



CODE OF ETHICS AND CONDUCT

G.GG.03

23 JANUARY, 2023

Version No. 5

Living Our Values



OPERATIONAL EXCELLENCE • CREATIVITY
GRIT • RESPONSIBILITY • PASSION

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1. INTRODUCTION



This Code establishes the principles, rules and policies that will guide the behavior and activities of all the members of PLASTICOS ESPECIALES S.A. S, the objective is the development of an ethical culture, avoiding situations that may present a conflict of interest, ensuring compliance with current legal standards and especially those aimed at the prevention and detection of money laundering and terrorist financing, compliance with human rights included in the Universal Declaration, ETI Base Code (Ethical Trading Initiative – ETI) , and in general determining the guidelines for good conduct, both in relation to its employees and its related parties through any kind of legal relationship, including suppliers, contractors, customers, unions, government and community; In such a way that those involved at all levels have a guide for action in their work, which serves as a framework for decision making, and constitutes a guideline for all persons and stakeholders involved.

Likewise, this Code seeks to direct the necessary efforts to exercise control in all operations and businesses in charge, ensuring compliance with the methods defined so that the culture of self-control and self-management is radiated throughout the organization, aimed at achieving the mission, vision and strengthen the values of PLASTICOS ESPECIALES S.A.S.

Failure to comply with the provisions of this Code, as well as the rules that modify or add to it, is a serious offense, so it will result in sanctions for employees and may be decisive in deciding with whom to establish civil or commercial relations. All employees have the obligation to report in a timely manner to the Compliance Officer and the Human Resources Manager about any case known of non-compliance with this Code or the current legal standards by any member and / or linked to PLASTICOS ESPECIALES S.A.S.

For its interpretation or application, in case of doubt should be read in harmony and in conjunction with other policies and regulations in force or adopted by PLASTICOS ESPECIALES S.A.S. that regulate relations with its stakeholders, such as, but not limited to Personnel Policies, Internal Labor Regulations, Employment Contracts, Commercial Agreements, Civil or Commercial Contracts, Regulations or Manuals of Conduct or Good Practices, among others.

A printed copy or by e-mail through the account etica.pe@plasticel.com will be delivered at the time of entry to each employee who is part of PLASTICOS ESPECIALES S.A.S, and with the signature of the receipt of such copy, the employee accepts that it is his obligation to know, understand and abide by this Code in its entirety. Additionally, to make it known to the general public, it will be published in the official media of the company.

2. OUR PLASTICEL CULTURE



2.1 OUR PURPOSE, MISSION AND VISION

PURPOSE

At PLASTICEL we develop packaging that contributes to the sustainability and success of our customers.

MISSION

That is why we provide innovative, convenient and safe solutions.

VISION

To be recognized as the most reliable supplier in the markets we serve.

2.2 OUR VALUES



OPERATIONAL EXCELLENCE:

We seek continuous improvement of our processes. We work to be world-class employees in pursuit of best practices.



PASSION:

We devote ourselves to our work with passion, energy and commitment.



CREATIVITY:

We explore different ways and means to do our work and solve challenges. We love to learn and be at the forefront.



RESPONSIBILITY:

We act in a transparent, integrated and ethical manner with our customers, suppliers and colleagues, complying with established agreements and respecting company policies.



GRIT:

We do not give up easily, we meet challenges by overcoming obstacles with courage, persistence and discipline.

3. SCOPE OF APPLICATION OF THE CODE OF ETHICS



This Code applies to all shareholders, directors, employees, suppliers, customers and others related to PLASTICOS ESPECIALES S.A.S. who must develop their activities in accordance with the provisions of this Code, being responsible for their compliance.

4. CONCEPT OF ETHICS

Ethics is the set of principles, customs and values elevated to the category of moral standards, which make coexistence possible within a society.

4.1 DEFINITION OF CONFLICT OF INTEREST

The actions of employees and all related persons, must be executed with loyalty, therefore, may not enter into or execute, directly or indirectly, by themselves, or by interposed persons, business or actions in general that, according to good business customs, are contrary to the interests of PLASTICOS ESPECIALES S.A.S.

Employees must act always attending to the success of the activities and business of PLASTICOS ESPECIALES S.A.S., refraining from participating by themselves or through an intermediary person in personal interest or third parties, in activities involving competition with PLASTICOS ESPECIALES S.A.S., avoiding any conflict with their personal interests, for their own benefit or third parties. Employees will act with loyalty and good faith and with the diligence of a good business person, always putting the interests of the Company before personal interests.

4.2 CONFLICT OF INTEREST POLICY [R.RH.52 DECLARACION CONFLICTOS DE INTERES](#)

There is a conflict of interest when it is not possible the simultaneous satisfaction of two interests, namely, the self-interest of the employee and the interest of PLASTICOS ESPECIALES S.A.S. either because the interest of the employee or the third party that benefits, which undermines the interests of PLASTICOS ESPECIALES S.A.S.

