

## Anticorruption Policy

### 1. Purpose

- 1.1. Reaffirm to all employees and directors of Alpek company the mandate of conducting all their activities in abidance of the company's ethical and integrity standards, and at the same time comply with the anticorruption laws and policies applicable in the countries where Alpek operates, including the U.S. Foreign Corrupt Practices Act, FCPA.
- 1.2. Establish the basic rules and framework for preventing, detecting, investigating, remedying and, if applicable, penalizing any individual, who works or represents Alpek and had committed an act of corruption under any circumstance, form or manner.

### 2. Scope

- 2.1. This policy is applicable to:
  - Alpek, its subsidiaries and organizations under its control, in all countries where it holds operations.
  - Every employee, executive, director or board member of the company, notwithstanding hierarchical levels or roles (duties).
  - Every individual that either directly or indirectly acts on behalf of the company, such as representatives, agents, consultants, advisors, distributors, etc.
  - Suppliers, contractors, subcontractors and individuals that do not represent the company but provide a service to it will be notified of the existence of this Policy and will be encouraged to observe it.

### 3. Responsibilities

- 3.1. Group President:
  - Comply with and help enforce the statements of this document.
- 3.2. ALPEK Employee / Individual having any relationship with ALPEK:
  - Ensure compliance of the guidelines specified in this policy.
- 3.3. Director of Corporate Internal Audit:
  - Validate compliance of this policy.
  - Evaluate the situations that might occur and are not specified in this document and recommend corresponding actions.
  - Keep the guidelines of this policy up to date.
- 3.4. Vice President of Human Capital:
  - Spread and promote the contents of this policy.

### 4. Guidelines and Procedures

#### 4.1. Definitions

##### 4.1.1. Corruption or bribery acts:

- Offer or promise, pay or receive money or valuables to any individual or entity, to improperly influence their acts or decisions in order to obtain an unfair or unlawful benefit or advantage either at as a personal favor or for the company.
- The mere act of offering or promising any kind of wrongful compensation, even if the act had not been completed, it is itself an act of corruption.

##### 4.1.2. Valuables:

- Gifts, invitations to entertainment events, travel expenses, employment opportunities and other perks or benefits.

## 4.2. Guidelines

- 4.2.1. All anti-corruption laws or regulations applicable in all countries where the company operates shall be observed promptly and at all times, always honoring the moral value of honesty.
- 4.2.2. It is strictly prohibited that employees, contractors or representatives of the company perform, order, authorize, promise, conspire, or induce corruption acts, whether directly or through third parties.
- 4.2.3. Relationships with other companies or institutions
- It is strictly prohibited to offer, solicit, pay or receive any kind of economic compensation or valuables from or to customers, suppliers, companies or other organizations or entities in order to obtain an unfair or improper business advantage.
- 4.2.4. Relationship with authorities
- It is strictly prohibited to perform acts of bribery towards any kind of authority including government officers, company employees or government-owned entities, as well as members of political parties, candidates for public offices, with the purpose of inducing or causing an action or inaction to obtain a benefit, either personal or for the company.
- 4.2.5. Gifts and hospitalities
- It is strictly prohibited to offer or give valuables, either directly or indirectly, when these valuables exceed reasonable business practices, are inappropriate, or have not been entered into the accounting records of the company
  - All gifts received by ALPEK personnel shall comply with the provisions of policy PO-ALPEK-CH-01 Conflict of Interests.
- 4.2.6. Accounting records
- Company's accounting records will be kept in compliance with corresponding guidelines and legislations, including the anti-corruption laws.
  - ALPEK Companies will keep accounting records in such a manner that they reflect every transaction with precision and with reasonable detail.
- 4.2.7. Use of assets
- The use of the company's assets or resource for any illegal purpose or against the company moral values is strictly prohibited.
- 4.2.8. Disciplinary measures
- Compliance with this Policy is a requisite for employment in ALPEK and its affiliate companies.
  - Any director or employee of the company that infringes or fails to comply with this anti-corruption policy shall be subject to applicable disciplinary measures, including termination of the work contract or even reporting complaint before corresponding authorities.
- 4.2.9. Reporting
- Any director or employee of ALPEK having information of any act of corruption or any indication that such acts are occurring, will immediately report it anonymously through the Transparency Mailbox, or in person before his/her superiors, provided that they are not involved.

Alpek Transparency Mailbox <http://www.alfa.com.mx/buzon.html>

*General Premise: All Alpek subsidiaries must be aligned with the regulatory framework established in the Alpek Policies. The policies of each subsidiary may have different conditions, but never less restrictive than the framework established by the Alpek Policy.*

## 5. Approvals

Name	Position	Date of Approval
José Armando Ramos Cantú	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