



# CODE OF ETHICS





## Index

Code of Ethics - Grupo Envases	5	Government Relations	18
Objectives	6	Anti-Corruption	18
Reach and Scope	6	Use of the Information	19
Validity	6	Media and Social Networks	20
Compliance	7	Gifts or Presents	21
The Grupo Envases Mission Statement	8	Invitations, Events, or Courtesies	21
The Grupo Envases Vision	8	With the Competition	22
The Grupo Envases Values	8	Integrity of Financial and Operations Information	22
With Employees	9	Money Laundering	23
Recruitment	10	Environment	24
Safety	11	Communities	25
Discriminación y acoso	11	We Hear You	25
About COVID-19	12	Guidelines to Use the We Hear You Hotline	26
Conflicts of Interest	12	Internal Audit	27
Protection and Use of Assets	14	Penalties	27
Use of Drugs and Alcohol	15	Agreement Signature	29
Customer Relations	16	EXHIBIT I	31
Supplier Relations	17		





## Code of Ethics – Grupo Envases

This Code of Ethics reflects the integrity practiced by all employees working for Grupo Envases comprising Envases Universales de México (EUM) and its subsidiaries, Inversiones Zapata and its subsidiaries, Inmuebles Innovativos and its subsidiaries, and Meisa and its subsidiaries (hereinafter “Grupo Envases”), in their stakeholder relations and commercial transactions. The Code provides the basic criteria established to regulate the ethical behavior of all Grupo Envases employees and the behavior expected from third parties, customers, suppliers, and service providers with whom the Company maintains a direct relationship.



## Objectives

This document has three specific objectives:

1. To inform the Grupo Envases directors, managers, board committee members, employees, and service providers of Grupo Envases, of their ethical obligations to shareholders, investors, clients, creditors, suppliers, the competition, the authorities, the environment, and the community in general.
2. To describe general situations that may arise in relations with investors, clients, suppliers, authorities, and the community in general, that could imply an ethical conflict and the behavior expected of Grupo Envases employees in these situations.
3. To establish the procedure to penalize those who fail to comply with the provisions outlined in this Code of Ethics.

## Reach and Scope

This Code is binding for Grupo Envases, its service providers (and their employees), and all companies (and their employees) that provide services to Grupo Envases.

## Validity

This Code has been approved by the Grupo Envases Board of Directors and the Audit and Risk Committee. It will remain in force until the Board repeals it or replaces it with another Code. Modifications to the Code will also be effective from the date of their approval by the Board of Directors.



## Compliance

This document is not exhaustive. Consequently, it does not include all the situations in which an ethical conflict could arise, so any situation not foreseen in it will be resolved by Grupo Envases Management in accordance with our internal rules and the applicable laws. This is also a live document that will be updated, as necessary.

All Department leaders at all levels in Grupo Envases must be impeccable examples of compliance with this Code and are bound to constantly disseminate it and take the corresponding disciplinary measures when breached by an employee.

All Grupo Envases employees must sign a statement of full knowledge of the guidelines herein contained. All Grupo Envases employees must read and understand this Code regardless of their hierarchical level. Ignorance or a personal interpretation of the statements and policies established by this Code is not an excuse for breaking it.

Any violation of any of the guidelines outlined in this Code must be reported through the immediate supervisor, the Human Resources Department and/or the **We Hear You** hotline, whose contact information can be found in this Code.



## The Grupo Envases Mission Statement

To satisfy the industry's demand for packaging in general, providing our customers with products that meet their requirements, thus benefiting shareholders, employees, and our local communities.

## The Grupo Envases Vision

To be a total quality company in everything we do, including our plants, our products, processes, service attitude, teamwork, and throughout our entire organization, acting with professionalism and striving for excellence, as we aim to become the best packaging and related products manufacturers, in our relentless pursuit of market leadership.

## The Grupo Envases Values

Our values guide our aspiration to be a Company recognized internationally for the high-quality standards of our products and services and the performance of our people.

