

Disclosure Manual PTEE

Transparency and Business Ethics Program Disclosure Manual

Compilation of the PTEE

CODE	01
VERSION	PO-SGS-008
DATE	JULY 31,2024

COMPANY:

MINIPAK SAS

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DATE ISSUED:

08/23/2024



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1. Purpose of the PTEE Manual.

The Compliance Manual of the Transparency and Business Ethics Program - PTEE of MINIPAK SAS aims to disseminate the Organization's Policies against the management of the risk of Corruption and/or Transnational Bribery C/ST. In doing so, we want to make its purposes known to workers, customers, suppliers, contractors, and the general public, so that they can direct their efforts towards its application.

For MINIPAK SAS, a policy is a guideline that governs the action of a person or area in a given matter. Our policies correspond to the general statement of principles that represents the Organization's position for a defined area and that, once adopted, become non-negotiable and mandatory behavioral guidelines.

Each of the workers of MINIPAK SAS understands that their behavior has a direct impact on the reputation of the Organization. The obligation as a member of MINIPAK SAS is to understand, apply and frame their behaviour in the policies set out in this document

2. PTEE Policies.

2.1 Code of Conduct / Ethics.

For MINIPAK SAS to act ethically is to do the right thing at all times, with a criterion of rationality, avoiding waste and activities that are not related to the mission of the organization.

The ethical guidelines and other aspects related to this policy, as they are considered of high relevance for the organization, should be consulted in the document specially prepared for this purpose, called CODE OF BUSINESS ETHICS, where the detail of the guidelines governing the ethical behavior of the company is found.

2.2 Policy for the Management and Prevention of Corruption and/or Transnational Bribery C/ST.

The Legal Representative of MINIPAK SAS expressly expresses the commitment to the implementation of procedures that allow to identify, detect, prevent and mitigate the risks related to corruption and/or transnational bribery C/ST in relation to all the operations or businesses of the organization, where a national or foreign public official may intervene. To comply with the above, it will carry out the following actions:

- Provide the economic, human and technological resources required by the PTEE Compliance Officer for the development of their work.

- Implement procedures to identify, prevent and mitigate risks related to corruption and/or transnational bribery C/ST.
- Establish an anonymous whistleblowing channel that allows workers, contractors or other third parties to report any red flags or situations related to corruption and/or transnational bribery C/ST.
- Promote the anonymous whistleblowing channel of the Superintendency of Companies and the Secretariat of Transparency so that workers, contractors or other third parties can report any warning signs or situations related to corruption and/or transnational bribery C/ST.
- Develop policies and procedures aimed at mitigating the conflict of interest between workers, contractors and other counterparties, which could encourage or facilitate the commission of acts of corruption and bribery to national or foreign public officials.
- Apply due diligence processes that give scope to the periodic review of the legal, accounting and financial aspects related to a business or transaction, whose purpose is to identify and evaluate the risks of corruption and/or transnational bribery C/ST that may affect the organization and contractors. Regarding the latter, checks of their good credit and reputation should also be carried out.
- Execute the pertinent administrative and legal actions against the administrators and workers of the organization, when any of the above violates the provisions of the transparency and business ethics program.
- Lead an appropriate communication strategy to ensure the disclosure of compliance policies and the transparency and business ethics program to workers and contractors.

2.3 Due Diligence Policy.

In order to make sufficiently informed decisions on the linkage or continuity of the business relationship with its counterparties and/or business partners, MINIPAK SAS adopts as a policy the implementation of adequate and sufficient measures for its knowledge, in such a way that it can timely identify legal, accounting and financial situations related to the business or transactions carried out with counterparties evaluated with a critical C/ST risk profile, in order to identify and evaluate the risks of corruption and/or transnational C/ST bribery that may affect the organization.

In support of the above, it has defined the following guidelines:

- Any linking or contracting activity with natural or legal persons, involving payment or exchange of assets in money or kind, for any reason, must be carried out in accordance with the provisions of the PTEE manual and the SAGRILAFT manual of the Organization.
- Incorporate in the agreements it enters into with the different natural or legal persons, clauses as a mechanism for preventing the risk of corruption and/or transnational bribery C/ST, with the aim of giving legal support to the termination in a unilateral of the contractual relationship, when the other party is formally linked by the authorities to investigations for the crimes of corruption and/or transnational bribery C/ST.

