

ANTI-CORRUPTION POLICY		Pol. 001	
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1. PURPOSE

For the Plastilene Group, the purpose of this Anti-Corruption Policy is to commit its employees and those working for or on behalf of the companies that belong to the group, to comply with all aspects concerning the applicable anti-corruption laws.

The group has "Zero Tolerance" for any conduct that could be considered a bribe or that could otherwise be considered corrupt and/or in violation of the principles of ethics, legality, respect, justice, equity, honesty, and responsibility.

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

2. SCOPE

This Policy applies to the entire business group: employees, contractors, directors or associates of the company, or any subordinate legal entity, and other national and international third parties.

3. RESPONSIBLE

Responsible areas for implementation and compliance

The Group's Presidency, in coordination with the Corporate Human Resources Management, will be responsible for approving and disseminating this policy to all business managers of Plastilene Group, so that they, in turn, may notify the other collaborators, setting up with the other processes its compliance and disclosure protocols in an integral way for all levels.

Likewise, the Group's Presidency with the Corporate Human Resources Management, other Corporate Managers, and the Business Managers are responsible for coordinating with the directors and area managers, the identification of the corruption risk levels, and the adoption of preventive and corrective measures to control any risk that has been identified.

In addition, they will supervise the implementation of this policy and will coordinate with the appropriate authorities according to the nature of the reported event, the investigation of complaints and reports concerning possible violations to enforce appropriate disciplinary procedures and/or sanctions.

Internal Audit will be responsible for supervising, overseeing, and monitoring compliance with this policy and should incorporate this liability into its control programs.

4. DEFINITIONS

- Bribe: defined as the act of giving, offering, promising, soliciting, or receiving something of value in return for an undue advantage or improper benefit, or in consideration for the performance of any

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public or private function, regardless of whether such offer, promise, or solicitation is for oneself or for a third party, in one's own name or on behalf of a third party.

- Agent: defined as a third party authorized to act on behalf of any of Plastilene Group companies. Agents include, among others, legal advisors, consultants, suppliers, general agents, commercial agents and, in general, any intermediary with the capacity to commit the companies of the Group in any type of transaction.

- For all purposes of this Policy, all agents and proxies are representatives of the company and are therefore required to comply with this policy.

- The prohibition of bribery in The Business Group includes "commercial bribery", i.e. indirect bribery which violates the laws of many countries. Commercial bribery generally involves the giving of something of value to an intermediary, for example, an employee of a customer, without the knowledge of the immediate superior of the employer of that official, with the intention of unduly influencing the business conduct of that company.

- Therefore, Plastilene Group companies and their Company Representatives are strictly prohibited from offering, paying, promising in payment, authorizing payment, soliciting, receiving or authorizing the receipt of money or anything of value, either directly or indirectly, for the purpose of obtaining, retaining, or directing business to any person or for any other improper advantage. The expression "anything of value" above mentioned includes money, gifts, entertainment, travel, services, and any other amenities.

- Some examples of prohibited payments include the giving of money, expensive or disproportionate gifts, loans, travel, discounts and so forth.

5. DEVELOPMENT

5.1. Absolute prohibition of any form of bribery

Plastilene 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 explicitly sanction corrupt conduct related to employees and former public employees as well as directors, employees, managers and advisors of private companies.

The main Colombian anti-corruption regulations are formulated in the Criminal Code (Law 599 of January 2000), in Law 1474 of 2011, known as the Anti-Corruption Statute, through which rules are

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established to strengthen the mechanisms for protection, investigation and punishment of corrupt acts and the effectiveness of public management. Likewise, Law 1778 of February 02, 2016 on the rules on the liability of legal persons for acts of transnational corruption and other provisions on the fight against corruption.

5.3. Conflict of Interest

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

5.4. Penalties for non-compliance with this anti-corruption policy

Partial or total non-compliance with this Policy will result in administrative or criminal sanctions by several national or international control authorities, as well as disciplinary sanctions established by the corporate group and/or the termination of your employment contract.

Approved
Stefano Pacini Plastilene Group President