

CONDUCT CODE FADESA

January 2022

OUR HISTORY

Fábrica de Envases S.A. FADESA, started in 1956 under the name of IMSA, a company that in 1964 merged with other companies of the VILASECA Group.

Today FADESA, is proudly one of the most prestigious companies in Latin America, known as a pioneer and leader in the production and marketing of packaging solutions.

It has two divisions where the following products are developed:

Metal Containers:

- Welded and sausage packaging for various industries
- Metal tubes for industrial, pharmaceutical, and cosmetic products.
- Caps (type Corona, Easy Open and Pilfer Proof)

Plastic Packaging:

- Printed Polyethylene Packaging
- PET packaging
- Polypropylene Buckets
- 28mm caps
- Folding tablespoons

MISSION

To provide our customers with environmentally friendly metal and plastic packaging solutions, with the highest standards of quality and safety, through innovation, continuous improvement, and development of our human talent.

VISION

To be leaders in the Pacific - Latin America region in packaging solutions.

PURPOSE

We transform the industry.

VALUES AND PRINCIPLES

Over the years, we have developed our prestige based on the commitment to act with integrity, honesty, respect, and professionalism in the performance of our activity.

Maintaining as primary values:



Think big

We are passionate about challenges

We challenge the status quo to exceed expectations. We think big.



Generate value

We pursue excellence

We take it upon ourselves to achieve results above the circumstances. We are protagonists of success.



People

We grow together

We create safe environments that inspire trust, collaboration, and development. We forge a future.



Simple and agile

We are agile and practical

We look for simplicity and agility in what we do. We act with a sense of urgency.



Innovate

We constantly reinvent ourselves

We get rid of certainties and generate changes that accompany the growth of our customers and mark the path of the industry.

Purpose of the Code

The purpose of the Conduct Code of Fábrica de Envases S.A. FADESA is to establish the guidelines that must govern the ethical behavior of all its administrators and collaborators in their daily performance, regarding the relationships and interactions they maintain with all their stakeholders, these are the collaborators themselves, the customers, suppliers and external collaborators, shareholders, public and private institutions and society in general.

This Code is aligning with the Mission, Vision, Purpose, Values and Principles of the company, and constitutes an action guide to ensure adequate behavior in the professional performance of its employees, in accordance with both the local laws where it develops its activities and other recognized standards.

The Code reflects the principle of due diligence applied by Fábrica de Envases S.A. FADESA for the prevention, detection and eradication of irregularities related to breaches of the Code and the established internal rules. The company understands that diligence in these matters requires, among others, designing and implementing control models that regularly analyze the risks in the matters contemplated in this Code, ensure knowledge of the rules in the organization, define responsibilities, and establish procedures that allow the confidential notification of irregularities, as well as their resolution.

Scope of Application

This Code is addressed to our entire organization and to all our allies, as well as shareholders, directors, managers, employees, the community, suppliers of goods and services and, in general, companies that maintain business relationships with FADESA.

FADESA requests its suppliers, collaborating companies and counterparts to formalize their commitment to comply with the Code and with the established guidelines. In the same way, the application of the Code may be extended to any person or organization linked to Fábrica de Envases S.A. FADESA when the company deems it convenient and the nature of the relationship makes it possible; and if necessary, could verify its compliance at any time.

Commitments to Human Rights

The Human Rights Policy of Fábrica de Envases S.A. FADESA reflects the company's formal commitment to respect for human rights in its sphere of influence. In the same way, it intends to prevent any of its policies, procedures, activities, and operations from causing abuses or violations, directly or indirectly, of the human rights of persons of Fábrica de Envases S.A. FADESA or of third parties that are related to it. For this reason, we will take care of the actual and potential impacts on human rights and establish mitigation, prevention and remediation mechanisms against this issue through our Management System.

Fábrica de Envases S.A. FADESA undertakes to collaborate actively with government agencies, international organizations, civil society organizations and other institutions in promoting values consistent with the International Bill of Human Rights and other principles and statements relevant to this Policy within its sphere of influence. This policy constitutes an express position of the company on human rights in the environments in which it operates.

Commitment to people's rights

Prohibition of forced labor

Fábrica de Envases S.A. FADESA strictly prohibits the use of forced labor and human trafficking in all company operations and in our supply chain.

In this sense, the company undertakes to:

- That no person or group of persons may restrict the freedom of movement of workers within the undertaking,
- Not to use the workers' labor as a condition of the payment of a debt,
- Recognize that the worker shall have the right to terminate his employment contract freely, at any time, in the manner established in the Labor Code in force,
- The company will not be able to retain original documents of the workers such as passports, personal identifications, etc.,
- There will be no penalties, confinements, withholding of wages or punishments for those workers who decide to terminate their employment contract.

Eradicate the use of child labor

Fábrica de Envases S.A. FADESA undertakes to ensure that in none of its activities or operations there are cases of violation of children's rights and to verify, in its processes of hiring workers, that all of them exceed the minimum age to work, in all the operations of the company and in our supply chain.

