

PTE COMPOUNDING DE MÉXICO S.A. DE C.V. CODE OF CONDUCT

This Code of Conduct is designed to provide guidance on how to relate as co-workers, as well as to our customers and visitors, in an ethical, appropriate, respectful and inclusive manner.

This document describes the ethical standards under which all employees of PTE Compounding de México S.A. de C.V. (hereinafter "PTE") must perform. These registered standards are in accordance with the required legal obligations, and some additional, as a sign of our commitment to work responsibly and ethically.

This code applies to all PTE employees and everyone will be required to read and understand this Code of Conduct.

The responsibility to comply with the rules and guidelines of this code is of all employees, as well as to report any suspicion of violations or infractions to it and, if necessary, to cooperate with the company in any case of investigation of possible inappropriate behavior.

Committed to shareholders, customers, suppliers, co-workers, government authorities and society in general and adhering to the principles established in this Code, we will carry out our activities in such a way that:

- We know, understand and comply with the Code of Conduct and encourage our colleagues to do so as well.
- We comply with the regulations, policies and procedures that the Company has established for the optimal performance of our work.
- We carry out our work by putting the interests of the Company above any particular interest; that is, we do not take personal advantage by working at PTE.
- We treat all our colleagues with respect and fairly and avoid any kind of discrimination, harassment or mistreatment.
- We carry out honesty and rectitude all our relationships with customers, suppliers, authorities and, in general, with third parties who for various circumstances are linked to the Company.
- We do not make false, bad faith or unsubstantiated allegations against co-workers.
- We denounce acts and behaviors that are contrary to our Code of Conduct.
- We protect the confidentiality of information belonging to the Company.
- We do not use the Company's information or assets for our own benefit or that of third parties.



CONFLICT OF INTEREST

Each of us is obliged to protect the Company's resources and avoid conflicts of interest, as well as we must act in the interests of the Company and avoid any possible or actual conflict of interest.

A conflict of interest is when business relationships or personal, social, financial or political activities interfere with our objectivity and loyalty to PTE.

Here are some examples of some conflicts of interest, so you should follow the following restrictions:

- You should not accept a bribe in exchange for awarding a PTE business to a supplier.
- We should never use our position in PTE for personal gain.
- Avoid any situation where you have a job or business interests outside the company that interfere with the performance of your work at PTE.
- You should not receive fees for giving speeches or making presentations in relation to your work for PTE.

GIFT ACCEPTANCE

It may be the case that for your work activities in PTE you receive offers of gifts or entertainment from customers and / or suppliers.

In general, the only types of gifts you can accept from anyone who has or may have a business relationship with PTE are as follows:

- Infrequent gifts of little value, such as promotional.
- Occasional meals of reasonable range and cost with a business contact.

No PTE employee should accept the following:

- Accept an offer or gift that makes you feel compelled to promise or do something in return.
- Nor accept something in exchange for granting someone a business with PTE.

In case of receiving something that is acceptable, it must be delivered to the Human Resources department to be raffled among the company's employees.

COMPETENCE

PTE respects fair competition. Applicable laws that protect and promote competition, in particular applicable antitrust laws and other competition laws, are respected.

In dealing with competitors, these regulations in particular prohibit agreements and other activities that affect prices or conditions, allocate sales territories or customers, or unduly impede free and open competition.

In addition, these regulations prohibit agreements between customers and suppliers with which customers must be restricted from their freedom to autonomously determine their prices and other conditions for resale (price and condition determination).



FRAUD PREVENTION

Any fraudulent activity is strictly prohibited, everyone at PTE must act with honesty and integrity when working with company resources, materials, funds and systems, taking an approach against fraud prevention and detection.

Some examples of fraud are as follows:

- Stealing cash, inventory items, or other assets
- Submitting false or misleading refund requests
- Cancel recoverable assets ordebts
- Use the Company's assets for personal gain
- Authorizing or receiving payments for items not received or services not rendered
- Authorize or receive payments for expenses not incurred and documented
- Receiving money or gifts from suppliers in exchange for granting them a business with PTE
- Counterfeiting of any kind

RELIABLE RECORDS

We record accounting and financial information in a correct and timely manner and retain such records for as long as required by law.

CONFIDENTIALITY

In performing our work, we will have access to confidential information, including trade secrets, financial information, employee and salary information, product or process methods, among others.

Disclosing confidential information outside of PTE could harm the company's competitive position. To protect and properly use confidential information:

- We should be careful when discussing the Company's business in public, such as in restaurants, public places, airplanes, and restaurants, and when using cell phones.
- We will not leave laptop information for others to view when working with Company matters, especially when someone else can see the screen.
- We will responsibly use and protect access accounts and passwords assigned to technology resources.
- We will be aware of the responsibility shared by all, in the protection and preservation of the security in the information we manage.
- We are committed to implement all necessary and appropriate measures in our scope of responsibility to ensure that neither customer products or their processible components or raw materials nor the corresponding know-how becomes accessible to unauthorized third parties or leave the legitimate supply chain.

In PTE we are regulated under the Federal Law on Protection of Personal Data Held by Private Parties, as well as maintaining confidentiality rules towards our suppliers and customers.

The PTE privacy notice is available at the following link: <u>PRIVACY NOTICE (polymertechnik.com)</u>



EXPORT CONTROLS AND ECONOMIC SANCTIONS

PTE complies with all applicable import and export control laws, sanctions and embargoes that place restrictions on the export or re-export of goods, software, services and technology to certain destinations and prohibitions on transactions involving certain countries, regions, organisations, and individuals are subject to restrictions.

RESPONSIBLE SOURCING OF RAW MATERIALS

PTE supports activities which ensure responsible sourcing of raw materials. The procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures must be avoided.

CUSTOMER RELATIONS

All customers are treated with care, honesty and fairness, which will generate the highest level of customer satisfaction loyalty.

Customer requests are addressed in a proactive manner according to the agreed terms, with the aim of satisfying requests in a timely and accurate manner, constantly improving the quality of our service based on customer needs.

Customer information is protected with the same sensitivity as if it were the company's own information.

WORK OUTSIDE THE COMPANY

PTE employees may not accept any public or private assignment, permanent or temporary, paid or unpaid, outside the company, when the second job creates a conflict of interest with the activities they carry out during their period of employment at PTE; when an employee works in work tasks of the same nature as those performed at PTE, it is prohibited to work in a second job. To ensure that work in a second job does not cause any ethical misconduct, it is mandatory for employees to inform the Human Resources Department of the additional work activities they are performing, by means of written notice to prevent any potential harm.

If the extraordinary work activity is of a different nature or industry in which the employee is operating in PTE, the employee is authorized to work, provided that the following conditions are met simultaneously:

- Management must have assessed and approved in writing whether work in the second job would create a conflict of interest.
- The person does not perform any activity related to the second job during working hours.
- Employees may hold positions in educational institutions for the purpose of sharing their professional experiences, provided that the above-mentioned conditions are met.
- Employees may take volunteer positions with non-profit organizations as long as they do not hinder their duties within PTE.

HUMAN RIGHTS

Everyone at PTE recognizes human rights in the company in all its operations and will not accept the following practices within the company, nor do business with any person or company that performs them:

- Child exploitation, including child labour
- Physical punishment

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- Sexual abuse and/or harassment and any other form of human abuse
- Forced labor
- Trafficking in Persons
- Discrimination in employment and occupation

DIVERSITY AND NON-DISCRIMINATION

At PTE we are committed to the professional development of inclusive staff and equal job opportunities, as well as promoting decent work; in which the human dignity of all our collaborators is fully respected.

In PTE all our processes of recruitment, hiring, training, promotions and professional development, are according to the results obtained, capabilities, skills, experience, conduct and achievements, regardless of race, ethnicity, gender, physical condition, social status, nationality, sexual orientation, age, religion, disability, or marital status.

OCCUPATIONAL SAFETY AND HEALTH

At PTE we guarantee occupational safety and health at work in accordance with national regulations. We consider that the safety, health and physical integrity of our employees is paramount, taking the following actions to ensure that it is complied with:

- We are committed to providing a safe workplace
- We train staff to avoid any work risk
- Provide personal protective equipment depending on the activity to be performed.

HEALTHY WORKPLACE

We are all committed to maintaining a healthy, alcohol- and drug-free workplace.

It is strictly prohibited to consume or enter work under the influence of alcohol, over-the-counter drugs, narcotics, or any other "controlled substance" as defined by law during business hours, except when alcoholic beverages are served in connection with an authorized event.

All employees are subject to evaluations, especially if the employee appears to be under the influence of drugs or alcohol in the performance of the job, or when PTE has a reason to think that an employee is under those influences.

RESPECT IN THE WORKPLACE

At PTE we are committed to providing all employees with a dignified work environment in which the integrity of the worker is fully respected, so harassment and sexual harassment, intimidation or other inappropriate behaviors are prohibited.

All as members of PTE it is our obligation to give us due respect between co-workers either direct or to our superiors or staff in our charge, likewise, respecting us must be reciprocal and must give us due respect and correct treatment.



COMMUNICATING CODE OF CONDUCT VIOLATIONS

If you observe or become aware of a violation of the Code of Conduct, you can report it in the complaints channel confidentially and/or anonymously. Please note that if the report is false or lacks evidence, it cannot be considered a valid report.

https://app.paolamartinez.com.mx/buzon

Likewise, if you have any doubts or questions regarding the Code of Conduct or suspect any violation, but you are not sure if it is, you can use the aforementioned channel.

SCALING UP THE CODE OF CONDUCT

The Ethics Committee is responsible for investigating and resolving complaints and notifications regarding non-compliance with the code of ethics, having the following escalation:

1st Human Resources Manager 2nd Plant Manager

Human Resources will be able to advise and support you in all your doubts.

The people indicated to give attention to the whistleblowing channel must be prepared and know how to handle any concerns or reports related to the Code of Conduct following the provisions of SG IT 13 "complaint management", they have to ensure the following:

- Know and understand the Code of Conduct
- Take concerns or reports seriously
- Seek advice before responding, if necessary
- Ensure that no retaliation is exercised against any person for reporting a suspected violation of the Code of Conduct
- Maintain strict confidentiality with the reports that have been raised in the channel

ENVIRONMENT

PTE adheres to environmental laws and government requirements. Each of us must be aware of the applicable regulations, as well as know and respect PTE's policy regarding the environment.

PTE supports the sustainable use of natural resources, including water conservation, waste reduction and reuse, energy conservation, air quality and responsible chemical waste management. All of us as PTE employees must be responsible citizens; respecting the rules and regulations of the workplace in terms of the environment.

PTE takes a systematic approach to identify, manipulate, reduce and eliminate responsibly or Recycle solid waste.

PTE strives to minimize emissions of volatile organic chemicals, aerosols, ozone-depleting chemicals.

All chemicals used in PTE that pose a hazard when released into the environment are recorded in the chemical management system and stored, transported, used, reused, and disposed of safely in accordance with occupational health and safety legal regulations.



PTE supports the environmental awareness actions of its employees.

Having the following environmental policy:

"In PTE Compounding de México we are committed to the prevention and care of the environment and to compliance with the legal requirements applicable to the organization in our rubber manufacturing processes as well as the continuous improvement of our environmental management system, through the responsible and integral management of waste and the reduction of the consumption of drinking water and electricity"

SUPPLIER RELATIONS

The supplier selection process is transparent and impartial.

The confidential information and intellectual property of the suppliers with whom they do business is carefully protected.

Business is not conducted with suppliers who have been identified as not having a positive opinion regarding tax obligations as well as identified for having violated laws.

It is unacceptable for employees to receive commission payments and any tangible or intangible benefits from any supplier.

PERSONAL RELATIONSHIPS

The employment relationship is not allowed if you supervise a close family member or your partner, or vice versa, it is allowed only in cases where your partner is in a different area and the hierarchical relationship is not dependent.

QUALITY TOWARDS OUR CUSTOMERS

Quality is one of the main objectives, and all the material sent must meet the requirements and meet the expectations of our customers. Quality and safety is not the obligation of one person, or one department, quality depends on each and every one of us, and it is our responsibility to comply with safety and quality policies in the company.

Remember that your activities contribute to the achievement of quality objectives, either directly or indirectly, as well as have the same impact if we do not follow these objectives as they should.

If you notice anything that could adversely affect the safety or quality of our products, as well as if you detect quality errors in products that will be shipped to the customer, please report it immediately.

VIOLATIONS OF THE CODE OF CONDUCT

Violations of the Code of Conduct constitute serious infractions that may result in disciplinary measures, suspensions, termination of the employment relationship or legal actions by the company in accordance with, where appropriate, the Internal Labor Regulations, the Federal Labor Law, as well as any other applicable regulation depending on the type of infraction, may give rise to fines imposed by authorities, sanctions, criminal proceedings or other legal remedies.

Updated: October 2022

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