PLASTICOS ESPECIALES S.A.S. employees are committed to act under the highest ethical standards in relations and negotiations with suppliers, contractors and customers, therefore, constitute potential conflict of interest scenarios:

- ✓ Receiving and granting personal benefits and/or perks, for their family or third parties.
- ✓ Employees, spouses, children, parents or siblings who are suppliers or beneficiaries of goods and/or services of the Company, directly or through third parties and/or companies in which the employees have shareholding, management or command control, except with the express prior authorization of the Assembly of Shareholders of the Company, who shall provide in writing the mechanisms to maintain absolute transparency in the relationship



- ✓ The spouses, permanent partners, children and/or parents of PLASTICOS ESPECIALES S.A.S. employees, who work in companies that are competitors of the aforementioned company, and in case of working in companies that are competitors, must report such condition in the Declaration of Conflict-of-Interest Form.
- ✓ Provide to third parties with whom PLASTICOS ESPECIALES S.A.S. competes or negotiates, information of any nature concerning PLASTICOS ESPECIALES S.A.S., such as policies, plans, formulations, patents, applications, programs, business strategies, economic results, bids, book prices of materials or equipment, or any data that is not generally known to the public.
- ✓ Any actual or potential conflict of interest situation must be reported immediately by the employee to the immediate supervisor, with a copy to the Compliance Officer and Human Resources Management, who will decide on the actual existence of the conflict and the steps to be taken.
- ✓ Doubts regarding the configuration of a conflict of interest do not exempt the employee from the obligation to refrain from participating in the respective activities and must immediately inform the Immediate Supervisor, Compliance Officer or Human Resources Manager.

At least once a year, the Compliance Officer and the Human Resources Manager shall inform the General Management of the conflicts of interest affecting the company, if any, and how each of these events was resolved, if any.

All employees must sign the declaration of conflict of interest, in the event of employees linked by Temporary Service Company (EST) or Outsourcing service, also be required to sign a document generated by its employee that covers the interests of PLASTICOS ESPECIALES S.A.S. and that is in accordance with the provisions of this document, therefore the document signed between the employee and the Temporary Service Company (EST) or Outsourcing service must be approved by the legal area of the company, in each of these events, in order to verify that it covers the legal terms that are required by this company.

Likewise, the Human Management area must verify that the document signed Declaration of Conflict of Interest, rests in the folder of each of the employees directly linked and require employees of Temporary Service Companies (EST) or independent contractors, that the subscription of the aforementioned statement for employees who provide services to PLASTICOS ESPECIALES S.A.S. is made.



The employees linked to the commercial process of PLASTICOS ESPECIALES S.A.S. must carry out this process in an ethical manner, in accordance with the corporate values.

4.4. GIVING OR RECEIVING GIFTS FROM THIRD PARTIES

PLASTICOS ESPECIALES S.A.S., develops with its suppliers and contractors, a relationship of reciprocal respect, seeking stable, timely and beneficial business relationships for the parties involved.

PROHIBITIONS:

- ✓ It is forbidden for employees to request or receive from their suppliers or contractors, for themselves, family members or third parties, any kind of gratuities, commissions, gifts, invitations, attentions, loans or perks.
- ✓ Employees are prohibited from obtaining for themselves, their family or third parties, benefits derived from this business relationship, including gifts or invitations that compromise their independence.
- ✓ Employees are prohibited from giving, offering or promising a national or foreign public servant, suppliers and/or contractors, directly or indirectly, sums of money, any object of pecuniary value or any other benefit or utility, in exchange for the national or foreign public servant, suppliers and/or contractors performing, omitting, expediting or delaying any act related to the exercise of their functions and in connection with a national and/or international business or transaction.

The Purchasing Department shall warn suppliers of goods and services, including contractors, financial entities, consultants and advisors of any kind, of this prohibition.

EXCEPTIONS:

The employee may receive:

- ✓ Gifts of token value, such as calendars, business diaries, promotional pens, with a maximum equivalent of COP\$50,000
- ✓ Invitations and entertainment associated with work, such as lunches, business meetings outside the facilities, with prior approval of General Management.
- ✓ Discounts and special rates offered to all employees, for example, taking advantage of corporate rates of hotels, airlines and car rental companies.
- ✓ If a gift is received that does not fit the above, it will be delivered to Human Resources, who will dispose of it in a raffle or award that benefits the members of the company.

4.5 REMUNERATION TO CONTRACTORS AND THIRD PARTIES



Employees should not contract with third parties, if they have doubts about their ethical behavior, considering that they could pay bribes on behalf of PLASTICOS ESPECIALES S.A.S.

Employees must ensure that no contractor will offer, request or receive inappropriate payments on behalf of PLASTICOS ESPECIALES S.A.S.; in case of evidence of this, they must notify the Head of the Internal Control Department and/or the Human Resources Management to take the necessary measures.

All fees and expenses paid to contractors must represent an appropriate and justifiable remuneration for the legitimate services to be provided and must be paid directly to them.