2.4 Compliance Audit Policy.

MINIPAK SAS will ensure that systematic, critical and periodic reviews are carried out regarding the proper execution of the different compliance risk management systems of the organization.

The fiscal audit must include in its annual audit plan the verification of the processes and controls related to the prevention and control of compliance risks, in order to measure the effectiveness of each and every one of the stages and elements of the systems in question.

On the results and conclusions of this work, it will be an input for the PTEE Compliance Officer to establish the necessary corrective actions and include when presenting the results of their management in the annual PTEE Management report.

2.5 Procurement Due Diligence Policy.

In any case that MINIPAK SAS carries out operations as a possible acquirer, such as merger operations, purchase of shares, quotas or parts of interest or any other business restructuring procedure, the Organization will guarantee the performance of due diligence activities through an expert external firm, with the aim of identifying liabilities and contingencies related to possible acts of corruption and/or transnational bribery C/ST.

2.6 Fixed Assets Policy: Property, Plant and Equipment.

MINIPAK SAS is obliged to keep complete and reliable accounting books and records. Expenses, liabilities and contingencies must be fully and accurately disclosed in all business documentation, not only in terms of amounts, but also in terms of their nature or destination. Therefore, it is totally forbidden to create false or misleading records, or to accept from suppliers or third parties a record that does not meet our requirements.

To guarantee the above, the company complies with the procedure POC-ACF-001: Property, Plant and Equipment Policy and will also require the Tax Audit Office to include in its audit programs, verify the fidelity of the accounting and ensure that in the transfers of money or other assets made by the organization, direct or indirect payments related to corruption and/or transnational bribery C/ST are not hidden.

2.7 Policy on Gifts, Invitations and Hospitality.

Directors or employees of MINIPAK SAS, as well as third parties acting in the name and on behalf of the company, may offer gifts or invitations as a courtesy to business partners. Those who offer them must do so only in the interest of MINIPAK SAS, within the limits of its powers and delegations, for the benefit of an identified and known person, and must clearly indicate that the company is the source of the gift or invitation.

In no case should gifts, hospitality or invitations be offered that influence or give the impression of influencing business decisions.

Gifts, hospitality, and invitations should not exceed what is customary in normal business relationships. Any form of gift, hospitality and/or invitation that may damage the reputation of MINIPAK SAS should be avoided.

To ensure the above, the company complies with the Gifts, Invitations and Hospitality Policy.

2.8 Conflict of Interest Policy.

MINIPAK SAS requires, in accordance with the Code of Ethics and Policies of the Transparency and Business Ethics Program, that its suppliers, contractors, intermediaries and other third parties with whom it has business relationships act with integrity and adherence to certain ethical and conduct standards.

Likewise, it is expected that workers, in the performance of their functions and interaction with customers and suppliers, put the interest of the company before any Personal Interest or Third Party Interest, avoiding at all times seeking undue benefits through their positions or contacts in MINIPAK SAS.

Therefore, we must

- During working hours and in general in the performance of their duties, workers must devote substantially all their time to the benefit of MINIPAK SAS and avoid personal or other activities that interfere with the full fulfillment of their responsibilities.
- Except in exceptional situations, which are expressly authorized by the human resources area and the immediate supervisor, workers are prohibited from carrying out professional activities that interfere with their working time or with the performance of their duties at MINIPAK SAS.
- It is strictly forbidden for workers to participate in any business, Company or activity that competes with the business of MINIPAK SAS.
- Except in exceptional situations, which are expressly authorized by the human resources area and the Immediate Manager, workers are prohibited from participating in any negotiation or business relationship.
- MINIPAK SAS employees must prevent their personal investments from influencing or being able to influence their decisions or the performance of their responsibilities and functions in Company.
- MINIPAK SAS employees should avoid investing in a competitor of the Company.
- MINIPAK SAS employees who have discretion to enter into agreements with a supplier, customer and any other business partner should avoid investing in those suppliers or customers. Exceptions may be agreed as long as the interests of MINIPAK SAS are not affected and with the approval of the Compliance Officer.
- MINIPAK SAS employees must treat the Company's suppliers with professionalism, impartiality, objectivity and integrity.