**Our Core Values are:**

- Quality of the products
- Service attitude
- Teamwork
- Professionalism
- Excellence and integrity



# With Employees

Grupo Envases employees are the heart and engine of our Company. We do not tolerate any inappropriate behavior such as obscene, immoral, violent, discriminatory, intimidating or similarly offensive language, gestures, or behavior.

Our commitment to our Employees is to ensure that:

- They are treated with respect, dignity, justice, and fairness without discrimination, regardless of their position in our hierarchical structure.
- Their individual rights, free identity, personality, and thinking are respected in accordance with the principles of the United Nations Global Compact to which we adhere.
- They find a suitable space for their professional and personal development, regardless of their position in our hierarchical structure.
- They can provide their services in a healthy and productive environment that fosters potential and creativity while encouraging collaboration and teamwork.
- They are not submitted to forced labor and know that they can abandon their activities once their day is over and freely resign from their jobs.

We are also committed to ensuring full compliance with the laws and regulations related to compensation and other benefits for our employees and respecting the work hours and/or days established for each position or function.

Our employee ethics include compliance with the support (alimony) obligations established by the laws of each country for their relatives and the timely confirmation of this obligation with Management at the service companies where they are employed.

We also expect employees to maintain appropriate behavior in their workplace and towards their co-workers, in compliance with the law and in line with the Company's values.



# Recruitment

## At Grupo Envases we declare that:

- The selection and hiring of personnel carried out by each applicable Company and those providing services to Grupo Envases is based exclusively on each candidate's capacity, professional experience, and level of identification with the Grupo Envases values.
- The selection process is carried out with respect and without creating false expectations. It is tailored to the cultural and legal characteristics of each country in which Grupo Envases operates.
- We do not permit the hiring of workers below the minimum age required to employ a person as a worker, according to the applicable laws of each country in which we operate.
- Employees are not obligated to deliver "deposits" or original documents at the time of hiring and have the right to access their documents freely.
- Our Privacy Policy protects our employees' personal information in accordance with the data protection laws of each of the countries where we operate.
- All employees have the right to choose their affiliation in any collective association and to participate in their negotiations.



# Safety

The physical safety of all Grupo Envases employees is our top priority. Therefore, we are committed to providing a safe work environment and consistently generating a culture that preserves our employees' physical and mental health.

At Grupo Envases, we carry out the necessary actions to provide and maintain safe workplaces and develop a safety awareness to ensure that none of our tasks or activities expose our employees to physical hazards under any circumstances.

The specific guidelines to ensure the safety of all Grupo Envases activities are contained in the Emergency Response Plan managed by each production plant as part of each manager's

responsibility working together with the Industrial Safety Department. In addition, each production plant establishes its maintenance, control, and safety guidelines according to the nature of its operation.

Under no circumstances does Grupo Envases permit completing tasks or activities that could expose an employee to a physical hazard. All tasks or activities must be carried out in strict adherence to the laws, norms, official Mexican standards, policies, and regulations applicable in the countries in which we operate, seeking to mitigate the dangers or risks to which employees may be exposed.

# Discrimination and Harassment

For Grupo Envases, respect is a fundamental value. Therefore, we do not permit any type of verbal, psychological, or physical discrimination based on sex, marital status, age, religion, race, physical abilities, political preferences, social status, sexual orientation, national origin, pregnancy, or health condition, such as diabetes, obesity, HIV, COVID-19, or any other condition. In the event of detecting any signs or suspicion of discrimination, Grupo Envases will review the case and apply the corresponding penalty.

In the same manner, Grupo Envases respects the confidentiality of the information of the employees regarding their health and medical conditions.

We aim to build a healthy environment free from any discriminatory actions towards employees, clients, suppliers and, in general, any person who does business with Grupo Envases.



# About COVID-19

Specifically in relation to COVID-19, to prevent discriminatory acts, Grupo Envases frequently disseminates official information in this regard to avoid rumors or speculations, maintaining open communication channels through briefings carried out by the Department Managers and inviting the employees to report any symptoms or suspicions of COVID-19 in order to provide timely guidance in this regard.

