Anti-corruption Policy

Actualizado 2023

I. Purpose:

To develop and promote anti-corruption principles and practices at PRODENVASES, based on the evaluation and careful analysis of the risks posed by the nature of the company's operations, in order to minimize the probability of occurrence of such risks.

II.Scope

The Anti-corruption Policy applies to all company personnel, partners, customers, suppliers and third parties related to PRODENVASES in Colombia and abroad.

This policy complements the PRODENVASES Code of Conduct and Principles (Code of Ethics).

III. Definition

Corruption:

The practice of abusing power, functions or means to obtain economic or other benefits[1]. The following are forms of corruption: Bribery, abuse of payments, gifts and favors, facilitation payments, extortion, conflict of interest, abuse of patronage, political contributions without transparency, money laundering, manipulation of information, favoritism and nepotism and, in less strict terms but closely linked to the concept of corruption, fraud.

IV. Responsibilities

The Company's Management assumes the anti-corruption program as its own, therefore, it considers it as one of its responsibilities, and ensures that it is understood by all hierarchical levels of the company and known by partners, suppliers, customers, contractors and third parties. It also allocates the necessary human and financial resources for its application and continuous improvement.

PRODENVASES employees must adhere to the anti-corruption program, apply it and continuously update it in daily operational activities, as well as monitor it. They must also manage risks and ensure the adoption of preventive measures to strengthen the company's control environment.

Business partners (suppliers, customers, contractors and third parties) will also be encouraged to adhere to the company's standards.

Employees, partners, suppliers, customers, contractors and third parties of PRODENVASES, before any suspicion of corruption in the company, must report according to the channels established for this purpose. The Company's management coordinates, according to the reported fact, the investigation of such facts and the corresponding reports, and manages the respective sanctions.

The communication channel available in the company to report and denounce is the Compliance Officer, through means such as email, cell phone and in person, as detailed below.

Reports made by employees, partners, customers, suppliers, contractors and third parties regarding possible acts of corruption must be handled prudently, in good faith and on reasonable grounds, and will be handled confidentially and securely. Whistleblowers are not authorized to provide information in this regard, so any inquiries from third parties should be referred to the area in charge of conducting investigations.

The Compliance Officer will conduct the relevant investigations, collect evidence of the violations and issue an objective and independent report on the results. The decision to disclose to the competent authorities will be made jointly with the General Management and the Head of Human Resources.

Employees, partners, suppliers, customers, clients, contractors and third parties will not be discriminated against, dismissed, penalized or subject to retaliation of any kind for reporting possible acts of corruption, as long as they act in good faith and on reasonable grounds, otherwise the company will apply the internal policies and penalties provided by law.

III. Transparency and Business Ethics Program Policies

For **PRODENVASES**, integrity and transparency are fundamental pillars of its business, which is why it has encouraged the adoption of corruption prevention schemes and systems that promote these two values in management. Aware that these schemes and systems must be consolidated and strengthened to prevent, detect, punish and eradicate corruption, the following provisions are established, which are mandatory.

- **PRODENVASES** strictly prohibits any form of corruption, either directly or indirectly through contractors or third parties.

- All anti-corruption mechanisms, policies and principles are integrated into the company's culture, strategy, decision-making and daily activities.

- In the search for strengthening the company's internal control as a tool to prevent corruption in all its forms, adequate procedures are developed for the prevention, detection and treatment of corruption, as part of a continuous improvement process.

- The culture of identification and prevention of the risk of corruption in all its forms is promoted in the search for the consolidation of the Internal Control System and the development of a culture of self-control and self-evaluation within the company.

- When PRODENVASES enters new markets, offers new products or makes changes in the organization, it will evaluate the risk of Corruption and its forms.

- Neither the Directors, Associates, Employees, nor Contractors, contractors in consideration of their specific legal relationship with PRODENVASES, should request, accept or give gifts, money, entertainment (or attention) or preferential treatment with companies or persons who have or intend to perform any type of commercial or business relationship or to secure or accelerate or avoid procedures or to know a matter that interests the Company or the employee or director.

- Neither the Directors, Associates, Employees, nor Contractors may accept, for themselves or for third parties, donations, remunerations or compensations in money or kind from suppliers, customers, contractors or any natural or legal person related or unrelated to the Company, which may lead to any kind of unauthorized commitment.

- Charitable contributions or donations cannot depend on a commercial agreement, nor can they be made for the purpose of obtaining a contract or doing business. Donations made by PRODENVASES must always have a lawful purpose and will always be made to a non-profit organization on which due diligence has been

performed and must be made in compliance with all applicable laws and regulations, especially those related to tax issues.