- Every employee of MINIPAK SAS must declare to his/her immediate boss any Conflict of interest, actual or apparent, before establishing contact with a current or potential supplier.
- Workers who have terminated their employment relationship with the Company may not be suppliers (directly or through their participation in companies or businesses of any kind) for two years following the termination of their employment relationship. Exceptions to this prohibition will only be allowed in those cases in which the Presidency, human resources, and the Compliance Officer and/or whoever takes their place, justifiably considers that there are commercial reasons or reasons of benefit to the Interests of MINIPAK SAS.
- Workers must treat clients with integrity and respect and avoid any situation that represents a Conflict of Interest or undue interaction with them. The following are identified as improper practices with customers:
 - a. Asking for any kind of favor or personal compensation in exchange for better business conditions,
 - b. Offer preferential treatment in exchange for favors or personal benefits, Condition sales or commercial conditions to receive any personal benefit, among others.
- Every employee of MINIPAK SAS must declare to his/her immediate boss any Conflict of interest, actual or apparent, before establishing contact with a current or potential supplier. The Area Manager, in consultation with the Compliance Officer, will decide the situation and establish the measures to be taken.

2.9 Travel Policy.

Managers or employees of MINIPAK SAS, as well as third parties acting in the name and on behalf of the company who require travel and require travel expenses, within the national or international territory by land and/or air, must have prior written authorization from the immediate boss.

The Department Manager will make a detailed review of the concepts and budget amounts in travel expenses, considering days of stay, places, transportation, clients to visit or matters to be attended to.

For the reservation of air transport and hotel, you must use the Travel Agency or supplier with a current agreement and obtain the most convenient option. Payment must be made by corporate card. The employee must verify travel insurance on their corporate card and if they do not have such insurance, they must take it out beforehand.

To ensure the above, the company complies with the Travel Policy and the Corporate Credit Card Handling Policy.

2.10 Corporate Card Handling Policy.

Each user will be responsible for ensuring proper use of the assigned corporate card, using it only for business-related matters. In the event that it is detected that the worker uses the card for personal matters, the use of the Corporate card will be blocked, after analysis with the Presidency and Human Resources.

For no reason shall it exceed the credit limit granted. Therefore, we must consider:

- Corporate card advances are not allowed.
- Personal purchases will not be allowed.
- Do not exceed the credit quotas assigned to each of the cards. Otherwise, amounts in excess thereof will be rejected and must be reimbursed to the company immediately. The above is considered a reason for the cancellation of the credit card.

Respect the maximum ceilings authorized by the Legal Representative, otherwise the amounts that exceed them will be rejected and must be reimbursed to the company immediately.

2.11 Intermediaries and Contractors Policy.

When MINIPAK SAS requires for the development of its operations, to bind contractors as suppliers, intermediaries, agents, distributors, consultants, consultants and third parties that are parties to collaboration or risk-sharing contracts with the Organization, it may not make or promise payment other than that stipulated in the agreement, corresponding to legitimate goods or services. In any case, said payments must be adjusted to the fair market value of the goods or services legitimately received and may not exceed said amount. The amounts established in the brokerage contracts must be respected and audited with the list of payments made.

Likewise, before hiring any contractor, the designated PTEE Compliance Officer must **carry out due diligence in order to verify the suitability**, good credit or reputation of the third party, and that it does not have any impediment to relate legally or commercially with national or foreign public officials on behalf of MINIPAK SAS.

Notwithstanding the foregoing, MINIPAK SAS expects from contractors and/or intermediaries, their commitment to comply with and respect the applicable laws in this matter and to maintain the highest standards of business ethics.

2.12 Policy on Donations and Sponsorships.

MINIPAK SAS employees may make donations in the name of the company in money and/or new furniture and furnishings, observing the regular procedures and provided that such

conduct is for Donations, that is, for charitable purposes, in good faith, aimed at non-profit organizations and without such an act being able to derive benefits related to a particular act, business or transaction of the organization.

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

MINIPAK SAS makes donations to non-profit entities, as well as to associations, previously carrying out the application of the due diligence policy. In addition, each donation must always be supported with the donation certificate.

2.13 Policy on Political Contributions.

MINIPAK SAS understands by "political contributions" the delivery of sums of money, objects of pecuniary value or other benefit in favor of a political party, political candidate or a political campaign.

MINIPAK SAS agrees to make political contributions during presidential, gubernatorial and mayoral election campaigns. Contributions must have recognition of public documents of the political parties, which is accounting support.