Grupo Envases strictly adheres to the health and hygiene protocols established by the governments in the countries where it operates to prevent the contagion of its employees both inside and outside of its facilities.

# Conflicts of Interest

A conflict of interest is when there are personal relationships of kinship (in any line or degree), friendship, patrimonial or of any other nature that prevents a director, manager, employee, client and/or supplier from maintaining objectivity in their decision-making processes where self-interest prevails over the interests of Grupo Envases.

At all times, Grupo Envases employees must perform with dedication for the benefit of the Company and all its members, without their decision-making processes being affected by any factor that favors interests that are not related to productivity, effectiveness, efficiency and meeting our goals.

## Therefore:

- Employees will watch over the Company's interests at all times and refrain from using their positions and/or Company ties to increase, directly or indirectly, their income or obtain any material benefit other than the agreed labor compensation.
- If an employee considers that there are personal interests that may influence their performance or decision-making process, or is aware of any similar behavior of another employee, they must communicate this verbally or in writing to their immediate supervisor, and the Human Resources Department or through the "We Hear You" hotline, whose contact details can be found in this Code.
- All Grupo Envases board members and board committee members, managers, and employees must report through their immediate supervisor and to the Human Resources Department or the "We Hear You" hotline, whose contact information can be found in this Code, the cases in which they are unable to fulfill the responsibilities assigned to their positions objectively because they are being pressured by a third party to use their position, authority, or influence in the Company.

Grupo Envases respects the rights of its employees and the activities they engage in outside of their workplace, which are private, by nature, provided that they do not enter into a conflict with the interests of Grupo Envases or detract from its image.



# Protection and Use of Assets

All Grupo Envases employees are responsible for caring for the Company's assets and using them only for the established purposes. These assets are described as follows:

## Physical assets, such as:

- Properties
- Machinery
- Furniture
- Tools
- Vehicles
- Office supplies
- Materials
- Financial assets

## Computer equipment and their applications, such as:

- Mobile telephones
- Tablets
- Mobile network and the Internet
- Software, hardware, SAP

## Sensitive information, such as:

- Designs
- Brands
- Patents
- Trade secrets
- Licenses
- Utility models
- Know-how
- Plans
- Processes
- Technology
- Business strategies
- Customer list
- List of suppliers
- Financial information
- Legal information
- Pricing information
- Production processes
- Logistics
- And in general, any information related to the activities carried out by the Company.

Employees are only provided with these assets to carry out Grupo Envases activities, so they are not allowed to use them for personal or unauthorized purposes or for reasons not related to Grupo Envases.

In like manner, employees are responsible for using the assets wisely, encouraging their protection and preventing their loss, damage, or vandalism.



## Use of Drugs and Alcohol

Grupo Envases strictly prohibits the use of drugs, alcohol, or any other substance, as well as carrying out activities under the influence of alcohol or psychotropic substances. In the same manner, the use or consumption of drugs or alcohol is not allowed within the Grupo Envases facilities. The consequence of appearing under the influence of drugs or alcohol and/or consuming them during the workday will lead Grupo Envases to terminate the employment of the employee involved in the case.

If an employee, supplier, or service provider is under the influence of alcohol or other drugs during their working hours, this must be reported through the immediate supervisor, the Human Resources Department, the Purchasing Department,

and the “We Hear You” complaint line whose contact details can be found in Exhibit 1 of this Code.

In the same manner, if an employee is under medical treatment or is taking medication prescribed by a physician, they will be asked to go to the Human Resources Department to provide an update about their situation to ensure awareness of their medical treatment, with the understanding that any information provided in this regard will be kept confidential and as merely informative, so that Human Resources personnel are aware of any potential side effects.

# Customer Relations

We would not exist without our customers. Their satisfaction is our success. Therefore, Grupo Envases aims to be the best option for its customers and the general market. Therefore, all directors, managers, officers, and employees of Grupo Envases have an obligation to serve them fairly, honestly, with the right service attitude, and to manufacture and deliver innovative products with the best quality within the established deadlines, always ensuring adherence to the applicable laws and the terms and conditions agreed to with each customer.

