

Alpek's Code of Ethics

1. PURPOSE

This internal document establishes the ethics norms and rules of conduct that all Employees and External Related Persons must always observe while performing their duties. These rules shall serve as a guide to achieve transparent decision-making and compliance with the ethical responsibility concept that governs Employees and External Third Persons.

2. SCOPE

All Employees, contractors, Board of Directors members, External Related Persons and any stakeholders who may have or exert influence on the company's and its subsidiaries' decision-making process are subject to this policy. They are expected to comply with it as an essential part of Alpek's regulatory framework.

3. GLOSSARY

Code of Ethics

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Employee

Any individual with an employment relationship with Alpek, either through an indefinite-term employment contract or any other form of relationship involving labor subordination.

External Related Persons

Refers to an individual or legal entity, whether domestic or foreign, with a contractual, professional, or business relationship with Alpek, other than an employment relationship. Including but not limited to, advisors, consultants, auditors, suppliers, distributors, customers, intermediaries, service providers, and contractors, among others.

Human Rights

The rights inherent to all human beings, regardless of nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other status, are hereby acknowledged. These rights are interrelated, interdependent, and indivisible.

Alpek

ALPEK, S.A.B. de C.V., and its subsidiaries as applicable, depending on the relevant context thereof. When "Alpek" is mentioned throughout this policy, it will refer to Alpek, S.A.B. de C.V. and its subsidiaries.

Applicable legal regulations

Refers to any law, regulation, requirement, procedure, decree, or international or national code that applies to a jurisdiction or country in which Alpek operates.

4. ALPEK'S COMMITMENT

At Alpek, we are committed to excel at improving everyday lives by delivering better and more responsible solutions through chemistry and materials. In order to achieve it, this Code of Ethics consolidates the principles of action that we must follow as part of this great organization. Our ambition to improve the quality of everyday life is only possible through a spirit of leadership aligned with 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 the above while complying with the laws and regulations of the jurisdictions in which we operate.

5. GUIDELINES

5.1. Anti-Corruption

At Alpek, we steadfastly commit to conducting business with integrity. As such, we ensure that our Employees at every level of the organization, External Related Persons and our stakeholders adhere to the Anti-Corruption Policy (PO-ALPEK-FIN-01), as well as to any local and international regulations and guidelines designed to combat corruption, fraud, bribery, and money laundering. To prevent involvement in money laundering or financing terrorism, we shall diligently monitor all accounts and transaction records while actively promoting a refusal to engage in business with entities and persons associated with such illicit activities among our Employees.

5.2. Conflict of Interests

Employees are required to act transparently and ethically in the best interests of the company, thereby avoiding involvement in conflicts of interest, in accordance with the Conflict of Interest Policy (PO-ALPEK-CH-01). Instances of potential conflicts of interest that could compromise participation must be reported, with the appropriate department investigating the matter to ensure transparency and clarity.

5.3. Internal and Confidential Information

The company's non-public, internal information can impact our share value and is thus deemed confidential. Employees at all levels are responsible for protecting such information against theft, misuse, and loss by refraining from unauthorized disclosure or using it for personal gain, even after their relationship with Alpek has concluded. Additionally, we respect the personal information of Employees, External Related Persons and stakeholders, which must not be disclosed without consent and shall be collected and processed in accordance with the regulations of the countries in which we operate, solely for a valid business purpose.

5.4. Financial and Accounting Information

We have established systems and departments tasked with evaluating and monitoring the accurate and transparent reporting of financial and accounting information in compliance with the laws and regulations of the countries in which we conduct business, safeguarding the interests of shareholders, creditors, investors and stakeholders in general.

5.5. Intellectual Property, Information Technology, and Communication

Intellectual property, information technology, and communication are integral to our operations and must be treated respectfully and cautiously. Unauthorized access, deriving benefits unrelated to Alpek, causing potential harm to the company's reputation or third parties, or facilitating illegal activities must be avoided. Non-institutional communication or opinions made by any of our Employees on any non-official company media or channels, including but not limited to personal social media or public statements should be construed as an entirely personal communication, and in no event shall any person whatsoever interpret such opinions and statements as representative of Alpek.

5.6. Gifts and Tokens

Our Conflict of Interest Policy governs the rules to follow when receiving and/or offering gifts, tokens, and entertainment as compensation (PO-ALPEK-CH-01).

