

CONFLICT OF INTEREST POLICY

1. Objective

To establish general guidelines for the timely identification of situations that could lead to a conflict of interest, which will allow us to avoid damages to the company derived from decisions made by employees who may find themselves in a situation of conflict of interest.

2. Basis

It is in Alpek's general interest to encourage employees to perform their duties in an environment that always favors a spirit of honesty and transparency in and towards the company. Particularly in decision-making processes, Alpek expects loyalty and impartiality from its employees, always seeking to preserve the company's assets and its internal and external image.

3. Scope

This Policy applies to all Alpek employees and its Subsidiaries.

4. Definitions

4.1. Conflict of Interest

- A Conflict of Interest exists when the personal situation of an employee, due to the circumstances of their position, time, resources, or information, places them in a position where a decision they make on behalf of the company could benefit their personal interests and/or those of their family.
- A Conflict of Interest situation also exists when, due to a third party's relationship with an employee, the latter cannot fulfill their job responsibilities objectively, or when they make improper use of their position, authority, or influence in the company.
- Situations that are or could be considered Conflicts of Interest:
 - Being or having family shareholder(s) in companies that are competitors, suppliers, distributors, or customers of Alpek
 - Having family members who work in companies that are competitors, suppliers, distributors, or customers of Alpek and who, due to the function of their positions, could show preferences or limit objectivity in their responsibilities
 - Having family members who work in any of Alpek's companies where there is direct organizational dependence, or in any position related to their own, whose function is part of the same process in which they may show preferences and/or limit the adequate control of operations
 - Performing services with economic remuneration to competitors, suppliers, distributors, or customers of Alpek
 - Manufacturing, transforming, or marketing products and/or services that compete with the group's current or potential offerings
 - Having responsibilities to third parties or interests outside the company that are related to the performance of their duties
 - Receiving benefits or gifts from the same supplier, competitor, distributor, or customer on more than three occasions, in less than one year, or for values that are greater than \$100 USD per event (except for institutional events organized not exclusively for the employee)

4.2. Relatives

- For purposes of this policy, the following shall be considered:
 - Blood relatives in ascending, descending, or collateral line up to the fourth degree. Such as: grandparents, parents, children, grandchildren, siblings, aunts, uncles, cousins, and nieces and nephews.

- Relatives by affinity or in-law up to the fourth degree. This includes wife or husband, partner or cohabitant, brothers-in-law, sisters-in-law, sons-in-law, daughters-in-law, in-laws, close friends, godchildren, among others.

4.3. Employees

- Employees: All personnel hired under any work scheme employed by Alpek companies
- Employees of the following business areas, who have greater exposure to a conflict-of-interest situation:
 - Purchasing, Commercial, Logistics, Operations, Human Resources, Legal, Treasury, Credit, Collections, and Payments
 - Personnel who have a certain degree of influence in organizational changes, related to investment decisions, in the decision to buy and sell products, or interference in the contracting and/or allocation of goods and services

5. Guidelines

- 5.1. It is Alpek's policy to avoid any decision by Company employees that is or appears to be a Conflict of Interest.
- 5.2. When a situation of this nature arises or is presumed to exist, the employee must declare it to their superior and, at the superior's discretion, refrain from making decisions on their own, and hand them over to their immediate superior or to a competent third party who ensures the impartiality of the judgment.
- 5.3. Conflict of interest declarations of the company's personnel should be collected and kept up to date.
- 5.4. It is Alpek's policy to ensure that, in any case where there is a possible conflict of interest, it is investigated, evaluated, and resolved within a framework of fairness and respect for the rights of the employee and the company, and to adopt the applicable preventive or corrective actions.
- 5.5. Each Alpek business unit shall establish a Conflict of Interest Committee comprised of:
 - Immediate supervisor of the case involved
 - Area Executive at a higher level than the person involved
 - Human Capital Executive at a higher level than the person involved
 - Internal Audit Executive equal to or higher than the person involved

6. Procedure

- 6.1. Ensure that all new personnel joining the company are fully informed and committed to this Policy by signing a Conflict of Interest declaration in accordance with the Conflict of Interest Statement (Annex 1).
 - Update the Conflict of Interest Statement on a regular basis as follows:
 - Employees: every two years, or when a case of possible conflict of interest arises, which shall be valid in electronic or handwritten form
 - Employees in positions that have greater exposure to a conflict-of-interest situation: annually, or when there is a possible conflict of interest; in these cases, it is with a handwritten signature.
- 6.2. Maintain custody of Conflict of Interest declarations (Statements) in personnel files or electronically, as appropriate.
- 6.3. All possible cases of conflict of interest shall be analyzed, evaluated, documented, and resolved in no more than 30 days by a committee formed for this purpose, and the committee's resolution shall establish a deadline for its implementation. The committee will be coordinated by the Human Capital department and composed of various members, as described the Guidelines.