Quality, customer service, and leadership in the industry in which Grupo Envases participates are only possible with the most modern technology, which is why Grupo Envases is at the forefront of technology to offer its customers more and better products and services. Grupo Envases has committed to the relentless pursuit of technological improvements in production processes to be able to offer its customers the most innovative products.

Considering the importance of maintaining a good relationship with all customers,

## **Grupo Envases prohibits:**

- All manner of corruption, bribery, favoritism, or any activity that is contrary to good customs.
- Giving false information about the quality, availability or delivery date of its products and services to its customers and the market in general.

All negotiations conducted by Grupo Envases managers, officers, and employees with customers must be done honestly, always providing real and true information.

The Grupo Envases Code of Ethics is shared with customers. It is available on its website at [www.envasesuniversales.com](http://www.envasesuniversales.com), to ensure the dissemination of and compliance with the guidelines that all directors, officers, and employees must follow to guarantee that their practices adhere to the guidelines Grupo Envases guidelines and values.

The suspicion or confirmation that a customer is involved in unlawful or unethical acts could result in the termination of the relationship.





# Supplier Relations

One of the basic principles of Grupo Envases is to engage in relationships of trust and mutual benefit with its suppliers. Therefore, the Group is committed to carrying out honest and fair negotiations based on respect and justice while ensuring impartial supplier selections based

## Compliance with Applicable Law and Regulations

Grupo Envases asks its suppliers to comply with current money laundering, tax, environmental, or social legislation, including the protection of personal data, compliance with social security obligations and in general, with all applicable domestic and international regulations in the jurisdiction in which each Department conducts its operations.

Grupo Envases will not maintain any type of commercial relationship with suppliers involved in bad practices or that do not fully comply with the obligations established by current and applicable regulations on matters related to social commitment, from time to time, in the jurisdictions in which it operates.

## Negotiations and Contracting

Suppliers will be contracted through bidding or competitive processes. If it is considered that a given case does not warrant a bidding process, the reasons for direct contracting must be stated in writing.

Once a supplier is selected, and before beginning the contracting process, the Group employees involved must obtain the corresponding authorization in accordance with the guidelines, standards, and parameters established in the Grupo Envases management system. The contract formalizing the relationship between the supplier and Grupo Envases must be signed by the Company executives who are authorized to do so.

In terms of price, term or materiality of the product, the negotiation of the most relevant contracts must be conducted by the executives authorized to do so.

exclusively on quality and profitability criteria. It is important to note that we must abstain from any type of conflict of interest in our supplier relations, as described in the Conflict of Interest section of this document.

## Payments and Documentation

Grupo Envases is bound to pay suppliers in a timely manner for the products and/or services that they have delivered satisfactorily. In order to avoid bad practices or delays in the fulfillment of Grupo Envases' obligations, it is vitally important to ensure that all contracts and/or agreements with suppliers clearly and precisely establish the terms and conditions of payment that must consider the Group's internal processes.

In like manner, the employees involved in the supply process must ensure that the invoices and documents issued in the name of Grupo Envases comply with the statutory requirements established by current and applicable law and with internal guidelines.

## Proposals and Selection

All proposals suppliers submit to Grupo Envases must be reviewed objectively and comprehensively, considering prices, added value, quality, services, and delivery times.

All evaluation processes conducted by Grupo Envases to select suppliers must comply with the Group's internal guidelines. The manager, officer, or employee in charge of said process is bound to clearly convey the Group's needs in an explicit and truthful manner.

# Government Relations

At Grupo Envases, it is essential to comply with current and applicable regulations and act in accordance with the Group's legitimate interests at all times and in any jurisdiction of the countries in which it operates.

We know that any breach of law can cause great damage to the image of Grupo Envases, as well as the application of costly fines and even involve the commission of crimes.