5.7. Tender

The process of selecting and acquiring goods and services from third parties must be conducted objectively, fairly and, transparently, as our relationship with each one of suppliers and contractors must be based on mutual respect and trust, because of the significant impact of these relationships in our ability to provide excellent products and be competitive.

5.8. Political Stance

Alpek maintains a position of political neutrality, refraining from supporting financially or otherwise political figures, parties, or advocacy groups with political agendas. We respect our Employees' involvement in political activities, provided it does not interfere with their professional performance and strictly prohibit the use of Alpek's name, branding, or any other aspect of our corporate identity in political contexts by our Employees.

5.9. Human Rights

We endorse and respect the principles set forth in the Universal Declaration of Human Rights, extending this conviction to our employees, suppliers, customers, contractors, and stakeholders, whom we encourage to commit to our values, Code of Ethics, and Human Rights Policy (PO-ALPEK-CH-04), and to treat them equitably, with dignity and respect. We cultivate a human rights-conscious culture that advocates for equal employment opportunities, diversity, and inclusion, striving to prevent violations of these principles, discrimination, abuse, harassment, and any form of illegal labor, such as child labor, in accordance with the international standards of the United Nations Global Compact in accordance with the laws and regulations of the countries where we operate.

5.10. Third Parties / Stakeholders

- Shareholders: We are dedicated to generating value for our shareholders, taking into account the company's sustainable growth and adherence to our governance principles.
- Community: We actively engage with the community through volunteer efforts and charitable contributions that foster the comprehensive well-being of our neighbors.
- Customers: We strive to surpass the evolving needs of our customers by offering high-quality products, competitive pricing, and exceptional service that aligns with Alpek's values.
- Suppliers: We value partnerships with suppliers who share our ethical standards and principles, working towards mutual benefits under equitable and honest conduct while adhering to applicable regulations.
- Competitors: We maintain fair dealings with competitors and advocate for free and fair competition as per the laws of the countries where we operate and our ethical principles, thereby rejecting any anti-competitive behavior.
- Creditors: We demonstrate respect for our creditors by establishing equitable terms and ensuring timely debt repayment.
- Public Sector: We cooperate with, support, and respect government authorities in the execution of their duties.
- Employees: We foster a culture where our employees are integral to our success, promoting well-being, fairness, safe working conditions, and open communication.

5.11. Community and Environment

We encourage a culture of environmental stewardship and preservation within and beyond our facilities, investing in innovation and technology development to enhance process efficiency and rigorously adhering to industry-specific environmental regulations, as stated in Alpek's Environmental Policy. We engage with the community

through volunteerism and donations that bolster our neighbors' safety, support educational programs, and raise environmental awareness.

5.12. Safety, Health, and Well-being

Alpek prioritizes the health and well-being of our Employees, External Related Persons, and stakeholders by cultivating a culture that emphasizes physical and mental wellness. We achieve this by complying with the Safety, Health, and Well-being Policy (PO-ALPEK-CH-03) and adhering to the laws and regulations concerning the safety, health, and well-being of our employees in the countries where we operate.

5.13. Economic Sanctions and Export Control

Alpek has developed an internal Economic Sanctions Policy to ensure that it complies with all applicable restrictions. This internal Economic Sanctions Policy uses, as its frame of reference, the economic sanctions Laws of the United States, which are among the most detailed in the world; however, Alpek must also comply with the other sanctions Laws applicable to it and its owned or controlled entities in the other jurisdictions where it operates. As part of this commitment, Alpek requires compliance with its internal Economic Sanctions Policy, as well as its Export Control procedures and Export Control applicable regulations, by all its directors, officers, and employees, and all of its agents, consultants, contractors, distributors, sales representatives, and other third parties acting for or on behalf of Alpek.

6. EMPLOYEE'S EXPECTATIONS

Alpek has an obligation to behave in a fair and reasonable manner towards Employees by acting in compliance with its legal commitments. Alpek has implemented several policies concerning this topic, such as a Human Rights Policy, and Safety, Health, and Well-being Policy, among others.

