

## CODE OF CONDUCT

### 1. Objective

At Alpek, we are committed to the creation of sustainable economic and social value through our operations. To achieve this, this Code of Conduct consolidates the principles of action that we must follow as part of this great organization. Our ambition to improve the quality of everyday life in an extraordinary way is only possible through a spirit of leadership aligned to the values of responsibility, integrity, innovation, customer orientation, collaboration, and commitment to excellence. The same values are the pillar of our daily actions, accompanied by a high level of effort and perseverance to overcome obstacles and achieve our goals. All of the above, while complying with the laws and regulations of the places where we operate.

### 2. Scope

Our employees, contractors, customers, suppliers, and shareholders are a clear example of how we live our culture, while at the same time they are responsible for complying with the principles of the Alpek Code of Conduct, as well as our policies, procedures, and official communications.

### 3. Guidelines

#### 3.1. Anti-corruption

At Alpek, we are committed to guiding our actions with integrity, so we ensure that our employees at all levels of the organization and stakeholders act within the Anticorruption policy (PO-ALPEK-FIN-01) and the framework of local and international standards and guidelines against corruption, fraud, bribery, and money laundering.

In order to avoid involvement in acts of money laundering or financial terrorism, we guarantee the monitoring of all our accounts and transaction records, as well as promote among our employees not to do business with those related to such acts.

#### 3.2. Conflict of interests

Employees have the duty to act transparently and ethically in accordance with Alpek's interests, as well as to avoid being involved in acts of conflict of interest, in accordance with the Conflict of Interest Policy (PO-ALPEK-CH-01). In the event of participation being compromised by this type of act, it must be reported and the corresponding area will observe the case, guaranteeing transparency and clarity.

#### 3.3. Internal and Confidential Information

The company's internal and unpublished information has an impact on the value of our shares and is therefore confidential. Employees at all levels must protect such information from theft, misuse, and loss by not disclosing it or using it for personal gain, even after our employment relationship with Alpek has ended.

Likewise, we respect the personal information belonging to employees, customers, and stakeholders, which shall not be published without consent and is collected and consolidated in accordance with the regulations of the countries in which we operate only for business purposes.

#### 3.4. Financial and Accounting Information

We have systems and areas responsible for the evaluation and monitoring for a correct and transparent reporting of financial and accounting information in accordance with the norms and laws of the countries in which we operate, thus protecting the interests of shareholders and investors.

### 3.5. Intellectual Property, Information Technology, and Communication

Intellectual property, information technology, and communication are key pieces for the operation, therefore, they must be respected and used with due caution, avoiding access by an unauthorized person, obtaining benefits unrelated to Alpek and possible damage to the company's reputation, harm to third parties and benefit for illegal activities.

Non-institutional communication made through social networks by our employees must clearly demonstrate that it is of a personal nature and is not represented by Alpek.

### 3.6. Gifts and Tokens

Accepting and offering gifts, tokens, and entertainment as compensation is regulated in our Conflict of Interest Policy (PO-ALPEK-CH-01).

### 3.7. Tender

The process of selection and acquisition of goods and/or services with third parties must be fair, transparent, and auditable, having a relationship with suppliers based on respect and trust because it has a high impact on our expenses and the quality of our products.

### 3.8. Political Stance

At Alpek, we maintain political neutrality, so we do not make contributions to politicians, political parties, or activist political groups. We also respect the participation of our employees in political activities that do not interfere with their work performance and we prohibit the use of Alpek's name and image or any other form of corporate identity by employees for political purposes.

### 3.9. Human Rights

We support and respect the principles established in the Universal Declaration of Human Rights, a conviction that extends to our employees, suppliers, customers, contractors, and stakeholders, who we seek to commit to our values, code of conduct, and Human Rights Policy (PO-ALPEK-CH-04) and to treat them fairly, with dignity and respect.

We foster a human rights-conscious culture that promotes equal employment opportunities, diversity, and inclusion and seeks to avoid violations of these principles, discrimination, abuse, harassment, and any form of illegal labor, such as child labor, based on the international standards of the 10 principles of the United Nations Global Compact, while complying with the laws and regulations of the countries in which we operate.

### 3.10. Third Parties

- Shareholders: We are committed to creating value for our shareholders, taking into account the sustainable growth of the company and our governance principles.
- Community: We get involved with the community through volunteering and donations that promote the integral well-being of our neighbors.
- Our Customers: We seek to exceed the changing needs of our customers through high-quality products, competitive prices, and a service that adheres to Alpek's values.
- Suppliers: We appreciate relationships with suppliers who share our ethical principles and values, seeking the benefit for both parties under a fair and honest conduct, while complying with the rules that apply to both.
- Competitors: We deal fairly with competitors and support free and fair competition under the laws of the countries in which we operate and our ethical principles, so we reject any anti-competitive act.

- Creditors: We respect our creditors by creating fair conditions and repaying debts on time.
- Public Sector: We collaborate with, assist, and respect government authorities in the exercise of their powers.
- Employees: We live a culture in which our employees are the key to our success, where we promote well-being, equity, safe work environments, and communication.

### 3.11. Community and Environment

We promote a culture of environmental care and conservation inside and outside our facilities, we invest in innovation and technology development to boost process efficiency, and we strictly comply with the environmental regulations to which our industry is subject.

We are involved with the community through volunteering and donations that promote the safety of our neighbors, encourage education programs, and promote environmental awareness.

### 3.12. Safety, Health, and Well-being

At Alpek, we prioritize the health and well-being of our employees, suppliers, contractors, and stakeholders through a culture that promotes physical and mental well-being by complying with the Safety, Health, and Well-being Policy (PO-ALPEK-CH-03) and the laws and regulations related to the safety, health, and well-being of our employees in the countries in which we operate.

*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 <sup>th</sup> 2021 |
| José Carlos Pons de la Garza  | Chief Financial Officer             | February 26 <sup>th</sup> 2021 |
| José de Jesús Valdez Simancas | Chief Executive Officer             | February 26 <sup>th</sup> 2021 |

Through the Integrity and Transparency Helpline, you can report situations that do not comply with our Code of Conduct.

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