Grupo Envases' relationship with the authorities must always be respectful. Therefore, all Grupo Envases executives, officers, and employees are bound to immediately respond to any requirement made by the authorities and acknowledge the powers conferred upon each authority in the regulatory framework.

Grupo Envases prohibits all acts with civil servants that could be construed as corruption or bribery.

# Anti-Corruption

Grupo Envases has implemented fair and transparent business practices to ensure compliance with local laws and regulations in the countries where it operates and does NOT tolerate any bribery or extortion practices.

Grupo Envases prohibits all bribery or extortion practices with customers, suppliers, financial institutions, concessionaires, contractors, companies, authority or government representatives or any other person or entity with whom it carries out operations.

Group directors, officers, and employees are prohibited from offering or accepting bribes or any type of unlawful payment, including money, gifts, services, discounts, trips, and meals, among others, to obtain new or existing business benefits.

Special caution should be exercised when dealing with government officials. Giving or receiving gifts, meals, travel, or entertainment to and from government officials may be considered a violation of bribery or anti-corruption laws. Whenever there is any doubt about whether a person is a civil servant, they should be treated as such.

The relationships of Grupo Envases and its employees with suppliers, customers, government entities and, in general, with any person with whom the Group does business, must be based on mutual trust, and always aim to ensure the success of the commercial relationship for both parties, free from any type of corruption at all times. Before completing a transaction in a doubtful situation, employees must report it to their immediate supervisor in writing or call the "We Hear You" hotline. The hotline's contact information is included in this Code of Ethics.

Corruption, which includes payoffs, bribery, and influence peddling, undermines legitimate business activities, distorts competition, damages a reputation, and exposes companies and individuals to unnecessary risks, which is why Grupo Envases not only prohibits but also punishes these behaviors.

Grupo Envases abides by all those international initiatives that define actions against bribery and the control of accounting records, such as the Foreign Corrupt Practices Act (FCPA).

# Use of the Information

As Grupo Envases employees, we have information provided by customers, suppliers, and employees regarding processes, products, prices, statistics, schedules, benefits, strategies, contractual terms, conditions of sale and delivery, and addresses, among others, that we need to do our jobs.

## In order to ensure the proper handling of the information:

- At Grupo Envases, all managers, officers, and employees are bound to treat, protect, and preserve the information of any third party with responsibility, ethics, and in accordance with the applicable laws in each country in which it operates and with the systems established by management.
- Grupo Envases directors, managers, representatives, and advisers are prohibited from carrying out operations for their own benefit or benefit third parties with any privileged information they possess, which is not public domain.
- At Grupo Envases, we are committed to protecting the personal information provided as part of the confidentiality of the information. Therefore, we expect reciprocal respect in all business relationships.
- All new hires joining Grupo Envases assume the obligation to legitimately use the information to which they have access with responsibility, ensuring the confidentiality and safety of information such as intellectual property and trade secrets at all times.
- Even if an employee ceases to work for Grupo Envases for any reason, they are bound to maintain this commitment, which is subject to professional ethics and by observing the laws of the countries where we operate.

If anyone inside or outside of Grupo Envases asks to share information that should be considered confidential, they must first consult the matter with their immediate supervisor, manager, and the Legal Department. This includes the use of information on social networks or graphic or written communication channels, in which its dissemination is strictly prohibited.



# Media and Social Networks

The image and reputation of Grupo Envases are a very important intangible asset of the organization to be cared for by all employees. The Group's information and corporate identity, such as its logo and trademarks, must be used carefully and in accordance with the corporate guidelines and conduct outlined in this Code.