In the event that there are doubts and concerns about whether or not contractors represent a risk of corruption and, if they represent a risk, what steps should be taken to address those risks, the employee must consult his or her direct supervisor by e-mail with a copy to the Human Resources Management, who in turn must consult the concern with the Compliance Officer and/or the Human Resources Management, who in turn, if deemed necessary, will refer the matter to the Ethics Committee.

4.6 PROCEDURE FOR HANDLING FIXED FUNDS, PETTY CASH, TRAVEL EXPENSES AND CORPORATE CREDIT CARDS

[IT.GG.02 Manejo de Fondos Fijos](#)

Expenses for entertainment activities, lodging, travel, per diems, etc.

Expenses generated by these activities must adhere to the provisions of the Procedure for Fixed Funds Management, Petty Cash, Travel Expenses and Corporate Credit Card, which is an integral part of this Code

4.7 POLITICAL CONTRIBUTIONS

Employees shall be free to intervene in non-working hours in political activities of their choice. Their participation either with money, time or property, must be a purely personal matter and in nothing can interfere PLASTICOS ESPECIALES S.A.S.

Employees must refrain from any practice of internal political proselytism.

Any kind of financial contribution for political and / or philanthropic purposes with funds of PLASTICOS ESPECIALES S.A.S.; will be a power reserved exclusively to the Assembly of Shareholders of the organization.



4.8 DONATIONS

PLASTICOS ESPECIALES S.A.S. may make donations to duly constituted legal entities, always within the framework of what is permitted by law, which will be formalized by written agreement and will be granted with an altruistic purpose, i.e. without expecting any direct consideration. This limitation does not include direct or indirect benefits established by law that the donor may receive, such as tax benefits.

The donations made may not be given for the personal benefit of employees or employees of the recipients, nor may constitute an incentive for the recommendation, purchase, supply or sales of products of PLASTICOS ESPECIALES S.A.S.

5. OWNERSHIP OF DEVELOPMENTS, PROCESSES, TECHNOLOGICAL, SCIENTIFIC, ADMINISTRATIVE AND SYSTEM DEVELOPMENTS AND IMPROVEMENTS.

Are owned by PLASTICOS ESPECIALES S.A.S., developments, discoveries, inventions and / or process improvements, technological, scientific, administrative and systems, unless otherwise expressly provided by law, therefore, intellectual property rights, including but not limited to copyright and industrial property on any creation, discovery, scientific invention, conception or design; either computer programs, or the creation or improvement of any industrial application process, as well as ideas, studies, creations, parts and others that have been made, developed, supplemented and / or created by the employee during the employment relationship, are the property of PLASTICOS ESPECIALES S.A.S. All of the above will be transferred according to law to PLASTICOS ESPECIALES S.A.S.; without any restriction or limitation for use, marketing, exploitation, unlimited repetition, disclosure in any media, known or to be known during the maximum legal term provided by the current rules governing the matter, either in Colombia or abroad. In all cases, all employees must keep confidential developments, processes, data, documents and any information related to their functions and / or PLASTICOS ESPECIALES S.A.S., whatever its nature, to which he has had or may have had access. In any case, to publish, reproduce, use or disseminate any information, you must obtain the prior written approval of the legal representative of the company. In this way, the employee shall take the necessary measures to ensure, under his responsibility, the secrecy and confidentiality of the documents and information mentioned above.



The inventions, discoveries or improvements, made by the employees in the exercise of their functions or on the occasion of them, during the validity of their labor contract does not oblige the payment of any compensation in their favor other than the salary allowance indicated in the corresponding individual labor contract.

The obligations stipulated herein shall subsist in the head of the employee, indefinitely in time, even if the legal relationship has ended, regardless of the cause and/or form of termination.

5.1 USE OF PLASTICEL'S ASSETS

[IT.ST.01: Utilización de Medios Tecnológicos, R.ST.05: Acta de Entrega de Celulares; R.ST.03: Acta de Entrega Equipos de Cómputo.](#)

The use of assets of PLASTICOS ESPECIALES S.A.S. assets, services and in general, resources and materials must be used by its employees exclusively for the purpose for which they were delivered for the benefit of the full performance of their duties, which requires to avoid any improper use, in merit of it the systems areas must generate the corresponding document which will reflect the delivery of computer equipment, mobile telephony and in general any element of ICT, document to be sent to Human Management, for storage in the employee's work history.

When the equipment is returned either by termination of employment or for any other reason such as replacements, the employee must deliver the equipment that was assigned to the area of Information Technology and Communications - ICT, which must verify the condition of the same; in order to initiate the investigation of the case or the corresponding disciplinary processes, if required.

In any case the employee who uses for other purposes the tools and or equipment supplied shall be liable to PLASTICOS ESPECIALES S.A.S. and to third parties for any loss or economic, property, reputational damage that could have generated such conduct, the Internal Control area of the company will perform random checks in order to detect that the controls of delivery and use of equipment and tools referred to herein are advanced by the competent area. Likewise, security tests, inspections and controls will be carried out, being of full knowledge of the stakeholders that in the company the controls will be carried out by means of video cameras and similar means, which allow the physical security of the facilities, as well as of the people who are inside it.

