

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

P-SEG-PTEE-01

1. SCOPE

Plastitec has defined and implemented the following Anti-Bribery and Anti-Corruption Policy, which must be applied by all employees, administrators, partners, suppliers, and contractors knowing and complying with it at all times.

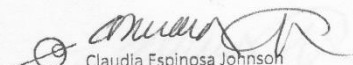
2. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

We are committed to preventing bribery and any other corrupt practice. This is why we conduct our business in an ethical, transparent, and honest manner strictly complying with the regulations applying to us and good practices in the subject. We have implemented a Transparency and Business Ethics Program (TBEP).

We promote a culture of zero tolerance for bribery and any other corrupt practice that violates our institutional values.

By virtue of the foregoing, the following guidelines are defined:

- In order to prevent and control bribery and corruption, we periodically carry out an analysis, measurement, and control of these risks, as well as train our employees in the Transparency and Business Ethics Program promoting ethical and transparent acting in the development of their work within the company.
- Interactions with authorities or control entities of the Colombian state or any other State on behalf of the company will be framed within the regulatory provisions, and will always be cordial and respectful. In the event that their decisions are contrary to the interests of the company, they will be treated under the legal mechanisms defined by the applicable regulations in each country refraining from exerting any type of undue pressure.
- Under no circumstances may employees direct or through intermediaries offer, promise, agree, or grant favors, payments, attentions, or gifts to national or foreign authorities, their relatives or third parties related to them with the intention of influencing their actions, decisions, omissions, or tasks of their official positions or to obtain undue advantages.
- All mechanisms and controls have been defined and implemented to guarantee that employees, contractors, and suppliers know and comply with the responsibilities



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and procedures related to the prevention of bribery and other corrupt practices in the same way the consequences and sanctions in case of non-compliance with these.

- We will adequately and timely know the people with whom we have a contractual legal relationship of any nature, for which reason we carry out due diligence processes for suppliers and contractors at the time of starting the relationship and during the commercial relationship.
- A compliance officer has been appointed who has the suitability and experience to permanently monitor and supervise, verify effective, efficient, and timely compliance with the Transparency and Business Ethics Program adopting corrective measures and necessary updates, among other tasks.

3. COMPLAINT CHANNELS

The channel provided for employees, partners, suppliers, and contractors, and the general public to make complaints about acts of bribery and/or corruption is email denuncia.confidencial@plastitec-sa.com. This is a confidential and anonymous mechanism through which you can report any act of bribery and/or corruption, and the people involved in it.

In any case, we will guarantee that the identity of the complainant, if established, along with the information and evidence provided in the complaint will be kept confidential.

4. CONSEQUENCES AND SANCTIONS

Failure to comply with the policy herein is deemed a violation of the employment agreement (employees) or commercial agreement (suppliers and contractors). Therefore, the respective sanctions will be applied, which may even imply the termination of the employment or commercial relationship. You could also incur in fines, administrative, or criminal sanctions.

5. ANNEX

If any counterparty requires the policy hereof in another language, please request it by mail:

j.seguridad@plastitec-sa.com

The preceding is a true and complete translation into English of an original document written in Spanish, in my view.
END OF OFFICIAL TRANSLATION No. JA 22-3897
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