However, MINIPAK SAS does not authorize workers to engage in the following behaviors:

- Use the Organization's time, goods, services, or equipment to carry out or support your personal political contributions.
- Manage before the Organization and in any way, the return or total or partial recognition of their political contributions.

2.14 Documentation Maintenance Policy.

In order to ensure a greater degree of collaboration with the control entities, MINIPAK SAS must keep the following documents and records related to the transparency and business ethics program, for a minimum term of ten (10) years:

- The minutes showing the approval of the policies of the transparency and business ethics program, as well as those corresponding to the approval of the adjustments or modifications made to said policies.
- Instructions or manuals containing the processes through which the approved policies and procedures of the transparency and business ethics program are implemented.
- Reports submitted by the PTEE Compliance Officer.
- The reports submitted by the Tax Auditor on the operation of the program.
- The records of the training given to the staff of the Organization on the transparency and business ethics program.
- The organisation's code of conduct
- The reports submitted by the PTEE Compliance Officer and the Tax Auditor at the corresponding frequency.
- Due diligence carried out for the hiring of contractors.

- Proof of payments to suppliers, contractors, gifts charitable donations, and other permitted or approved expenses.

2.15 Policy for updating and modifications of the transparency and business ethics program - PTEE.

The Organization establishes as a policy the review and updating of the program at least once (1) every two years, considering the needs of the Organization, new developments that are carried out and changes in the regulations issued by the control and surveillance bodies.

The modifications made must be approved by the Legal Representative.

3. Identification of Warning Signs and Reporting of an Unethical Event.

Todo Every worker and/or contractor-intermediary who is a party to collaboration or risk-sharing contracts with MINIPAK SAS, has the obligation to report in a timely manner through the channels established by the Organization when in the development of its activities it identifies a situation that goes against the principles and values declared in the code of conduct and the transparency and business ethics program for the prevention of the risk of corruption and/or transnational bribery C/ST.

To strengthen the task of identifying these situations that should be reported, some warning signs are described below that have been provided as a guide in Chapter XIII of the Basic Legal Circular of the Superintendency of Companies.

- Complex shareholding composition and with the participation of national or international private entities.
- Complex shareholding composition and with the participation of national or international public entities.
- Owning or controlling a domestic corporation without a business purpose.
- Owning or controlling a company abroad without a business purpose.
- Legal entities with structures where there are national trusts or foreign trusts, or non-profit foundations.
- Legal entities with "off shore entities" or "off shore bank accounts" structures.
- Companies not operating under the terms of Law 1955 of 2019 or that for the development of business can be considered as "paper" entities, that is, that reasonably do not serve any commercial purpose.
- Companies declared as fictitious suppliers by the DIAN.
- Legal entities where the Ultimate Beneficiary is not identified (as this term is defined in Chapter X - SAGRILAFI).
- Coincidences with public sources or lists where a natural or legal person or the final beneficiaries are involved in investigations for crimes against the national or foreign public administration or for bribery crimes.

In the analysis of transactions or contracts:

- Frequently resort to consultancy contracts, brokerage and the use of joint ventures.
- Contracts with Contractors or state entities that give the appearance of legality that do not reflect precise contractual duties and obligations.
- Contracts with Contractors that provide services to a single client.
- Unusual losses or gains in contracts with Contractors or state entities or significant changes without commercial justification.
- Contracts containing variable remunerations that are unreasonable or that contain payments in cash, in Virtual Assets (as this term is defined in Chapter X), or in kind.
- Payments to PEPs or people close to PEPs.
- Payments to related parties (Employees, subordinate companies, branches, among others) without apparent justification.

In accordance with the above, MINIPAK SAS has a Whistleblower Policy that can be consulted on its website: <https://www.minipak.co/linea-integral.html> in which the organization declares its commitment to the highest standards of ethical practices and honest relationships, as well as to the protection of those individuals who report in good faith cases or allegations of misconduct.

¿How do I report an unethical event?

An employee can report misconduct through their MINIPAK SAS Whistleblowing Hotline anonymously, located at the following website: <https://www.minipak.co/linea-integral.html>

Trasnacional External Reporting of Transnational Bribery

In addition to the internal reporting channels indicated in the previous paragraph, the workers, administrators and contractors of the company may make use of the reporting channel provided for the general public by the Superintendency of Companies to inform this Entity of any fact or situation that is related to the alleged conduct of transnational bribery.