These include:

- Impartial and open selection and appointment procedures
- Clear statements of duties and expectations
- Regular and appropriate communication and feedback about work performance
- Fair rates of remuneration for competence, responsibilities, and performance
- A safe and healthy workplace and work processes
- Good working conditions, including freedom from harassment or discrimination
- Appropriate training and equipment
- Equal employment opportunities
- Opportunities for development

7. RESPECT FOR EACH INDIVIDUAL

Alpek recognizes that every individual deserves to work in an environment where they are treated with dignity and respect. Alpek believes that by creating such an environment it allows individual to bring out their full potential, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Alpek is an equal employment/affirmative action employer committed to providing a workplace free of discrimination and abusive, offensive, or harassing behavior. Any Employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources in accordance with the Human Rights and the Whistleblower policies.

All Alpek Employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

Always treat others with dignity and respect.

- Address and report inappropriate behavior and comments that are disrespectful, discriminatory, harassing, abusive or offensive.
- Foster teamwork and Employee participation, encouraging the representation of different Employee perspectives.
- Seek out insights from Employees with different experiences, perspectives, and backgrounds.
- Discourage as reasonably as possible the use of slang or idioms that might not translate across cultures among Employees.
- Offer support for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.

Alpek will not tolerate discrimination, harassment or any behavior or language that is disrespectful, discriminatory, harassing, abusive or offensive.

8. NO FALSE ACCUSATIONS

As much as we encourage honest reporting, we do not tolerate knowingly false reports. Making a false accusation can divert investigatory resources away from credible good-faith concerns and damage morale. Report what you have a reasonable, good-faith belief to be true, but never knowingly make a false accusation, lie to investigators, or refuse to cooperate in an investigation, as these actions may also violate this Code of Ethics.

9. CODE VIOLATIONS

When one of our Employees or External Related Person fails to follow our Code or applicable laws, ignores someone else's failure to follow the Code, or pressures someone else to violate the Code, a violation has occurred.

This can harm Alpek's reputation and our bottom line. We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to and including suspension without pay, loss of merit increases or annual incentives, and termination of employment. An act violating the law could result in fines or criminal prosecution. Code violations are also documented in your employee records.

Alpek has other policies and processes governing performance, conduct, and behavior. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

10. BREACH OF CODE

While discipline for standard violations will follow a progressive disciplinary procedure, Alpek reserves the right to implement discipline per the grievousness of the violation. Violations of these or any other of Alpek's policies may subject you to disciplinary action, up to and including immediate termination.

Any behavior or action that may breach this Code will be given full and impartial consideration. If a breach is identified, disciplinary action may be taken. Alpek employment agreements, the employee manual, and the human resources toolkit describe the procedures for disciplinary action, the primary aim of which is to correct unacceptable employee behavior or performance. A copy of the employment agreement that applies to you and the manual is available. You should familiarize yourself with these procedures to know what action may be taken if you breach this Code.

If you are unsure of the proper conduct for any situation, or the standards of performance expected of you, or think you might be at risk of breaching the Code, discuss the situation with your manager.

11. RESPONSIBILITIES

Alpek, S.A.B. de C.V.'s Human Resources Department and its subsidiaries must:

- i. Ensure compliance with this Code.
- ii. Establish and execute guidelines for sanctioning non-compliance with this policy in accordance with applicable legal regulations.
- iii. Ensure that Employees, External Related Persons and other stakeholders:
 1. Know, understand, and comply with this Code.
 2. Participate in the training and education indicated in the Code.
- iv. Integrate the Code of Ethics into the business unit's policy guidelines.
- v. Execute sanctions for non-compliance with this Code, in accordance with established guidelines and Applicable legal regulations.

12. CONTACT

Any questions about this Code should be referred to:

- The direct manager or next-level manager
- The Human Resources manager or director
- Alpek's parent company, ALFA, S.A.B. de C.V.'s transparency helpline (<http://www.alfa.com.mx/CONT/transparency.htm>)

13. EXCEPTIONS AND/OR MODIFICATIONS

The Alpek, S.A.B. de C.V. Human Resources Department shall analyze any situation not covered by this Code. If it constitutes an exception or modification to the established policies, the authorizers must approve them.

14. TRANSPARENCY AND REPORT

Alpek is committed to transparent and integrity-driven communication regarding the integration and compliance of the Code of Ethics.

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.

APPROVALS

Name	Position	Date of Approval
Jorge Pedro Young Cerecedo	Chief Executive Officer	June 12 th 2023
Teresa Quintero Mármol Véliz	Vice President Human Capital	June 12 th 2023