5.2 CORPORATE FRAUD



Employees must strictly comply with the legal norms that regulate the activities related to their business, in order to conduct their business in an ethical, transparent and honest manner. All employees are obliged to comply with the laws, provisions and regulations issued by the authorities, as well as the policies and procedures established in this Code of Ethics and Conduct.

All employees must observe transparency and ethical principles in relations with customers, contractors, suppliers and investors; knowledge of the market, reporting suspicious transactions, preservation of documents and timely attention to the requirements of authorities, complying with the rules on bribery, prevention and control of money laundering and terrorist financing, issued by the Superintendency of Corporations and Finance, the DIAN (National Tax and Customs Directorate) and other competent agencies.

PLASTICOS ESPECIALES S.A.S. is committed to full cooperation with all authorities and requires that its employees are equally committed.

5.3 ANTI-FRAUD POLICY

PLASTICOS ESPECIALES S.A.S., does not accept any conduct constituting fraud either against itself or against third parties, this prohibition extends to social security entities or third parties with which PLASTICOS ESPECIALES S.A.S., develop the ordinary course of business, therefore, any person engaged in conduct constituting fraud may be criminally denounced.

Any employee who participates in fraud will be dismissed with just cause. In case of fraud, decisions become the responsibility of Human Resources, Internal Control will be notified of these processes and must document the cases in order to propose early warning and management measures in these events.

5.4 SAGRILAFT AND ANTI-BRIBERY PROCEDURE

[P.GG.02: Política para la prevención del Lavado de Activos y Financiación del Terrorismo.](#)
[M.GG.07:Manual Sagrilajt- Antisoborno](#)

PLASTICOS ESPECIALES S.A.S. shall refrain from carrying out operations with third parties whose resources come from illegal activities, especially those associated with Money Laundering and Terrorist Financing, for which they shall adopt due diligence procedures for the knowledge of their counterparties following, if applicable, the provisions of the rules on prevention, control and risk management of money laundering, terrorism and/or terrorist financing and bribery that are applicable to them. The company's Internal Control Department and the Compliance Officer shall be responsible for ensuring compliance with the policies and procedures associated with these issues.



The Compliance Officer and the Internal Control Department shall verify:

- ✓ Completion of the Declaration of Sources of Legitimate Funds: request to third parties with whom PLASTICOS ESPECIALES S.A.S. has business relationships.
- ✓ The signature of the statement: P.GG.02 - Policy for the prevention of Money Laundering and Terrorist Financing.
- ✓ Validate that companies, suppliers, customers and third parties are not involved in sanctions for corruption, money laundering, national or transnational bribery or other similar fraudulent offenses.
- ✓ Shall monitor compliance with applicable provisions on the prevention of corruption, money laundering and financing of terrorism.

The Compliance Officer and the Internal Control Department shall act with due diligence, in order to have the full identity of the third parties and verify the information in databases or restrictive public lists available, being especially recommendable the binding lists for Colombia: United Nations Security Council List, OFAC lists and the Clinton list; likewise it is the responsibility of the Internal Control Department to carry out a periodic review of these aspects, whose purpose is to identify and assess the risks of national or transnational bribery that may affect PLASTICOS ESPECIALES S. A.S.. Additionally, it will validate its good credit and reputation.

If the Compliance Officer and / or the Internal Control Department of PLASTICOS ESPECIALES S.A.S. verifies that the statements set forth in this chapter made by third parties are false or inaccurate, it will generate alert and communicate to the Sagrilaft Committee for the corresponding investigation. For the duration of the investigation, commercial relations with the third party shall be suspended and if it is proven that there is a Sagrilaft risk, the existing commercial relationship shall be terminated and no transaction of any kind shall be carried out with the third party.

The Internal Control Department shall verify that the clauses of the commercial agreements that are implemented have clauses that allow for early termination in events in which there is evidence of violation of the policies referred to in this chapter, without this circumstance generating recognition and payment of damages.

5.5. SUPPLY CHAIN SECURITY



All PLASTICOS ESPECIALES S.A.S. employees and third parties involved in the national and international supply chain are obliged to prevent and report all situations that jeopardize the security of the supply chain, to ensure that no illegal activities are carried out, including money laundering, smuggling, drug trafficking, trafficking of substances for the processing of narcotics, terrorism, financing of terrorism and arms trafficking.

6. STAKEHOLDER RELATIONS

PLASTICOS ESPECIALES S.A.S. expects from its employees, customers, contractors, suppliers and other legal or natural persons with whom it has a relationship, compliance and respect for the laws, human rights, dignity and the principles of fairness and equal treatment.

6.1 EMPLOYEE RELATIONS

PLASTICOS ESPECIALES S.A.S. maintains with its employees a relationship of equity, respect and inclusion, under the framework of human rights and ETI Base Code (Ethical Trading Initiative – ETI), giving them the opportunity for a comprehensive development of their personal and professional skills, offering economic and personal stability through policies and procedures that provide remuneration, motivation, development and welfare under the framework of the values of the company, within a climate of respect and belonging.