## Therefore:

1. All information regarding Grupo Envases, its directors, products, processes, plans, strategies, and other information is considered sensitive information and, in some cases, confidential, so its display or dissemination to external media and/or social networks is prohibited.
2. No employee is authorized to publish Group profiles or use its corporate image to this end.
3. The dissemination of any information, whether textual or photographic, about the facilities, plants, offices, or any object belonging to Grupo Envases is not allowed unless necessary, in which case it requires a confidentiality agreement approved by the Legal Department.
4. Regarding the use of personal social networks, employees are encouraged to use them in accordance with the Company's values and refrain from issuing personal opinions using the Grupo Envases name and/or logo.
5. No employee is authorized to speak to the media, such as television, radio, or any type of print media outlet, or provide any type of information. For further information and details about our media communication guidelines, employees must refer to the EUM Communication Policies and Media Service Protocols.
6. All situations considered "sabotage" or "defamation" of Grupo Envases products, facilities, or brands, will be followed up in strict compliance with the law, as this could be classified as a crime.

In case of doubts in this regard or if contacted by a communication outlet requesting information, please contact the Corporate Communications Department by writing to:

[comunicacion.eum@envasesuniversales.com](mailto:comunicacion.eum@envasesuniversales.com)



## Gifts or Presents

Accepting presents, gifts, donations, or gratuities from a civil servant, contractor, customer, employee, service provider, supplier, or someone else, could create a conflict of interest, undermine our ethics, and influence our judgment or decisions performing our duties.

For this reason, at Grupo Envases, we encourage our employees not to accept any type of gift or present. In the event of doing so, the employee involved must obtain a written authorization by email from their immediate supervisor and area and or plant Manager or Director, instructing them to keep or return the gift. The corresponding Human Resources Division must be copied in the email, as they only keep a record of said authorizations.

Because we are a global company, we understand that there are localities and countries where it is customary or even a tradition to use gifts or presents as a courtesy. However, at Grupo Envases, we must be responsible for explaining our policies to our suppliers or customers concerning this matter and following the protocol described in the paragraph above.

## Invitations, Events, or Courtesies

At Grupo Envases, we strive to conduct our business in accordance with our established ethical standards. Therefore, any invitation to a restaurant, sporting, or other types of events, as well as complimentary gifts or courtesies, must be authorized in writing sent by email by the immediate supervisor and the area or plant Manager or Director, who must assess the related business or commercial justification. Once approved, they must copy the corresponding Human Resources Division, which will only record said authorizations.

It is important to note that no negotiation with our suppliers, customers or third parties should be predisposed or based on an invitation, event, courtesy, or gift.



## With the Competition

Grupo Envases uses price, quality, and service to compete in the market within a framework of integrity by respecting the competition in every aspect. Therefore, all Grupo Envases executives, officers, and employees are bound to maintain a professional attitude of respect for the competition's representatives.

In order to be able to compete, Grupo Envases cares for the quality of its products, services, and commercial strategies and carries out its activities in compliance with all laws and regulations on fair competition existing in the countries where it operates. At all times, managers, officers, and employees are bound to use true and faithful information. The use of misleading or false information is prohibited. Any breach of these obligations will be punished.

It is important to establish an open market without falling into monopolistic practices, encouraging fair competition in accordance with legal frameworks and taking into account the integrity and confidentiality of the Grupo Envases commercial strategies. Therefore, we must always aim to comply with the antitrust laws and healthy competition in all the countries where Grupo Envases is represented.

## Integrity of Financial and Operations Information

Grupo Envases ensures access to reliable and quality financial and operations information through correct and precise records containing true information reported with integrity to shareholders, executives, directors, and other stakeholders, so they can make the right business decisions and take the right actions.

All records, accounts, transactions, and financial and operations reports must be carried out in strict adherence to the accounting and financial regulations applicable to each country or region where Grupo Envases has a presence or in accordance with the authenticity of the operations performed.

All financial and operations information is considered sensitive and confidential; therefore, anyone who has access to this information must treat it accordingly.

**The following is strictly prohibited:**

- Falsify, duplicate, omit or stop registering accounts, records, financial, operations, and other types of reports.
- Deviate from the integrity of the financial and operations information since this leads to the risk of making the wrong decisions that affect the Company and everyone working in and with it.
- Distort or manipulate the records and/or accounting, administrative, legal, and other information.
- Falsify operations to simulate the fulfillment of goals or objectives or obtain a personal benefit.

