

## 1. OBJECT

For Plastilene Group, the purpose of this Anti-Corruption Policy is to commit its employees, or those who work for or on behalf of the Companies that compose it, to comply with everything concerning applicable anti-corruption laws.

The Group has "Zero Tolerance" with any conduct that could be considered bribery or that could, in any other way, be considered corrupt and / or that infringes ethical principles, legality, respect, justice, equity, honesty and responsibility.

This Policy complements Plastilene Group Code of Ethics, adopted by the Board of Directors.

## 2. SCOPE

This Policy applies to the entire Business Group: employees, contractors, administrators or own associates or of any subordinate legal person and other linked third parties, national and international.

## 3. RESPONSIBLE

### Responsible areas for its implementation and compliance

Presidency of the Group in coordination with the Corporate Management of Human Management will be responsible for approving and disseminating this Policy to all Business Managers of Plastilene Group, so that they, in turn, inform other collaborators establishing with other processes its compliance and disclosure in its entirety to all levels.

Similarly, the Presidency of the Group with Corporate Management of Human Management, other Corporate Managements and Business Managements, are responsible for coordinating with directors and department heads, identifying levels of risk of corruption and guaranteeing preventive and corrective measures adoption to control any risk that has been identified.

Likewise, supervising implementation of this Policy and coordinating with whoever corresponds, in accordance with the nature of the fact reported, investigation of complaints and reports concerning possible violation of this policy and having disciplinary procedures and / or corresponding appropriate sanctions.

Internal Audit will be responsible for supervising, monitoring compliance with this policy and must incorporate this responsibility in its control programs.

## 4. DEFINITIONS

- **A bribe:** is defined as the act of giving, offering, promising, requesting or receiving something of value as consideration for an undue benefit or improper advantage or as consideration for performance of any public or private function, regardless of whether said offer, promise or request is for himself/herself or a third party, or under the proper name of that person or on behalf of a third party.

- **An agent:** is a third party authorized to act on behalf of any of Plastilene Group companies. Agents including, among others, legal advisors, consultants, suppliers, general agents, commercial agents and, in general, any intermediary with the ability to engage the Group's companies in any type of transaction.
- For all purposes of this Policy, all agents and proxies are Representatives of the Company and therefore they are required to comply with this Policy.
- Prohibition of bribery in Business Group includes "commercial bribery", that is, indirect bribery which violates laws of many countries. Commercial bribery generally involves giving something of value to an intermediary, for example, an employee of a customer, without knowledge of the immediate superior of that official's employer, with the intention of improperly influencing business conduct of that company.
- Therefore, Plastilene Group companies and Company Representatives are strictly prohibited from offering, paying, promising in payment, authorizing payment, requesting, receiving or authorizing receipt of money or anything of value, whether direct or indirectly, for the purpose of obtaining, retaining or directing business towards any person or for any other type of improper advantage. The expression "anything of value", indicated above includes money, gifts, entertainment, travel, services and any other hospitality.
- Some examples of prohibited payments include granting of money, expensive or disproportionate gifts, loans, trips, discounts among others.

## 5. DEVELOPMENT

### 5.1 Absolute prohibition of any form of bribery

Plastilene Business Group strictly prohibits bribery in any form, including directly or indirectly through an agent or other third party, whether in relation to a public official or a private person.

### 5.2 Colombian anti-corruption statute

Colombian regulations expressly sanction corrupt conduct related to employees and former public employees, as well as directors, employees, administrators and advisers of private companies.

Colombian main anti-corruption regulations are formulated in Criminal Code (Law 599 of January 2000), in Law 1474 of 2011, known as Anti-Corruption Statute, by means of which rules aimed at strengthening mechanisms of protection, investigation and punishment of corrupt acts and effectiveness of public management; likewise, in Law 1778 of February 02, 2016 on rules on

responsibility of legal persons for acts of transnational corruption and other provisions in fight against corruption.

### **5.3 Interest conflict**

Although internal regulations for conflicts of interest are provided for in Code of Ethics and are independent, at the same time they complement this Policy.

### **5.4 Penalties for non-compliance with this anti-corruption policy**

Partial or total breach of this Policy leads to imposition of administrative or criminal sanctions by various national or international control authorities, as well as disciplinary sanctions established by the corporate group and / or termination of his/her employment contract.

<b>Approved by</b>
Stefano Pacini Plastilene Group CEO