

SUPPLIER CODE OF CONDUCT

1. Objective

This policy expresses Alpek's commitment to conduct business ethically and legally throughout its global organization. We seek to ensure that our business partners preserve and strengthen Alpek's reputation by acting consistently with our supplier code of conduct.

2. Scope

All Suppliers shall respect and adhere to the Code when conducting business with or on behalf of us. Suppliers are also expected to apply this Code and Supplier's relevant policies throughout their supply chain, conveying it to its parent, affiliates, employees, agents, suppliers, contractors, sub-contractors, and its related third parties, assuring by any reasonable means that they are in compliance. The Code sets out the guidelines for these business partners so that all interactions can be monitored and reviewed for improvement.

3. Guidelines and Procedures

3.1. Definitions

Each term defined herein shall have the following meaning:

Suppliers

The entities and individuals that manufacture, trade, or deliver services to the Company or our clients by means of consulting outsourced services, or distribution of products. Covers all vendors, consultants, suppliers, contractors, subcontractors, and third parties that have a relationship with Alpek.

Code

Alpek's Supplier Code of Conduct, as amended from time to time.

Agreement

Means or refers to any agreement between any party who is in a relationship with Alpek, or to whom this Code applies, as amended from time to time and any indenture, agreement, or instrument supplemental or ancillary hereto or in implementation hereof.

Product

Means or refers to any product or service sold pursuant to an Agreement.

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. For a specific subsidiary or affiliate of Alpek, the term Alpek shall be extensive to such entity.

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 or a Supplier operates as the case may be.

3.2. Guidelines

3.2.1 Alpek's Expectation

This document is a summary of our expectations from Suppliers in the areas of business conduct, integrity and anticorruption, trade controls, labor practices, health and safety, and environmental management. This is not a comprehensive list of principles as we expect Suppliers to have the highest ethical standards and compliance with Applicable legal regulations, business standards, and ethical practices when conducting any kind of business with us. Moreover, where and when there are differences between the Code, and their internal policies, business standards, ethical practices or Applicable legal regulations, Suppliers shall adhere to the more stringent requirements.

3.2.2 Principles

By accepting this Policy, the Supplier confirms adherence to the following principles:

- i. **Business Integrity**
 - a. The Supplier conducts business honestly and fairly, according to ethical standards and business practice.
- ii. **Compliance with Laws and Regulations**
 - a. The Supplier shall maintain awareness and comply with all applicable laws, regulations, and legal requirements governing its activities, including those applicable in the country of origin and destination of the goods, services, and/or transactions, as well as all applicable requirements relating to Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT).
- iii. **Anti-Corruption**
 - a. At Alpek, we have zero tolerance with respect to any kind of corruption and money laundering. The Supplier complies and will comply with the anti-corruption and money laundering laws of the countries where it does business, including but not limited to, the U.S. Foreign Corrupt Practices Act, the OECD Anti-Bribery Convention, the Corruption of Foreign Public Official Act (S.C. 1998, c.34) of Canada, the United Kingdom Bribery Act 2010, or any other applicable anti-bribery law or treaty. Alpek prohibits its Suppliers from engaging in any form of public sector or commercial bribery. Under no circumstances may a Supplier acting on behalf of Alpek promise or provide anything of value directly or indirectly to a government official, or to any person or entity in the private or commercial sector, if the payment is intended to induce the recipient to misuse his or her position to obtain or retain an unfair business advantage or personal benefit.
- iv. **Gifts, Entertainment, and Conflict of Interests**
 - a. Suppliers must obtain business legally and ethically. We prohibit anyone from accepting, providing, and/or offering gifts, tokens, and entertainment as compensation, or in a way that could inappropriately influence Alpek's business decisions.
- v. **Trade Controls**

- a. Suppliers must adhere to all Applicable legal regulations with respect to export control rules, economic sanction regulations and embargoes, antitrust, anti-monopolies, and anti-competitive business, in the countries of their operation.
- vi. Human Rights
 - a. At Alpek, we support and respect the principles established in the United Nations Universal Declaration of Human Rights. We encourage Suppliers to have a diverse workforce and provide a workplace free from discrimination or any other form of abuse.
 - b. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment will not be tolerated. Employment decisions shall be based on qualifications, skills, performance, and experience.
 - c. Supplier employees shall receive compensation and benefits that comply with Applicable legal regulations, ensuring that they work in compliance with all Applicable legal regulations and industry standards regarding the number of hours and days worked. The supplier employees will have clear written employment information for all employees that define remuneration, deductions, and terms of employment.
 - d. Alpek is committed to integrating labor practices and human rights considerations into its supply chain management and procurement decisions. Suppliers are encouraged to demonstrate proactive measures to manage working hours, fair wages, and workplace conditions as part of their supply chain practices alongside conventional purchasing criteria in compliance with all Applicable legal regulations.
 - e. Alpek encourages Suppliers to set both qualitative and quantitative objectives to ensure continuous improvement in respecting and promoting human rights and fair labor practices throughout their supply chain in compliance with all Applicable legal regulations.
 - f. This policy (Code) is supported by Alpek's Human Rights Policy (PO-ALPEK-CH-04).
- vii. Child and Forced Labor
 - a. Child labor, forced labor, modern slavery, and human trafficking are strictly prohibited. Suppliers shall comply with International Labor Organization (ILO) standards.
 - b. Under no circumstances will the Supplier use or benefit from forced or compulsory labor. The employment decision shall be based on free choice and there can be no coerced or prison forced labor.
- viii. Safety, Health, and Well-being
 - a. At Alpek, we provide safe and healthy working conditions for our employees and ask Suppliers to do the same.
 - b. Our Suppliers must manage health and safety risks to provide a safe and healthy workplace environment for their employees, consultants, contractors, subcontractors, and visitors, where occupational injuries and illnesses are prevented.
- ix. Business and Financial Records
 - a. The Supplier shall keep accurate records of all business transactions when doing business with Alpek.

