

CODE OF CONDUCT FADESA

February 2024

OUR HISTORY

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

In 1995, operations began in Peru through the ENORSA plant in Trujillo with the manufacture of 2-piece containers for the fishing and agribusiness segment. In Colombia, operations began in 2003 as manufacturers of fishing containers in the city of Cartagena. Currently, the operation in Peru is carried out in the city of Callao, and those in Colombia to the city of Barranquilla.

In 2021, a new factory was opened in the city of Jaramijó, Manabí-Ecuador for the manufacture of metal packaging.

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

It has two divisions where the following products are developed:

Metal Containers:

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

Plastic Packaging:

- Printed Polyethylene Packaging
- PET Packaging
- Polypropylene Buckets
- 28mm caps
- Folding spoons

MISSION

To provide our customers with environmentally friendly metal and plastic packaging solutions, with the highest quality and safety standards, 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 fundamental values:



Think Big

We are passionate about challenges

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



Generating value

We pursue excellence

We take charge of achieving 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 the future.



Simple and agile

We are agile and practical

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



Innovate

We are constantly reinventing ourselves

We detach ourselves from certainties and generate changes that accompany the growth of our clients and mark the path of the industry.

Purpose of the Code

The purpose of FADESA's Code of Conduct is to establish the guidelines that must govern the ethical behavior of our administrators and collaborators in their daily performance, with regard to the relationships and interactions it maintains with all our stakeholders, these are the collaborators themselves, customers, suppliers and external collaborators, shareholders, public and private institutions and society in general.

This Code is aligned with FADESA's Mission, Vision, Purpose, Values and Principles, and constitutes a guide for action to ensure appropriate behavior in the professional performance of our employees, in accordance with both the local laws where we carry out our activities and other recognized standards.

The Code reflects the principle of due diligence applied by FADESA for the prevention, detection and eradication of irregularities related to breaches of the Code and the established internal rules. At FADESA we understand 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, and 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 aimed at our organizations in Ecuador, Colombia and Peru, and for all our allies, as well as shareholders, directors, managers, collaborators, the community, suppliers of goods and services and in general companies that maintain commercial relations with FADESA.

We ask our suppliers, collaborating companies and counterparties to formalize their commitment to comply with this 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 FADESA, and when it deems it appropriate, and the nature of the relationship makes it possible; and if necessary we can verify compliance at any time.

Commitments to Human Rights

At FADESA, we are committed to protecting human rights in our sphere of influence, protecting the working conditions of our business partners, and fair operating practices throughout our value chain. In the same way, we intend to prevent our policies, procedures, activities and operations from causing abuses or violations, directly or indirectly, of the human rights of FADESA people or third parties who are related to us. For this reason, we will take charge of the actual and potential impacts on human rights and establish mitigation, prevention and remediation mechanisms against this issue through our Integrated Management System.

We commit to actively collaborate with government agencies, international organizations, civil society organizations, and other institutions to promote values consistent with the International Bill of Human Rights and other principles and statements relevant to the purposes of this Code within their sphere of influence. This document constitutes an express position of FADESA on human rights in those environments where we operate.

Commitment to people's rights

Prohibition of forced labor

The use of forced labor and human trafficking is strictly prohibited at FADESA throughout our operations and supply chain.

In this regard, we commit to:

- That no person or group of persons may limit the freedom of movement of workers in the company,
- Not to use the labor of workers as a condition of the payment of a debt,
- Recognize that the worker shall have the right to terminate his or her employment contract freely, at any time, in the manner established in the Labor Code in force in each country,
- Not withholding original documents of workers such as passports, personal IDs, 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

At FADESA we are committed to ensuring that in none of our activities or operations do cases of violation of children's rights occur and to verify, in its processes of hiring workers, that all of them exceed the minimum age to work, in all our operations and in our supply chain.

In this regard, we undertake to scrupulously comply with the labor legislation in force where we operate, international conventions and other labor laws and regulations on child labor, and to implement, where necessary, measures to ensure their total and complete elimination.

Respect for the organization of workers

FADESA, regardless of the area where we carry out our operations, respects the right of workers to organize voluntarily and independently. We guarantee not to discriminate against its members and not to influence their decisions.

Avoid discriminatory practices or practices that undermine the dignity of people

FADESA people have the right to enjoy a dignified, safe and healthy work environment. We are therefore committed to ensuring that there is a work environment in which there is no room for discriminatory attitudes based on sex, ethnic origin, creed, religion, age, disability, political affinity, sexual orientation, nationality, citizenship, marital status or socio-economic status.

Likewise, we are committed to providing our workers with a work environment free of any form of harassment, intimidation or violence in any of its manifestations.

Offering decent employment

At FADESA we remunerate our employees in a dignified manner, adjusted to their skills, responsibilities and functions and aligned with applicable legislation and the conditions of the markets where we operate, which allows them to meet their basic needs and those of their families.

In this sense, at FADESA:

- We guarantee the right of your workers to rest and compliance with the labor legislation in force in each of the environments in which we operate in terms of working hours and the right to rest.
- We will facilitate, as far as possible, flexible working practices, recognizing the need for workers to balance their working lives with other interests and responsibilities.
- We guarantee the right of individuals to the privacy of their personal data.

Protecting people's health

At FADESA we are committed to offering its workers a safe and healthy work environment by adopting advanced standards and procedures in the field of occupational health and prevention of occupational risks, from compliance with the legal requirements that, in each case, are applicable.