- 6.4. The result of any analysis and investigation process must be reported to the person involved, taking the corresponding actions and being duly documented and signed by the members of the Committee, attaching the employee's Statement.

7. Responsibilities

- 7.1. Of any Executive who has employees under their direct responsibility:

- Support the Human Capital department in the processes of dissemination of this policy, as well as in the signing of the Statement and its corresponding update.
- Continuously monitor the application and compliance of the same.
- Evaluate conflict of interest situations reported by employees, and in the event of an evident Conflict of Interest, report it to Human Capital.
- Assume the responsibilities and make the decisions that the positions of their direct employees require, in those cases in which there is a conflict of interest or the investigation of a possible conflict of interest is in process.
- Determine whether or not the employee can accept benefits or gifts that may generate a conflict of interest.

- 7.2. Of all Company Employees:

- Report their personal situation with respect to a possible conflict of interest upon joining the company and keep it updated according to the corresponding periodicity, signing a Conflict-of-Interest declaration in accordance with the Statement contained in Annex 1.
- Inform their superior when a situation arises that is or appears to be a conflict of interest.
- Refuse those benefits or gifts that generate a conflict of interest in their work, and if they consider that they do not generate a conflict of interest, obtain their superior's consent.
- Refrain from making decisions under conflict of interest and during any analysis process of a possible case of Conflict of Interest.

- 7.3. Of the Head of Human Capital of the Company:

- Ensure that all new personnel joining the company are fully informed and committed to this Policy by signing a declaration of compliance with the Conflict of Interest Statement (Annex 1).
- Implement, in accordance with the corresponding frequency, the process for updating conflict of interest declarations, ensuring the collection of all the necessary signatures.
- Maintain custody of the Statements of the company's employees, whether in physical or electronic file, as appropriate.
- Coordinate committee meetings to evaluate cases of possible conflict of interest and identify employees in positions with greater exposure to a conflict of interest situation for annual updating.
- Request an update of the Statement upon receipt of a notification of a Conflict of Interest.
- If there is any doubt or situation of possible conflict of interest, they are responsible for analyzing it and informing the Unit Director and the Human Capital Department, and in the event of an evident conflict of interest, send a copy to Corporate Internal Audit.
- If in doubt, determine whether the benefit or gift is accepted because it is an institutional event organized not exclusively for the employee. If in doubt, determine whether the benefit or gift is accepted because it is an institutional event organized not exclusively for the employee.
- Define and identify the positions and employees that have greater exposure to a conflict-of-interest situation to perform the annual update of Annex 1 - Conflict of Interest Statement.

- 7.4. Those responsible for complying with and enforcing this Policy shall be:

- The Chief Executive Officer, in the case of Group Chief Executive Officers and Corporate Officers
- The Director of Human Capital and Services, in the case of Directors

- The Human Capital Director, in the case of Assistant Directors
- The person responsible for Human Capital in the Company, in the case of Managers and the following levels

7.5. The Corporate Audit Department will be responsible for verifying compliance with this Policy as part of its normal business review program.

Adherence to the guidelines of this policy is fundamental. Making decisions with Conflicts of Interest and/or not informing the company in a timely manner is a breach of Alpek's policy and may result in serious repercussions. Sanctions may result in loss of confidence in the employee and termination of their contract.

General Premise: All Business Groups and Companies shall align themselves with the regulatory framework established in the Alpek Policies. Company policies may have different conditions, but never less restrictive than the framework established by the Alpek Policy.

Approvals

Name	Position	Authorization Date
José Armando Ramos Cantú	Senior Vice President Human Capital	February 26 th 2021
José Carlos Pons de la Garza	Chief Financial Officer	February 26 th 2021
José de Jesús Valdez Simancas	Chief Executive Officer	February 26 th 2021

Through the Integrity and Transparency Helpline, you can report situations that do not comply with our Conflict of Interest Policy.