In this sense, the company undertakes to comply scrupulously with the current labor legislation where it operates, international conventions and other legal and regulatory provisions of a labor nature in the field of child labor, and to implement, in those cases that are necessary, measures to ensure its total and complete elimination.

Respect for workers' organization

Fábrica de Envases S.A. FADESA, regardless of the area in which it develops its operations, respects the right of workers to organize voluntarily and independently. It guarantees not to discriminate against its members and not to influence their decisions.

Avoid discriminatory practices or practices that undermine the dignity of individuals

The people of Fábrica de Envases S.A. FADESA have the right to enjoy a decent, safe and healthy working environment. It therefore undertakes to ensure the existence of a working environment in which there is no room for discriminatory attitudes on the grounds of sex, ethnic origin, creed, religion, age, disability, political affinity, sexual orientation, nationality, citizenship, marital status, or socio-economic status.

Likewise, the company is committed to providing its workers with a work environment free of any form of harassment, intimidation, or violence in any of its manifestations.

Providing decent employment

Fábrica de Envases S.A. FADESA remunerates its employees in a dignified manner, adjusted to their skills, responsibilities and functions and aligned with the applicable legislation and with the conditions of the markets where it operates, which allows them to meet their basic needs and those of their families.

In this sense, Fábrica de Envases S.A. FADESA:

- It guarantees the right of its workers to rest and complies with the labor legislation in force in each of the environments in which it operates in terms of working hours and the right to rest.

- It will facilitate, as far as possible, flexible working practices, recognizing the need for workers to balance their working lives with other interests and responsibilities.
- It will guarantee the right of individuals to the privacy of their personal data.

Protecting people's health

Fábrica de Envases S.A. FADESA is committed to offering its workers a safe and healthy working environment by adopting advanced standards and procedures in the field of occupational health and prevention of occupational risks, from the fulfillment of the legal requirements that, in each case, are applicable.

In addition, the company will work to ensure that the applicable health and safety standards are common to all its areas of activity and comparable to the highest standards that the company applies in all its workplaces.

Commitment to business conduct and ethics

Corruption and bribery

Corruption and bribery appear when workers make use of unethical practices to obtain some benefit for the company or for themselves.

Workers must not engage in illegal payments or corruption or tolerate the offering of gifts, favors or entertainment when the purpose is or appears to be to compel the recipient.

Workers must not engage in acts of extortion, fraud, embezzlement, bribery, or unlawful commission.

A worker should make every effort to understand and determine when a payment may be legitimate and when it may constitute bribery.

In addition, if a collaborator witnesses or identifies a situation of corruption in his area of work, or among his group of colleagues, he must inform his immediate boss and the established reporting channels.

Gifts and attentions

Workers shall not give gifts or attentions intended to exercise inappropriate influence over a decision or business relationship. In the same way they will refrain from accepting attentions or gifts from third parties that have such a purpose.

Any gift that is received, as an act of courtesy, must be delivered to the Area of Talent and Culture.

Conflict of interest

A conflict of interest arises when your personal activities and relationships interfere or appear to interfere with your ability to act in the best interest of the Company.

Examples that constitute a conflict of interest, direct or indirect, among others, are as follows:

- If you carry out external business activities (not for the Company) with any seller, supplier, customer, contractor, etc. of the company.
- You or a close family member is employed by, provides services to, or receives payments from, a competitor, supplier, or customer.
- When you are offered fees for giving speeches or making presentations in connection with your work for the company
- If you supervise a close family member or your partner, or vice versa.
- If you are thinking of hiring a close family member or your partner as a worker or contractor.
- When you make contributions or payments to political parties or candidates on behalf of the company.

In any possible conflict of interest situation, ask yourself:

- Could my personal interests interfere with those of the Company?
- Could you seem that way to others, whether inside or outside the Company?
- When you're not sure, ask for advice.

Confidentiality and Privacy

Protect all non-public company information, including everything from contacts and pricing information to marketing plans, technical specifications, and worker information.

The Company respects the privacy of all its collaborators, business partners and consumers. We must treat personal data responsibly and in compliance with all applicable privacy laws.

Collaborators who handle personal information of others should:

- Act in accordance with applicable law;
- Act in accordance with all relevant contractual obligations;
- Collect, use and process such information solely for legitimate business purposes;
- Limit access to information to those who have a legitimate business purpose for viewing the information; and
- Be careful to avoid unauthorized disclosure.

Irregular payments and money laundering

The company establishes policies to prevent and avoid during its operations the realization of irregular payments or money laundering originating in illicit or criminal activities.

The aforementioned policies establish specific controls on those economic transactions, both collections and payments, of an unusual nature or amount made in cash or with bearer checks.

The workers of Fábrica de Envases S.A. FADESA will remain alert to those cases in which there may be indications of lack of integrity of the persons or entities with which the group maintains relations.

Respect for the environment

The preservation of the environment is one of the basic principles of action of Fábrica de Envases S.A. FADESA. As a result, it has defined an environmental policy.