# Money Laundering

Money laundering is a global problem with very serious economic and social consequences, which is why Grupo Envases has an obligation to avoid it.

All directors, officers and employees of Grupo Envases are bound to comply with the provisions of the laws and regulations regarding the prevention and identification of operations with unlawful proceeds or money laundering or similar laws and regulations of the countries in which it operates and serves.

Consequently, before beginning a business relationship with a customer, supplier or another third party, the necessary steps must be followed to identify and, where appropriate, give notices to the corresponding authorities about the performance of vulnerable and high-risk activities, as these terms are defined in the laws and regulations on the subject matter and similar regulations of the countries in which Grupo Envases operates and serves. All managers, officers, and employees are obligated to immediately inform their immediate supervisors, managers, and/or officers of any suspicious activity related to money laundering or other criminal acts.

## **Employees must pay close attention to the following items, among others:**

- Definitions and the identification of any activity or acts that could be classified as vulnerable and high-risk activities.
- Payments that could be related to money laundering, such as several money transfers, large purchases of products or operations paid with large amounts of cash.
- Customers, suppliers, or other groups that do not provide complete information or provide false or suspicious information.
- Uncommon transfers of funds that could indicate fraudulent activity.
- Several similar transactions pretending to be separated to avoid meeting certain requirements.

Grupo Envases must also comply with the applicable provisions established by the tax codes and laws and regulations, especially with respect to suppliers or vendors, service providers or third parties listed in the lists of individuals or legal entities that fail to comply with tax regulations or that are classified as companies that carry out simulated operations in the countries in which Grupo Envases operates or serves, and that could affect or damage the Group.

In addition, at Grupo Envases, we have an obligation always to stay up-to-date and informed of all new legal and regulatory provisions that may arise in the light of new schemes identified by the authorities to ensure compliance with these laws and regulations.





## Environment

At Grupo Envases, we want to contribute to a more sustainable world, so we are committed to optimizing the use of natural resources, promoting a safe environment for employees, and fostering the development of the communities where it operates.

For Grupo Envases, it is essential to promote the conservation of the environment, complying with the laws and regulations on the subject matter in each country in which it operates. **In like manner, Grupo Envases:**

- Looks for the means and technology required to reduce the impact that its operation may produce on the environment and implement and maintain the procedures it has in place to address any potential contingencies that could negatively affect the environment.
- Ensures the efficient use of the available resources at its fingertips, avoiding waste, striving to keep its productive assets in perfect working order, maximizing their capacities, and extending their useful lives.
- Has implemented and promotes environmental care through emission control, waste management, water treatment, and energy-saving measures, among others, to ensure our consistent compliance with the applicable law and the established environmental standards required to guarantee the proper operation of our plants.



# Communities

Grupo Envasés is committed to the communities where it operates, aiming to provide ways to promote their economic and social growth.

Grupo Envasés has a presence in different countries with different cultures and customs. It endeavors to understand and respect them to the extent that they do not violate the law or contradict its principles and beliefs or the terms established in this Code.

## We Hear You

All employees, directors, managers, and any person with whom Grupo Envasés has or has had a business relationship, who learns of a breach of the provisions established in this Code or any applicable regulation, have an obligation to report it through our We Hear You hotline.

**You can reach the We Hear You hotline through the following media:**

- Dial 800-0438422 from any point in Mexico
- <https://teescuchamos.ethicsglobal.com/>
- [Teescuchamos@ethicsglobal.com](mailto:Teescuchamos@ethicsglobal.com)

All complaints registered are managed by an external vendor and handled with complete confidentiality by the Internal Audit and Human Resources Departments.

The results are reported to the Audit and Risks Committee, Management, and the different Divisions, as applicable.

All complaints are handled anonymously, regardless of the complainant's request to withhold or disclose their identity or not. No other officer has access to the information contained in this system.