- x. Product Quality and Safety Standards
 - a. To maintain Alpek's valuable reputation, compliance with our quality processes and safety requirements is essential. Suppliers involved in any stage of it (development, manufacture, transportation, storing, etc.) shall be aware and comply with all applicable local and federal food safety regulations; shall meet Alpek's quality specifications, policies, and standards, as well as reporting any issues that may negatively affect the quality and image of our product.
- xi. Confidentiality
 - a. The unauthorized use of confidential and/or personal information by the Supplier is prohibited. Therefore, Suppliers shall take all necessary precautions to safeguard Alpek's information to which it has access, including not disclosing to anyone, unless disclosure is properly authorized, in connection with a clearly defined legitimate business need (i.e., shared only on a need-to-know basis), and subject to a written confidentiality agreement, whether such obligations are in a stand-alone agreement or part of the specific agreement between Alpek and the Supplier.
- xii. Gender Equality
 - a. As signatories of the Women Empowerment Principles, at Alpek, we proactively support gender equality within our organization and promote that our Suppliers do the same.

3.2.3 Environment and Sustainability

The Company believes in living up to a high social responsibility and sustainability standard. We are constantly striving to live up to our stewardship of the environment, which is extended to all our suppliers and their business practices. Alpek's Suppliers shall carry out their operations with strict adherence to all environmental regulations applicable to the industry and country where they operate and/or deliver their products.

- i. We encourage our Suppliers to identify opportunities for natural resources conservation and recycling, establish reduction targets, and implement action plans for reducing environmental impacts on various fronts such as water usage, wastewater, energy consumption, GHG emissions, and waste.

3.3. Procedures

3.3.1 Compliance

Alpek may conduct reasonable audits to verify compliance with this Supplier code. Should we encounter that the Supplier is not in compliance with these requirements, Alpek reserves the right to demand corrective measures and/or terminate its business relationship and related Agreements.

The Supplier must conduct its business in full compliance with any anti-trust or fair competition regulation in place within your jurisdiction of business operations. The Supplier must ensure operation in an honest and transparent manner with any agency or government officials at all times.

3.3.2 Integrity and Transparency Helpline

Alpek is committed to transparent and integrity-driven communication regarding the integration, compliance, and identification of violations and the mitigation and remediation actions it undertakes, ensuring a secure and healthy relationship with our suppliers and employees.

- i. Alpek S.A.B. de C.V. has an “Integrity and Transparency Helpline”. You are encouraged to contact the company via email or telephone whenever you want to address any situation you consider is not achieving the transparency and security levels that our organization requires. Your comments may be submitted anonymously, but we encourage you to leave your contact information in case a follow-up is needed. We will take all reasonable measures that are appropriate to keep the information you provide confidential, through the following transparency helpline ([Transparency Helpline | Alpek](#)) or email to the following e-mail address transparency@alpek.com
- ii. Upon receipt of a report or complaint under this Code, the person who received it must proceed in accordance with the procedure that Alpek may have established to address such matters in a particular country, where applicable. The mentioned transparency helpline administrators will periodically participate in training and updating programs to adequately address and resolve reports or complaints filed under this policy.
- iii. Any report or complaint made in good faith regarding suspicions or detections of non-compliance with this policy will be thoroughly investigated and resolved as confidentially as possible, in accordance with the Alpek’s Whistleblower 002 03/Mar/25 Protection Policy (PO-ALPEK-FIN-09-ENG), including any other procedure that Alpek may have established to address such matters in a particular country, where applicable, and in compliance with the Applicable legal regulations and, where applicable, any collective labor agreement.
- iv. All communication with the complainant will be carried out in accordance with Alpek’s Whistleblower Protection Policy, including any other procedure that Alpek may have established to address such matters in a particular country, where applicable, and always with the involvement of the local legal department.

4. Review Date

September 15, 2029

5. Authorizations

Name	Position	Date of Approval
Teresa Quintero Marmol	Vice President Human Resources	
Jorge Pedro Young Cerecedo	Chief Executive Officer	

Supplier company name (Legal entity):

Supplier Address:

Contact Name and Job Title:

Date:



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Scope: Alpek and Subs

Responsible office: Human Resources

Signature:
