

1. The Commitment of Grupo Styropek and Its Subsidiaries

- At Grupo Styropek and its subsidiaries (hereinafter, “the Company”) we are committed to upholding the highest standards of ethics, business conduct, and social responsibility; employees (hereinafter “Employees”) of the Company must respect the legal framework, fulfill our commitments, act in good faith, honor the Company’s values, promote the interests of shareholders, promote open and effective communication, and assume responsibility in the areas covered by this Code.
- Our Clients and Suppliers are fundamental to business success. In order to offer better products and services in a responsible manner, we therefore require your organization to comply with Grupo Styropek’s expectations based on ethics, integrity, social responsibility, and their observance.
- This Code of Conduct for Clients and Suppliers (hereinafter the “Code”) sets forth our guidelines and directives regarding the products and services provided by Clients and Suppliers, aligning with the standards we maintain within our organization. Likewise, the Company acknowledges and expects that such parties will have their own Codes of Ethics and Conduct.
- You are responsible for ensuring that your personnel, both direct and indirect, know, understand, and comply with the expectations set forth in this Code.
- This Code does not supersede any agreement or obligation with the Company; it is a complement to those agreements to the extent applicable.

2. Compliance with Laws

- You must be in full compliance with all laws and regulations applicable to the operation of your business and your relationship with the Company.

3. Safety, Health, Environment, Quality and Sustainability

- The Company may carry out the necessary inspections and tests in applicable processes, in accordance with its operations. These shall be conducted properly by duly authorized and qualified personnel. Likewise, any required certification must be carried out with precision and in strict compliance with established standards.
- Furthermore, you must comply with applicable laws and regulations regarding sustainability, preservation of the environment, safety and health, and ensure that your work environments are safe and healthy for your direct and indirect employees and the communities where you operate.

4. Anti-Corruption

- All anti-corruption regulations applicable to your products and/or services in the countries where you operate must be strictly complied with.
- No form of bribery shall be carried out, whether in a personal capacity or on behalf of the Company. Consequently, you must never offer, authorize, or provide, directly or indirectly, anything with the intention or effect of inducing someone to abandon their duties and provide an unfair commercial advantage.
- You must not participate in, encourage, or incentivize unfair competition practices under any circumstances; you must never manipulate or exchange confidential information of the Company with any unauthorized third party. You must refrain from abusing your market position, whether for your own benefit or that of others, refusing to negotiate, engaging in illegal or discriminatory pricing practices, conditioning the sale or supply of a product and/or service, or engaging in abusive practices.
- You must not engage in fraudulent or disloyal practices. This means you must not provide false information about your products and/or services or those of third parties, and must avoid any statement that unjustly discredits competitors.
- You must not participate in activities, conduct business, or enter into agreements that could directly or indirectly involve the Company in money laundering or terrorism financing activities. You must comply with the applicable laws, regulations, and commercial control rules in force in the countries where you operate regarding the import, export, and transfer of goods and services.

5. Conflict of Interest

- Any act that creates or gives the impression of a conflict of interest during your relationship with the Company must be avoided. You must report to the Company any situation involving conflicts of interest, real or apparent, between your own interests and those of the Company.

6. Compliance with International Trade Regulations

- You must conduct business in strict compliance with applicable laws and regulations in force in the countries where you operate, in addition to fulfilling the contractual commitments undertaken with the Company.

7. Information Protection

- Respect the property and intellectual property rights of Styropek and third parties.
- Protect all sensitive, confidential, private, or personal information, using it only for purposes related to the business relationship, unless prior written authorization has been granted by the owner.
- Resguardar la información confidencial de Styropek bajo el principio de “need to know” y solo compartirla con quienes lo requieran para su función.
- Sign non-disclosure agreements (NDAs) where applicable and comply with local personal data protection regulations.

8. Transparency in Accounting Records and Financial Information

- Accounting and financial information must accurately reflect all transactions or operations related to the business conducted with the Company.
- Information must never be altered, concealed, or destroyed, including financial and accounting information that could alter any fact, circumstance, or transaction related to your business with the Company.

9. Human Rights

Non-Discrimination

- You must treat your existing and future clients and suppliers in a fair, inclusive manner based solely on merits and other factors related to your legitimate commercial interests, without distinction based on ethnic or national origin, religion or beliefs, skin color, physical appearance, political opinions, marital status, language, age, gender, gender identity or expression, sexual orientation, social or economic status, or disability, among others.

Child Labor

- You must ensure that child labor is not promoted, practiced, or incentivized in the performance of your activities, whether directly or indirectly related to your operations. The term “child” refers to any person below the minimum legal working age in the place where the work is carried out. Likewise, you must ensure that labor and supply chains that include forced labor or modern slavery in any of its forms are not promoted.

Human Trafficking

- You must comply with all applicable laws and regulations that prohibit trafficking, smuggling, or exploitation of persons.
- You must not engage in practices that incentivize forced labor in any of its forms or characteristics, including slavery in any of its modalities.

Labor Conditions

- You must ensure: fair compensation and benefits in accordance with applicable law, legal and reasonable working hours, clear and written contracts, and an absolute prohibition of workplace harassment in any form.
- Continuous improvement in labor practices, promoting standards within the framework of human rights.

10. Ethics and Compliance Program

- In accordance with the size and nature of your business, you must have management systems, tools, processes, and/or practices in place to:
 - a) Ensure compliance with the laws, regulations, and requirements established in this Code;
 - b) Promote awareness and commitment to professional ethical practices, without limiting this to the expectations set forth in this Code;
 - c) Facilitate timely discovery, investigation, and disclosure — whether to the Company or to third parties as applicable — and the implementation of corrective actions for violations of the law, regulations, or expectations of this Code; and
 - d) Provide training to your employees to meet requirements, including the expectations of this Code.

11. Your Business Partners

- If your contract with the Company prohibits you from assigning, delegating, or subcontracting your obligations, you must comply with said prohibition.
- If your contract with the Company allows you to assign, delegate, or subcontract your obligations, or to acquire products and/or services from third parties that will be incorporated into products and/or services purchased by us from you, we expect you to carefully select your business partners and conduct the evaluation, audit, and oversight necessary to prevent and detect improper conduct.
- Disseminate the principles set forth in this Code within your work environment and you shall be responsible for ensuring compliance with this Code.

12. Relations with Authorities

- Acts of bribery toward authorities are prohibited, including government officials, employees of state-owned enterprises or parastatal entities, as well as members of political parties or candidates for public office.

13. Code Compliance

- The Company and/or its representatives may evaluate compliance with this Code in the execution of your relationship with it, including inspections of facilities and review of information related to operations, where applicable.
- In the event of any irregularity, you must fully cooperate, including your business partners, in any investigation conducted by the Company or any competent authority, and must correct any non-compliance identified during the evaluations.
- The Company assumes no obligation to monitor compliance with this Code, and you acknowledge and accept that you are solely responsible for your compliance, as well as that of your directors, partners, employees, representatives, and other interested parties.

14. Reporting Line

- You must ensure that your employees and interested parties have adequate channels to report legal, ethical concerns, or potential violations of this Code.
- Any improper conduct by an employee or interested party of Styropek must be reported immediately to: Alpek Transparency Mailbox: <https://www.alpek.com/transparency-helpline/>
- All Clients and Suppliers commit to using this channel to report non-compliance.
- The Company ensures confidentiality, an investigation in accordance with its procedures, and a non-retaliation policy to protect the whistleblower.

15. Authorizations

Name	Position	Authorization Date
Luis Alonso Martínez Avalos	Global Sustainability Manager	Dec -15-25
Mauricio Coindreau Garza	Global Supply Chain Director	Dec -15-25
Andreas Plettner Rutishauser	President	Dec -15-25