Reports made through this channel may be anonymous and when it is not in this way, they must be treated confidentially by this Entity.

It is important to highlight that these complaints may lead to the initiation of a sanctioning administrative process for transnational bribery behaviors by the Superintendency of Companies against a legal entity or branch of a foreign company when there is merit for it.

To make a report of conduct associated with transnational bribery you can use the following link:

<https://www.supersociedades.gov.co/es/web/asuntos-economicos-corporate/channel-of-denunciations-for-transnational-bribery>

4. Dissemination and PTEE Training.

Disclosure of the Transparency and Business Ethics Program - PTEE

- The PTEE Compliance Manual and related formats are available in Spanish and English.
- For permanent consultation of workers, customers, suppliers, contractors, intermediaries and citizens in general, the code of ethics and the Anti-Bribery and Corruption Policy is published on the website:<https://www.minipak.co/linea-integral.html>
- As part of the disclosure strategy to suppliers and contractors, it is necessary that in the linking process the knowledge and acceptance of the values and ethical principles contained in the code of conduct and the PTEE Transparency and Business Ethics Program be evidenced, through the completion of the RPO-SGS-005-007 Client Registration and Update Form Legal Person and Natural Person and RPO-SGS-005-008 Supplier Registration and Update Form Legal Person and Natural Person.
- As part of the disclosure strategy to workers, the Organization through the promissory letter and/or addenda to labor contracts containing the compliance clauses of the PTEE will leave evidence of the acceptance of the Organization's general policy regarding its responsibilities and the management of the risk of corruption and/or transnational bribery C/ST and the reporting channels designed for this purpose.
- Additionally, different strategies will be carried out to raise awareness among the Organization's workers, through the different internal communication channels managed at MINIPAK SAS.

Training

- A general induction will be carried out for new workers and third parties in house (no employees of the company) who carry out activities on their behalf, both direct and those who perform their functions in the production plant. A virtual brochure and a physical version will be available for this when applicable.
- A general reintroduction will be made to workers and third parties (non-workers of the company) who carry out activities on their behalf, both direct and indirect, and to those who carry out their functions in the production plant. A virtual brochure and a physical version will be available for this when applicable. One (1) time a year.
- Specific annual reinductions on the dates scheduled by the human resources department, will be developed virtually to workers who carry out activities related to the administration, prevention and control of C/ST risk at least (1) once a year.
- Mechanisms for evaluating the results obtained, in order to determine the effectiveness and coverage of the Socialization and Training program.

The Training Program will cover at least the following aspects:

- Basic definitions of the PTEE. Current Regulatory Framework.
- Policies Transparency and Business Ethics Program
- Internal Communication Mechanisms.
- Responsibility of workers in charge of implementing prevention mechanisms and instruments.

- Sanctioning Regime.

5. Sanctioning Regime.

The PTEE manual, contains policies that must be observed in all transactions of the Organization, has been designed in accordance with the laws of the Republic of Colombia, observing the different applicable standards defined by the Superintendency of Companies. It is a formal invitation to promote and reinforce the obligation to do things correctly, it helps ensure that the Policies are fully understood, their compliance is mandatory by each and every one of the workers of the Organization.

It is the responsibility of each of the employees of the Organization to ensure strict compliance with legal provisions and internal rules and procedures. Permissive behavior in violation of rules by the boss or superior must not exist.

Workers in the commercial processes, supply and purchasing management, human talent management and management, in their daily activities must evaluate the degree of compliance with the Policies and provisions described herein, in order to detect deviations, and inform the PTEE Compliance Officer to take the necessary corrections and if necessary apply the sanctions to which it gives rise.

The application of the sanctioning regime derives from the occurrence of irresponsible, permissive, negligent, inefficient or omissive actions and attitudes in the performance of any worker that affects the Organization, said regime consists of the application of the provisions of the internal work regulations approved by the highest social body, which is fully known to the workers.

The sanctions and disciplinary actions that take place will address each specific situation and depend on the seriousness of the violation. In any case, to graduate the sanctions, the managers of the Organization will be consulted with the purpose of guaranteeing that the measures taken are equitable and guarantee the protection of the rights of the workers and of the Organization.

Prepared by:

Compliance Officer

Approved by:

Board of Directors