

Alpek's Risk Management Policy

1. OBJECTIVE

This Policy aims to identify, in due time, the main potential and strategic risks that may affect the continuity of Alpek's financial, operational, and reputational objectives, establishing an appropriate mitigation plan to reduce impacts through defined roles and responsibilities under a risk management model.

2. SCOPE

This policy applies to the Board of Directors, executives, employees, interns, and those who, although not employees, act on behalf of Alpek.

3. TOOL

Documentation and follow-up must be carried out using the official tool designated by Alpek's Comptrollership area.

4. GLOSSARY

As used in this Policy, the following terms shall have the meanings stated:

Risk Inventory

A registry of risks that may impact an area, maintained through the approved tool.

Business Responsible

The Business Unit President is responsible for identifying and managing risks.

She/he must keep such risks updated and report them in due time to the Group General Management, as well as to Internal Audit, Sustainability Department, and key personnel within their company.

Risk Management Responsible

Each Business Unit's Controller, designated to monitor, follow up, and track the mitigation plan for the identified risks.

Inherent Risk

The risk that exists in the absence of any action by the business to reduce its likelihood or impact, i.e., the risk magnitude prior to implementing mitigation.

Residual Risk

The risk that remains after mitigation measures or controls have been implemented.

Procedure

The risk management process follows a continuous five-stage cycle:

- Stage 1: Risk Identification
- Stage 2: Risk Assessment
- Stage 3: Risk Response
- Stage 4: Monitoring Implementation of Action Plans
- Stage 5: Reporting

Stage 1 – Risk Identification

Each Business Unit President must:

- Ensure that risks and their mitigation actions are updated:
 - The Risk Inventory must be created and updated quarterly and on an ongoing basis.
 - Updates must be registered in the official documentation tool defined by Alpek's Comptrollership Department.
 - Risk identification may consider the perspective of internal subject matter experts and industry best practices.
- Ensure each identified risk is assigned a Risk Management Responsible and a Mitigation Responsible.

Each Risk Management Responsible must contact Alpek's Comptrollership or Internal Audit Department to request tool access.

Stage 2 – Risk Assessment

The Risk Management Responsible Team must:

- Classify each documented risk in the tool based on the following criteria:
 - Compliance Risks: Risks of noncompliance with internal or external laws, regulations and standards.
 - Strategic Risks: Risks with negative consequences that may compromise the achievement of company purpose, principles or objectives.
 - Financial Risks: Risks that threaten the organization's financial results or the timeliness and reliability of financial information.
 - Operational Risks: Risks that impact operational efficiency and effectiveness.
 - Some risks may also have Environmental, Social, or Governance (ESG) implications and must be flagged as such in the tool.
- Define both the inherent and residual probability and impact of each risk within the tool, in consensus with the Business Unit President and according to the internally established criteria.
- Report risk assessment updates to Comptrollership and Internal Audit Department by June 15 and December 15 of each year.
- Immediately report any materialized risk or those at high risk of occurring to Comptrollership and Internal Audit.

Internal Audit must:

- Ensure complete and on-schedule documentation of Alpek's Business Risk Inventories.
- Hold sessions with each Business Unit President to formalize and/or complement the Risk Inventory, prioritizing the most significant risks.

Stage 3 – Risk Response

The Risk Management Responsible Person must:

- Define required action plans in coordination with the Business Unit President and Mitigation Responsible Person to address identified risks.
- Update mitigation plans and progress in the tool.

The Mitigation Responsible Person must:

- Monitor, validate, and support the execution of defined action plans.
- Periodically report progress to the Risk Management Responsible and Business Unit President, and update progress percentages in the tool.

The Comptrollership and Internal Audit Department must validate that risk action plans (prioritizing those of high impact and high probability) are reasonable, specific, measurable, achievable, time-bound, and address root causes.

Stage 4 – Monitoring Implementation of Action Plans

The Risk Management Responsible Person must:

- Review performance of defined controls.
- Periodically update plan progress in the tool.
- Request incorporation of any newly identified risks into the tool.
- Update probability and impact (residual risk) based on implementation progress of the related controls.

The Business Unit President must ensure that risk action plans under their responsibility are implemented on time and effectively.

The Internal Audit Department must include selected risk action plans in its annual audit follow-up plan.

Stage 5 – Reporting

At least once a year, Alpek's Comptrollership Department must issue a report containing:

- Consolidation of risks identified per business unit.
- Progress status of high-probability and high-impact action plans.

This report must be shared with the Business Unit President.

Depending on the magnitude or materialization of a given risk, the Business Unit President may be requested to present their risk and mitigation plan to the Board or the Audit and Corporate Practices Committee.

APPROVALS

Name	Position	Date of Approval
Jesús Galvan Rodriguez	Comptrollership Director	July 22 nd , 2025
José Carlos Pons	Chief Financial Officer	July 22 nd , 2025
Jorge Pedro Young Cerecedo	Chief Executive Officer	July 22 nd , 2025