E-mail: buzon@alfa.com.mx Webpage: <http://www.alfa.com.mx/CONT/transparency.htm> Phone Number (no cost): 01800-265-2532

ANNEX 1 - CONFLICT OF INTEREST STATEMENT

Company Name Alpek

Present.-

I hereby declare that I have read and understood the contents and provisions of Alpek's Conflict of Interest Policy (PO-ALPEK-CH-01). I commit myself to avoid situations that present or appear to present a conflict of interest, to report them, and to refrain from making decisions in the event that I find myself in such a situation.

In compliance with this Policy, I declare that:	YES	NO
• I am and/or I have relatives* shareholder(s) in any company that is: competitor, supplier, distributor, or customer of Alpek.		
• I have relatives* who work in companies that are competitors, suppliers, distributors, or customers of Alpek and are in a position related to mine.		
• I have relatives* who work in one of Alpek's companies in a position related to mine.		
• I receive or have received financial remuneration for advice or services provided to competitors, suppliers, distributors, or customers of Alpek companies.		
• I have responsibilities to third parties or interests outside the company that may result in a conflict of interest due to the performance of my duties.		
• I receive or have received benefits or gifts from the same supplier, competitor, or customer on more than three occasions in a year or more than \$100 USD per event (except for institutional events organized not exclusively for the employee).		
• In order to clarify any inappropriate interpretation, I wish to inform by means of the attachments to this letter, the situations in which I have doubts or which I consider to be exceptions to the above mentioned and which, in my opinion, do not present a conflict of interest.		

In case of an affirmative answer, please fill out an attachment with the pertinent information.

If, in the future, there is any change in circumstances affecting my position or that of my family members with respect to the application of the above Policy, I will promptly inform my immediate supervisor and the Company's Human Capital in writing. I am aware that making decisions with a conflict of interest and/or not informing the company in a timely manner is a breach of Alpek's policy and may result in serious repercussions. (e.g. loss of confidence in me, termination of my contract). I certify that the information I have provided is true and complete and I am committed to abide by the guidelines established in Policy PO-ALPEK-CH-01 Conflict of Interest.

_____	_____	_____
Name	Signature	Date
_____	_____	_____
Position		Employee Number
_____	_____	_____
Immediate Supervisor Name:	Signed Acknowledgement	Date
_____	_____	_____
Name at Human Capital	Signed Acknowledgement	Date

* Blood relatives up to the fourth degree (grandparents, parents, children, grandchildren, siblings, aunts and uncles, cousins, and nieces and nephews)

* In-laws up to the fourth degree (husband or wife, partner or cohabitant, parents-in-law, brothers and sisters-in-law, sons and daughters-in-law, in-laws, godchildren, among others)

In case of an affirmative answer and in compliance with the Conflict of Interest Policy, prepare an attachment with the following information.

1. If you have family members who work in any Alpek company or who work with a competitor, supplier, distributor, or customer, please fill out the following information:
 - a. Relative's full name
 - b. Relationship
 - c. Company where they work
 - d. Workplace or area
 - e. Relative's position or role

2. If you have direct or indirect participation as a partner, associate, advisor, or provide services independently as a consultant, teacher, or advisor in a company and/or institution, please complete the following information:
 - a. Company
 - b. Line of business
 - c. Describe your participation or role
 - d. Start date

3. If you have received gifts or benefits from a customer, supplier, or competitor in the last year, please fill in the following information:
 - a. Company
 - b. Describe the gift and estimated amount
 - c. Person who gave you the gift
 - d. Date

4. If you have responsibilities outside the company that may interfere with the performance of your duties, please fill in the following information:
 - a. Company, institute, or organization
 - b. Describe the responsibilities, role, or position
 - c. Start date

of annexed pages

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Space reserved for Human Capital area

Based on this information, I determine that:

- There is no Conflict of Interest
- The possibility of a Conflict of Interest exists and will be reviewed appropriately.

Signature	Date

Through the Transparency Mailbox, you can report situations that do not comply with our Conflict of Interest Policy.

E-mail: buzon@alfa.com.mx Webpage: www.alfa.com.mx/buzon.html Phone Number (no cost): 01800-265-2532