Employees shall maintain a work environment that allows the execution of this policy through communication mechanisms, leadership and teamwork with their dependents, colleagues and superiors. Without exception, the actions of the employees shall be governed by compliance with Human Rights, ETI Base Code (Ethical Trading Initiative – ETI), fidelity, obedience, loyalty, honesty, exclusive dedication of their time, execution of the work contract under the principle of good faith and commitment in the performance of their duties, attitude of collaboration and sense of belonging, strengthening teamwork.

6.1.1 LABOR RELATIONS AND NON-DISCRIMINATION POLICY

The actions of PLASTICOS ESPECIALES S.A.S., in terms of personnel management must adhere to this policy and compliance with human rights and ETI Base Code (Ethical Trading Initiative – ETI), which expressly prohibits discrimination in the selection, hiring, promotion, development and termination of its employees.



PLASTICOS ESPECIALES S.A.S. has as a policy to guarantee the right of all employees and applicants to the following:

- **Employment is freely chosen.** There will be no involuntary or forced labor. Employees and / or applicants, will not have to leave in the custody of PLASTICOS ESPECIALES S.A.S. "deposits" or their identity documents and will be free to leave their employment.
- **Child labour shall not be used.** No children or young people under 18 will be employed for night work or in hazardous conditions.
- **No discrimination is practiced.** Equal treatment and employment opportunities, which does not discriminate on the basis of age, sex, color, race, social origin or condition, political or religious ideas, national origin, marital status, marital status, physical or mental disability, age, sexual orientation, gender identity, being a victim or being perceived as a victim of domestic violence or any other prohibition of law.
- The selection, hiring, promotion and development process is based on the candidate's merits, qualifications, skills and competencies to perform the relevant tasks required by the particular position.
- **Living wages are paid.** Fairly value and recognize the work of each person, offering salaries and benefits that are competitive for the environment.
- PLASTICOS ESPECIALES S.A.S., acts in compliance with the laws and regulations on labor legislation in force in relation to salary and working hours, including minimum wage, overtime, maximum hours and other grounds for compensation and will provide the benefits mandated by law.
- **No harsh or inhumane treatment is allowed.** Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- **Working hours are not excessive.** PLASTICOS ESPECIALES S.A.S. will appropriate working hours in accordance with national legislation and will maintain these guidelines regarding working hours in order to ensure a stable, safe and healthy workplace.
- **Regular employment is provided.** To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- **Freedom of association and the right to collective bargaining are respected.**



PLASTICOS ESPECIALES S.A.S. develops adequate practices in Human Rights and ETI Base Code (Ethical Trading Initiative – ETI) in all its business activities and is interested in promoting the improvement of social and labor conditions as a fundamental factor for sustainable development, does not tolerate or execute labor abuses.

All employees must be committed to compliance with this policy, taking into account that it is essential to establish and maintain relationships in the work environment that lead to the achievement of personal and company objectives, which is why the breach of any rule, parameter, procedure or policy enshrined in this Code of Ethics and Conduct, is classified as a serious offense under the terms of Article 7 of Decree 2351 of 1965, paragraph A, paragraph 6.

6.1.2 GENDER EQUALITY POLICY

PLASTICOS ESPECIALES S.A.S. is committed to the adoption of gender equality measures, combating discrimination, ensuring equal access to opportunities regardless of the gender of the employees who are part of the Company; therefore, it is a commitment that all personnel linked to the company is committed to respect and comply with good practices in the field of Human Rights and ETI Base Code (Ethical Trading Initiative – ETI).

The Human Resources area will also establish measures and mechanisms to prevent, address and punish any type of harassment that may occur due to the gender condition of the employees linked to the company, is committed to promote work environments free of violence and where the quality of personal life is favored, promoting the reconciliation of work, personal and family life.

The company's salary policies will not take into account the gender of its employees to determine the remuneration corresponding to the position, since only the technical and management skills, experience and factors inherent to their productivity, compliance with the responsibilities of the position and performance in the assigned functions will be taken into account, without the employee's gender being taken into account as a value at the time of setting their salaries, bonuses or other types of compensation. This policy is mandatory at all levels of the organization.

It is prohibited to engage in conduct that may be considered sexual harassment, harassment at work or any other kind of harassment within PLASTICOS ESPECIALES S.A.S., in the workplace or in the development of the company's activities.

For more information on Labor Harassment and other related behaviors, we have the Coexistence Committee that works regulating, documenting and preventing events of labor harassment. This instance generates training programs and prevention of workplace harassment, strengthening a culture in anticipation of events of this nature and creating strategies that involve all instances in the elimination of such behaviors.



PLASTICOS ESPECIALES S.A.S. offers opportunities for professional and personal development through training, education and promotion processes that allow employees who are part of the company to strengthen their skills and abilities, so that they have opportunities for professional, professional and personal growth.