# Guidelines to Use the We Hear You Hotline

To ensure the proper functioning of the “We Hear You” hotline, it is of the essence to ensure the veracity of the facts reported. Therefore, we recommend that you read the following information carefully:

## What should I report?

- Workplace and sexual harassment
- Verbal, physiological, physical abuse
- Forged documents
- Fake transactions
- Information leaks
- Fraud
- Bribes
- Extortion
- Discrimination
- Theft
- Sabotage
- Consumption of alcohol or prohibited substances within the facilities or during work hours
- Inappropriate use of social networks
- Conflicts of interest

## What should I NOT report?

- Misunderstandings
- Gossip or rumors
- Personal or sentimental conflicts unrelated to work matters
- Lack of communication between employees
- Romantic relationships that are not considered a conflict of interest.

It is important to adhere to these guidelines to ensure the proper handling of all cases received through the hotline.

Any situation that is not related to a breach of the guidelines mentioned in this Code of Ethics can be reported through the Human Resources Department.



## Internal Audit

Based on the risk analysis, the Internal Audit Department is responsible for conducting periodic audits of the different plants, departments, areas, business units, processes, and operations at Grupo Envases, to be taken into account by the Grupo Envases Audit and Risk Committee, and the Board chair.

It also addresses the cases reported through the **We Hear You** hotline and follow-up through the conclusion of each case.

Therefore, all employees, directors, directors of Grupo Envases have an obligation to cooperate with these audits and investigations, providing information related to the Company, when required.

The Internal Audit Department, like all other Grupo Envases departments, strictly abide by professional ethical standards and are consistently supervised by the relevant Committees.



## Penalties

At Grupo Envases, we are sure that compliance with the Code of Ethics at all levels is fundamental to ensuring the success of our operation. Therefore, any breach will be penalized according to the severity of the case, including the termination of the document formalizing the individual's relationship with the Group.

In the event of the identification of situations of non-compliance with the legal provisions, the ethical principles outlined in this Code, and/or a considerable deviation of the functions, results or records within Grupo Envases by any employee, director, manager or third party with whom the Company has a commercial relationship, they will be punished in strict adherence with the laws and regulations in force, in addition to determining internal disciplinary measures, which could include the termination of the relationship between Grupo Envases and the employee or person in question.

Any employee who learns of a breach of the principles established in this document or of any inappropriate conduct that, although not specifically provided for in this document, implies a breach of the principles governing Grupo Envases must immediately report it through the proper channels of the "We Hear You" hotline.

Depending on the severity of the offense, the penalty will range from a written warning to a request for termination of the employment relationship or a criminal complaint filed with the competent authorities, if applicable.

The penalties are imposed by the next person in the hierarchical level above the person who has committed the breach, with the advice provided by the Human Resources and Internal Legal Departments and the external advisers deemed appropriate.



## Agreement Signature

The undersigned \_\_\_\_\_  
expressly, unconditionally, and irrevocably states that I have read  
this Code of Ethics published by Envases Universales de México,  
S.A.P.I. de C.V., and service providers. I am fully aware of its content  
and agree to abide by the terms established herein.

I also acknowledge that I am responsible for understanding, complying  
with and implementing the terms stipulated in the Code of Ethics  
and the policies established therein regarding my rank or position.  
I understand that I must also comply with the policies and guidelines  
that may apply to my specific activities or position, even when they are  
not expressly established in this Code.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Position or title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature





# EXHIBIT I

## Suppliers:

- Corporación Innovativa, S.A. de C.V.
- Técnicos Industriales de Tijuana, S.A. de C.V.
- Productividad Envases de Jalisco, S.A. de C.V.
- Consultoría y Gestión de Servicios Gerenciales Ejecutivos del Envase, S.A. de C.V.
- Administración de Servicios Técnicos e Industriales del Envase, S.A. de C.V.
- Técnicos Innovativos Los Mochis, S.A. de C.V.
- Project Management Tool, S.A. de C.V.
- Master Contractor, S.A. de C.V.
- Tapón Corona de Colombia, S.A.S.



**ENVASES**