once a year.

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