- ✓ Conducts performance evaluations so that employees receive feedback on their work and indicators.
- ✓ Maintains the privacy of information related to employees, we respect and promote the right to privacy of individuals. To meet these objectives PLASTICOS ESPECIALES S.A.S. conforms to the following parameters:
 - a) Legal regulations in force regarding the protection of personal data and sensitive information.
 - b) Only uses personal data when there is legitimate authorization from the owner.
 - c) Verifies that the information processed is truthful, complete, accurate, updated, verifiable and understandable.
 - d) Guarantees the right of individuals to obtain information about their data in our databases, make corrections or revoke authorizations.
 - e) Has controlled access to personal information.
 - f) Is committed to prevent adulteration, loss, consultation, use or unauthorized access to personal information.
 - g) Encourages all personnel involved in the processing of personal data to sign the appropriate confidentiality agreements.

6.1.3 PROFESSIONAL DEVELOPMENT OPPORTUNITIES



PLASTICOS ESPECIALES S.A.S. offers opportunities for professional and personal development through training, education and promotion processes that allow employees who are part of the company to strengthen their skills and abilities, so that they have opportunities for professional, professional and personal growth.

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 - g) Encourages all personnel involved in the processing of personal data to sign the appropriate confidentiality agreements.

6.1.4 Employment of Relatives/Family members Policy

It is our philosophy to hire qualified talent and guarantee the same opportunities for access and promotion inside of the company to all its employees, we recognize that there will be situations in which this goal is achieved through the hiring of family members; for this reason, family members of employees may be hired as employees only if their selection is based on objective conditions and if this does not give rise to a conflict of interest.



In this regard, to avoid the generation of real or apparent conflicts of interest, the following situations shall not be allowed:

- a) Direct or indirect dependency and supervision between the employee and his or her family member: That one of the two employees has a position of responsibility for supervising, auditing, evaluating, or managing the performance of the other or exercising disciplinary power over the other.
- b) Place colleagues or co-workers, who have a family or partner connection in a subordinate relationship.
- c) Collaboration of two (2) or more employees who are relatives or family members inside the same area.
- d) Participating or influencing the selection or hiring of someone with whom you have a family relationship..
- e) Employees working in critical processes defined by the company may NOT have family members hired by the company and/or temporary company, due to the impact and risk to the security of the national and international supply chain. These processes will be established in the analysis of the process map in the Instructions IT.RH.19.
- f) Employees who occupy critical positions at the HIGH level may not have family members hired by the company and/or temporary company; as well as employees who occupy leadership positions (Directors, Managers, Chiefs, Coordinators, Leaders, among others). These positions are defined in the Critical Positions Matrix - R.RH.26.
- g) Family members may not be hired to occupy positions in critical areas and/or processes defined by the company; likewise, they may not occupy critical positions at a HIGH LEVEL
- h) It is not allowed to hire spouses or permanent partners

Family members up to the fourth (4th) degree of consanguinity, third, second and first degree of affinity, except spouse and/or permanent partner, shall be considered as family members.

It is the responsibility of the Ethics Committee and the Human Resources area to resolve any doubts that may arise from the Employment of Relatives Policy IT.RH.23; as well as to study and decide in each case on the viability of hiring a relative under any modality, whether there is a conflict of interest.

6.1.5 CONFLICT OF INTEREST RESOLUTION MECHANISMS



To resolve conflicts of interest arising between the Company and its employees, the rules established in the Internal Work Regulations of the company, in the law, in the employment contract and in relevant instructions from the Board of Directors or the General Management will be followed.

PLASTICOS ESPECIALES S.A.S. does not use or support the use of physical punishment, coercion, intimidation, or verbal abuse. PLASTICOS ESPECIALES S.A.S. employees who voluntarily or culpably, by action or omission violate the rules, policies or procedures, violate the ethical principles and standards enshrined in this Code, the corresponding actions will be taken, in accordance with the legal rules on labor, contractual and internal work regulations, as well as the provisions of this Code and other internal regulations of the company.

The irregularities committed may lead from the imposition of disciplinary sanctions to the termination with just cause of the employment relationship, as it is reiterated that any breach of the parameters, policies, procedures and rules set forth in this Code is considered a serious offense, in accordance with the procedure and scales of faults established in the Internal Labor Regulations. The foregoing, without prejudice to any civil or criminal legal actions that may arise, as mentioned in the employment contract in the confidentiality clause and in the Internal Regulations, Art. 59, numeral r.

In the course of investigations conducted by PLASTICOS ESPECIALES S.A.S. the right of defense and due process to the persons involved will be respected.

When a Manager finds that in the exercise of his duties may be faced with a conflict of interest, he shall immediately inform the other members of the Management Committee and shall in any case refrain from participating in the discussion and decision of the matter that generates the conflict-of-interest situation.

In the event that the majority of the Managers are in a situation that potentially presents a conflict of interest, the Management Committee shall abstain from carrying out the operation or entering into the act or contract that generates such situation, unless expressly authorized by the Chief Executive Officer.