- In the case of Political Contributions, this must be a decision to be made openly with the resolution of the Board of Directors.

- PRODENVASES has a Commercial Area and a Foreign Trade Area; the payments made to the employees in charge of these areas are made in accordance with the provisions of the Colombian labor law in force, and as provided in the contracts signed.

- Payments to contractors and suppliers abroad must be in accordance with the negotiation carried out, according to the purchase negotiation procedure established by the company, which has the authorizations and monitoring of the appropriate levels of responsibility. Any payment that does not correspond to the negotiation must be duly justified based on ethics and good business practices and approved by the appropriate level of authorization according to the matrix of attributions.

- PRODENVASES will apply the travel expense policy for its employees, which is based on criteria of reasonableness of expenses and determines the guidelines for a good use of resources.

- For any decision to be made, all PRODENVASES S.A.S. employees must not be influenced by personal or family considerations that could consciously or unconsciously affect what is in the best interest of the company. The employee is obliged to give an adequate management to the events of conflict of interest, disclosing the possible or eventual conflict of interest to their Immediate Superior, who in turn will consult with the Human Resources area of the company, to determine the relevance of such conflict and the corresponding management.
  In the case of new employees, the Human Resources areas, during the hiring process, will communicate the criteria and obligations that are contracted as an employee with respect to this type of situation.

- By maintaining adequate and available channels, communication is promoted and encouraged for employees, partners, suppliers, customers, contractors and third parties to seek guidance or report possible violations.

- The reporting or detection of violations to the anti-corruption procedures and policy will be addressed with "**ZERO TOLERANCE TO CORRUPTION**" and will be investigated with independence and confidentiality, applying due process, based on the principles enshrined in the rule of law, including the presumption of innocence, the right to be heard and the preservation of integrity through the principle of "who has a need to know." Also considering the Personal Data Protection Act. Likewise, the necessary legal actions will be taken to enable the authorities to act.

- As part of the zero-tolerance to corruption policy, the company will penalize fraudulent conduct by Managers and employees, regardless of their size and scope, in accordance with the company's Internal Work Regulations, without prejudice to any legal actions that may apply.

- Communication and training of employees on the anti-corruption program is a fundamental part of risk management so that they become multipliers of this information within each of the areas to which they belong and processes in which they participate.

- Communication and training on the company's anti-corruption program includes the internal recruitment process and the external hiring process (Business Relationships).

- PRODENVASES personnel will receive communications and participate in mandatory standardized training once a year.

- Anti-corruption compliance audits will be conducted to evidence compliance with the various elements of the company's anti-corruption program, as well as to conduct tests to ensure substantive compliance (Potential violations or warning signs).

- All PRODENVASES transactions must be recorded accurately, with reasonable detail and in a timely manner and be supported by the original documentation, which must be adequately safeguarded to prevent deterioration, intentional or unintentional destruction, inappropriate or unauthorized alterations, or disclosure. The time of conservation of such documentation will be pursuant to legal provisions.

- PRODENVASES has controls and procedures for the proper handling and safeguarding of the documentation supporting the transactions, which guarantee the integrity, confidentiality and availability of the information.

- The Compliance Officer shall be responsible for safeguarding and maintaining the supporting documentation of the Transparency and Business Ethics Program for a minimum period of five (5) years.

IV. Whistleblower Channels

PRODENVASES has an ethics hotline with the following channels:

A. E-mail

E-mail: diana.rendon@prodenvases.com.co

B. Phone

Phone: 3003905909

Internal and external stakeholders (customers, suppliers, contractors, community, etc.) who wish to make a complaint related to corruption and its forms will be guaranteed confidentiality and will be protected against retaliation.

- The information received is managed responsibly, professionally and confidentially.
- Each case will be assigned a Report Number (Complaint Filing), to facilitate its follow-up.
- The Compliance Officer, which is responsible for the Ethics Hotline, will be in charge of reviewing the reported complaints; it will carry out the analysis, evaluation,

solution and response of the complaint to the interested user.

• In cases where the complaint is related to the compliance officer, who is responsible for the Ethics Hotline, these must be reported to the Internal Audit.

Related policies and procedures.

- Code of Principles and Conduct.
- Management Policy for the Prevention and Integral Control of the Risk of Money Laundering, Financing of Terrorism and Financing and Proliferation of Weapons of Mass Destruction (SAGRILAFT/FPADM in Spanish).
- Personal Data Protection Policy Manual.

DIANA PATRICIA RENDÓN TOBÓN
COMPLIANCE OFFICER