In addition, we work to ensure that the applicable health and safety standards are common to all your areas of action and comparable to the highest standards that we can implement in all our 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 FADESA or for themselves.

Workers shall not engage in illegal payments, acts of corruption, or tolerate the offering of gifts, favors, or entertainment when the objective is or appears to be to coerce the recipient.

Workers must not participate in acts of extortion, fraud, embezzlement, bribery or illegal commission.

Workers should make every effort to understand and determine when a payment may be legitimate and when it may constitute a bribe.

In addition, if an employee witnesses or identifies a situation of corruption in their work area, or among their group of colleagues, they must inform their immediate supervisor and/or through the established reporting channels.

Gifts and hospitality

Employees shall not give gifts or hospitality that are intended to exert an inappropriate influence on a decision or a business relationship. In the same way, they will refrain from accepting hospitality or gifts from third parties for this purpose.

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

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 FADESA.

Some examples that constitute a conflict of interest, direct or indirect, among others, are the following:

- If you carry out external commercial activities (not for FADESA) with any vendor, supplier, customer, contractor, etc. of the company.
- You or a close family member is employed, provides services to, or receives payments from, a competitor, supplier, or customer.
- When you are offered a fee for giving speeches or making presentations in connection with your work for FADESA.
- 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 FADESA.

In any potential conflict of interest situation, ask yourself:

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

Confidentiality and Privacy

At FADESA we protect all non-public information, which includes everything from contacts and pricing information to marketing plans, technical specifications and worker information.

We respect the privacy of all our employees, business partners and customers. We must treat personal data responsibly and in compliance with all applicable privacy laws.

Contributors who handle personal information of others must:

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

Irregular payments and money laundering

At FADESA we have established policies to prevent and avoid irregular payments or money laundering originating from illicit or criminal activities during our operations.

These 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.

Our employees must remain alert to cases where there may be indications of a lack of integrity of the persons or entities with whom the group has relations.

Respect for the environment

At FADESA, environmental protection is one of the basic principles of our operation. Consequently, we are committed to controlling, preventing and reducing the environmental impacts derived from our operations.

Our employees must understand and assume this responsibility and always act in accordance with standards of respect and sustainability, motivating them to develop habits and behaviors related to good environmental practices and to actively and effectively contribute to the achievement of the objectives set.

Likewise, our workers must strive to minimize the environmental impact derived from their activities and the use of the facilities, equipment and work tools at their disposal, trying to use them efficiently.

Respect indigenous communities and traditional ways of life

At FADESA we respect the rights of communities, including indigenous communities, and the places where we operate. We are committed to providing the means so that our activities do not negatively influence the traditional ways of life and work of the people who live in their areas of operation.

We undertake to assess and minimize, as far as possible, the negative impact that our activity could have on the traditional ways of life and jobs of the people living around our areas of operation and, in particular, because of the environmental impact that our activity could cause.

We also recognize 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, to seek satisfactory agreements for both parties.

The participation of the communities will require that the impact studies that we can develop, and their results, are transparent and that the communities have access, in a timely manner, to the relevant information.

In the acquisition of land, subject to the regime of legal ownership or that used and occupied in accordance with tradition, we will compensate equitably, in accordance with local laws and practices and that the owners and users of these receive adequate information prior to acquisition.

At FADESA, we are committed to obtaining free, prior and informed consent if necessary.

Code Acceptance and Compliance

This Code is mandatory for all FADESA workers and for those third parties who have voluntarily committed to comply with it.

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

All new workers must sign an acknowledgment form confirming that they have read the Code of Conduct and agree to abide by its provisions. All employees will be asked to carry out similar examinations on a regular basis.

To ensure compliance with this Code, there is a Steering Committee of the Packaging Unit.

The Packaging Unit Management Committee 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 uphold and enforce FADESA's ethical standards. If we observe behavior that is of concern or may represent a violation of our Code, report the problem immediately. By doing so, FADESA will provide us with an opportunity to address the problem and fix it, preferably before it becomes a violation of the law or a risk to FADESA's health, safety, or reputation

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

- Your immediate boss.
- Social Welfare Area.
- Email to the address: denuncia@grupovilaseca.com or denuncias@fadesa.com (for FADESA Peru).

At FADESA we take all reports of potential misconduct seriously. 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 a Code-related investigation, please cooperate fully and answer all questions with integrity and honesty.

Code of Conduct Violations

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

At FADESA we seek to impose disciplinary measures that are tailored to the nature and circumstances of each violation of the Code. We use a progressive discipline system, 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 even.

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 his records and will proceed in accordance with the Internal Work Regulations.

Failure to read the Code or not sign the acknowledgment form is no excuse for a worker, vendor, contractor, or business associate to violate the Code.

Validity

The Code of Conduct enters into force on the day of its publication for all workers and interested parties and will be 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 acquired by FADESA in terms of social responsibility.

Approved by the President of the Packaging Unit of the VILASECA Group, February 2024.

A handwritten signature in blue ink, appearing to read 'Juan Carlos Prócel', written over a horizontal line.

Juan Carlos Prócel

PRESIDENT OF THE PACKAGING UNIT GRUPO VILASECA

Reception and acceptance of the code of conduct

I hereby confirm that I have read and understood the code of conduct of the FADESA company. I also agree to comply with the policies defined herein and understand that any violation of this code will be subject to disciplinary action.

Exclusive use for business partners (suppliers, contractors, customers) of FADESA

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