When the person facing a conflict of interest is an employee of the company, he/she shall immediately report the situation in writing to his/her hierarchical superior, with a copy to the Compliance Officer and the Human Resources Management, who shall refer the case to the Ethics Committee, which shall decide on the actual existence or not of the conflict of interest and the steps to be taken to resolve the situation. If warranted, the situation will be presented to the General Management, in order to determine in each specific case, the way to avoid or solve this conflict.

6.1.6 OCCUPATIONAL HEALTH AND SAFETY



The company prioritizes the protection of life, health and safety of all its employees, contractors, suppliers, customers and visitors. The commitment in this regard is developed in accordance with the following guidelines:

- ✓ PLASTICOS ESPECIALES S.A.S. promotes responsible leadership and commitment to occupational health and safety at all levels of the organization.
- ✓ It is a commitment to management and prevention through the identification, evaluation and permanent control of risks associated with the company's processes; in order to provide a safe and hygienic work environment; as well as to implement the necessary measures to avoid work-related accidents and damage to health arising from work, leading to the declaration of occupational diseases, associated with it or occurring in the course of it, by reducing, to the extent reasonable, the causes of hazards inherent in the work environment.
- ✓ **Working conditions are safe and hygienic.** The strategies of the occupational health and safety area are aimed at strengthening the culture of prevention and self-care of occupational health and safety, providing that employees receive education and/or training in health and safety.
- ✓ Access to clean and hygienic restrooms and drinking water will be provided, as well as sanitary facilities for food storage.
- ✓ All employees are responsible for strict compliance with health and safety standards in order to protect themselves and other employees or third parties. Likewise, they must make responsible use of the Personal Protection Elements assigned to them when carrying out their tasks, including high-risk activities, and they shall disseminate knowledge among their colleagues and subordinates and promote compliance with risk protection practices.
- ✓ PLASTICOS ESPECIALES S.A.S. is committed to compliance with current legislation, internal procedures and commitments made by the organization in terms of safety and health at work.
- ✓ PLASTICOS ESPECIALES S.A.S. is committed to accident prevention activities derived from the driving of all types of vehicles, complying with current regulations on road safety, allocating the human, financial and technical resources necessary to comply with the Strategic Road Safety Plan.

The adoption and enforcement of this policy is mandatory at all levels of the organization including contractors, suppliers and visitors.

6.2 CUSTOMER RELATIONS



For PLASTICOS ESPECIALES S.A.S. is fundamental the quality and respect for its customers, it is a priority that the commercial transactions are governed by the postulates of good faith, honesty, speed and clarity for the parties. Employees must comply with the policies and procedures established for commercial relations and transactions of sales, credit, collections and customer service, to ensure customer loyalty and satisfaction.

The relationship and image that customers have of PLASTICOS ESPECIALES S.A.S. are essential, so the company maintains a relationship of deep respect for customers, providing products that meet their expectations and complying with current regulations.

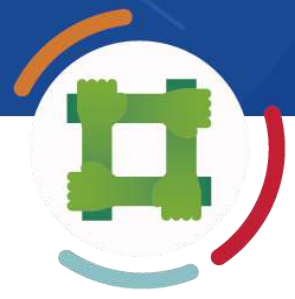
All communication with customers will be developed under the principle of respect, employees may not issue any statement about the specifications of the products of PLASTICOS ESPECIALES S.A.S., any communication in this regard will be issued only by the channels designated by the company expressly.

PLASTICOS ESPECIALES S.A.S. is committed to responsible marketing of its products, all communications to customers, including advertising on national television, cable, radio and print, online and digital advertising, among others, are governed by corporate values. PLASTICOS ESPECIALES S.A.S, provides innovative, convenient and safe packaging solutions that contribute to the sustainability, needs and requirements of our customers.

The marketing actions are carried out in a responsible, truthful and transparent manner, so that customers make decisions with the information of the case, this covers certificates, procedures, plans, projects, research, rates, plans, objects, techniques, designs, photographs, developments and all traditional means of disclosure as well as the means of new telecommunication technologies, use of licensed property, contests, promotions and areas related to privacy protection, electronic commerce and digital media. Our products will comply with the current legal regulations in Colombia and in each country where they are marketed.

6.3 RELATIONS WITH SUPPLIERS, CONTRACTORS AND THIRD PARTIES

In PLASTICOS ESPECIALES S.A.S. we work with suppliers who are committed in their actions according to the corporate values of this company. Relationships with suppliers, contractors and third parties are governed by the principles of trust, honesty and mutual respect, creating long-term relationships, these are committed to adopting compliance with the fundamental principles of the Global Compact on Human Rights, ETI Base Code (Ethical Trading Initiative – ETI), Labor Standards, Environment, Sagriflact and Anti-Corruption.



Suppliers, contractors and third parties commit to operate with integrity, respecting the law and avoiding bribery and fraudulent practices, complying with tax requirements, legislation against money laundering or other assets and the financing of terrorism, respecting and promoting intellectual property.