The workers of the group must always know and assume this policy and act in accordance with the criteria of respect and sustainability that it inspires, adopt habits and behaviors related to good environmental practices and contribute positively and effectively to the achievement of the established objectives.

Workers must also strive to minimize the environmental impact arising from their activities and from the use of the facilities, equipment and means of work made available to them, while ensuring their efficient use.

Respecting indigenous communities and traditional ways of life

The company respects the rights of communities, including indigenous communities, in the places where it operates. The company undertakes to put in place the means so that its activities do not negatively influence the traditional ways of life and work of the people who live in its areas of operation.

The company is committed to evaluating and minimizing, as far as possible, the negative impact that its activity could generate on the traditional ways of life and jobs of the people who live around its areas of operation and, in particular, as a result of the environmental impact that its activity could cause.

Likewise, the company recognizes the right of communities to participate and be consulted, prior to the development of those activities that could have an impact on their traditional ways of life, in order to seek satisfactory agreements for both parties.

The participation of the communities will require impact studies that Fábrica de Envases S.A. FADESA. could develop, and its results, be transparent and that communities have access, in a timely manner, to relevant information.

In the acquisition of land, subject to the legal property regime or those used and occupied in accordance with tradition, Fábrica de Envases S.A. FADESA will compensate equitably, in accordance with local laws and practices and that the owners and users of the same receive the appropriate information prior to the acquisition.

The company undertakes to obtain free, prior, and informed consent if necessary.

Acceptance and compliance with the code

This Code is mandatory for all workers of Fábrica de Envases S.A. FADESA and for those third parties who have voluntarily committed themselves to comply with it.

The company will communicate and disseminate among all its workers, and among those third parties for whom it is relevant, the content of this Code.

All new workers must sign a recognition form confirming that they have read the Conduct Code and agree to comply with its provisions. All collaborators will be asked to perform similar recognitions on a regular basis.

In order to ensure compliance with this Code, there is a Management Committee of the Packaging Unit.

The Management Committee of the Packaging Unit may act on its own initiative or at the request of any worker of the Unit, manufacturer, supplier or a third party with a direct relationship and legitimate commercial or professional interest, by means of a complaint made in good faith.

We all have an obligation to maintain and enforce the ethical standards of Fábrica de Envases S.A. FADESA. If you notice behavior that concerns you or that may represent a violation of our Code, please report the problem immediately. By doing so, you will provide the Company with an opportunity to address and fix the problem, preferably before it becomes a violation of the law or a risk to the company's health, safety, or reputation.

You have several options for reporting issues and concerns. You can contact:

- Your immediate boss
- Social Welfare Area
- Email to: denuncia@grupovilaseca.com
- Through the corporate intranet
- Suggestion box

Reports can be made anonymously and non-retaliation against whistleblowers will be guaranteed, always maintaining confidentiality.

The Company seriously considers all reports of possible misconduct. We will investigate the matter confidentially, determine whether the Code or the law has been violated, and take appropriate corrective action. If you participate in an investigation related to the Code, cooperate fully, and answer all questions with integrity and honesty.

Violations of the Conduct Code

The Packaging Unit Management Committee makes all decisions on violations and discipline of the Code but may delegate certain categories of decision to the Management of the Business Unit.

The Company seeks to impose disciplinary measures tailored to the nature and circumstances of each violation of the Code. The Company uses a system of progressive discipline, issuing letters of reprimand for minor offenses that occur for the first time. Violations of a more serious nature may result in suspension or dismissal inclusive.

When it is detected that a worker has violated the Code, the record of the final decision and a copy of a letter of reprimand will be placed in the worker's personnel file as part of its records and will proceed in accordance with the internal work regulations.

Failure to read the Code or sign the acknowledgment form is no excuse for a worker, supplier, contractor, or business associate to violate the code.

Validity

The Conduct Code enters into force on the day of its publication to all workers and interested parties and will remain in force until its cancellation is approved. It will be reviewed and updated periodically by the Director of Talent and Culture of the Packaging Unit, at the proposal of the Management Committee of the Packaging Unit, which will consider the suggestions and proposals made by the workers and the commitments made by Fábrica de Envases S.A. FADESA in terms of social responsibility.

Approved by the President of the Packaging Unit of the VILASECA Group, January 2022.

A blue ink signature of Juan Carlos Prócel, written over a horizontal line.

Juan Carlos Prócel

PRESIDENT OF THE PACKAGING UNIT GRUPO VILASECA

Receipt and acceptance of the Conduct Code

I hereby confirm that I have read and understood the Conduct Code of the company Fábrica de Envases S.A. FADESA. I also commit myself to complying with the policies defined herein and understand that any violation of this code will be subject to disciplinary action.

Exclusive use for business associates (suppliers, contractor, customers) of Fábrica de Envases S.A. FADESA

Company Name:	
Representative / Position:	
Id number:	
Signature:	
Date:	