No transactions of purchase or sale of products or services will be made with legal or natural persons who have illicit businesses, who have had or have pending matters with the justice system or who in any way have indications or are presumed to be or have been involved in illicit activities. PLASTICOS ESPECIALES S.A.S. resources shall not be used to pay, directly or indirectly, to representatives of public, private or mixed entities, in order to achieve business or special favors. No employee may give bribes, payments or gifts to third parties, whether or not there is an intention to influence them. In the performance of their duties, employees must treat third parties fairly, loyally and on equal terms.

6.4 COMMUNITY RELATIONS

PLASTICOS ESPECIALES S.A.S. contributes to the protection of the environment, as well as to the harmonious and mutually beneficial coexistence with the communities where it operates.

6.4.1 Environment

PLASTICOS ESPECIALES S.A.S. will seek in its actions to respect the environment in which it operates. It will make efficient use of natural resources and its actions will be aimed at minimizing the impact of production processes on the environment and will make available to its employees the most appropriate means to do so. To this end, it will establish the best practices and promote among its employees the knowledge and use of these practices. PLASTICOS ESPECIALES S.A.S is committed to strict compliance with current environmental legislation.

6.4.2 Social Responsibility

PLASTICOS ESPECIALES S.A.S. is committed to acting in a socially responsible manner, in compliance with current legislation, in particular, assumes the responsibility to respect cultural diversity and the customs and principles in force among people and neighboring communities and to involve them if necessary, through constructive dialogue, in the development of strategies to ensure safety, health, environmental protection and efficient response to possible emergencies.

7. COMMUNICATION CHANNELS



REPORTS, COMPLAINTS AND/OR CLARIFICATIONS

Investors, employees, suppliers, customers and/or any interested party may alert and/or report to PLASTICOS ESPECIALES S.A.S. on breaches of the Code of Ethics or ethical issues. To do so, they have the following channels that facilitate the reporting of any situation that violates the provisions of this Code of Ethics and Conduct:



E-mail address

etica.pe@plasticel.com



Verbally

- ✓ Internal Control Chief
- ✓ Human Resources Management
- ✓ Immediate Chief

Reports or complaints will be escalated to the appropriate instances within the company, depending on the nature of the reported case.

When reporting a situation of non-compliance with the Code of Ethics, employees must do so in a clear and simple manner. The company will guarantee that they will not receive any type of retaliation for the information provided.

Likewise, reports may be submitted to the Ethics Committee through direct managers, who will forward them to the Compliance Officer, Human Resources Management and/or General Management, verbally or through the e-mail address indicated.

7.1 ETHICS COMMITTEE



PLASTICOS ESPECIALES S.A.S. will have an Ethics Committee formed by an odd number of members as follows:

1. Human Resources Manager.
2. Finance Director.
3. Internal Control Chief.

Note:

In the event that a complaint is received against one of the members of the Ethics Committee, or an employee who reports directly to them, he/she shall declare him/herself to be impeded and shall be replaced by the General Management. In the event that the General Management is not present or cannot participate, it may appoint a delegate.

Said Committee may resort to the opinion of the Legal Department when it considers that the complexity of the case so warrants.

The main functions of this Committee shall be:

- ✓ Update and monitor the application of the provisions of this Code.
- ✓ Determine the necessary actions for the dissemination of the Code, through different media and communication channels.
- ✓ Develop strategies to strengthen the standards of ethical conduct within the Company.
- ✓ Act as the highest authority for the resolution of conflicts of interest, establish whether privileged information has been misused, authorize gifts and invitations outside the guidelines defined in this Code and, in general, determine whether conduct contrary to corporate ethics has been incurred.
- ✓ Any others defined in internal policies and/or guidelines related to the ethical issues described in this document.

All employees must be fully aware of the Code of Ethics and Conduct, as well as the functioning of the Ethics Committee. Whistle-blowing covers, among other matters, non-compliance with Human Rights and ETI Base Code (Ethical Trading Initiative – ETI), reporting bribery and/or any other suspicious activity.



The application of retaliatory actions for reporting to the means provided by the company actions that violate the provisions of this Code, current legislation and other internal guidelines of the Company is prohibited. Therefore, if an employee receives a report related to a matter from the Ethics Committee, he/she must submit it to the Compliance Officer and/or Human Resources Management for registration and investigation without fear of retaliation, whether he/she identifies him/herself or requests confidentiality regarding his/her identity.

The Ethics Committee will investigate if a person reports that he/she has received any threat or recrimination for having made a report to the communication channels provided herein. Consequently, all employees of PLASTICOS ESPECIALES S.A.S. are obliged to cooperate with the investigations conducted or requested by the Ethics Committee. The lack of collaboration, the intentional omission of information or the provision of erroneous information must be evaluated in due time to determine the seriousness of the fact and will be sent to the Human Management for the corresponding disciplinary investigation.

Any employee who suspects illegal activities or activities contrary to the established rules and policies must report it as soon as possible.

The Company guarantees absolute confidentiality to employees who have submitted complaints or information regarding non-compliance with the rules established in the Code.

RAFAEL EMILIO ALJURE D.
C.E.O



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