

# COMPREHENSIVE CODE OF ETHICS AND CONDUCT

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## Letter from Our CEO

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Dear team,

I am pleased to present to you our comprehensive code of ethics and conduct. It is a framework that defines the way in which the members of the Litoplas community relate to each other and engage in national and international business, managing a safe and reliable supply chain. It defines rules of coexistence to respect each other at the workplace, facilitate the fulfillment of our obligations, and act with integrity in all local, national and foreign occasions and transactions.

Our code is inspired by the best practices in the market and undoubtedly captures in a document the essence of our community, in the form of beliefs, principles and values that have been present since our foundation, and which are still practiced by all our team members, thus protecting the reputation built and rooted as a legacy throughout our trajectory and allowing us to continue overcoming challenges together.

I invite you to read it with special attention and to assimilate it as a guide for our daily decisions and actions to generate value and trust, contributing to our higher purpose of promoting the balance and social development of stakeholders.

Best regards,



Jose Luis Mora Montero

CEO

July 18, 2019

# 1. Our Values and Higher Purpose

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## VALUES

Our values represent the beliefs that underpin our decisions and actions. They are the example that, with **genuine commitment, respons-ability and exceptional service**, every challenge is surmountable.

- ❖ **Genuine commitment**, the value that underpins our principles. We do what we do with genuine passion and gratitude. We teach by example through the strengthening of competencies related to integrity, honesty, justice, respecting the agreements with our value network, and the organizational courage to defend them.
- ❖ **Respons-ability**, the value that frames our performance. We systematically guide our strategic work networks with vision by balancing profitability and service with mature relationships of contribution & retribution based on joint achievements.
- ❖ **Exceptional service**, the value that underpins our sustainability. We act as a partner for the value network under the philosophy that 'being together is not the same as being united'. We are aware of our commitment to generating shared value, and we proactively develop unique products, processes and services.

## CORPORATE PHILOSOPHY

Our higher purpose is to be a social and viable organization, which is why we direct the team's efforts to generating trust and value for all stakeholders through the following principles:

We are pioneers in the integration of technologies, infrastructure models and operating methods, aligned with international best practices, the expectations of our stakeholders and applicable risks, producing effective and competitive results that promote maturity and our business brand.

We develop products and services that generate value for our customers and the consumer. Our relationship with customers and suppliers transcends co-development through a deep understanding of their strategic priorities to deliver technology-enabled B4B, innovative and agile solutions.

We are educational leaders. We direct people's passion and potential towards continuous learning that allows them to overcome personal and professional challenges. We provide dignified and decent work by impeccably abiding by human rights, our labor agreements, and ensuring an ethical, safe, healthy, and secure environment that promotes vitality for our community members.

We promote environmental sustainability by implementing and promoting circularity, efficiency in materials and resources and climate change management in the value network.

We comprehensively manage our processes ethically and honestly, through the adaptability of a unique business model, focused on strategic work networks and the valuation of the person as a key element of organizational learning. We identify and mitigate the risks arising from our business, we comply impeccably with all applicable legislation, codes of conduct for our clients and, in general, with the commitments made to all stakeholders.

## 2. Corporate Policies

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Our corporate policies guide the daily decisions and actions that each of us undertakes to generate trust and value by contributing to our higher purpose, promoting the balance and social development of our stakeholders:

- ❖ Consumers
- ❖ Customers
- ❖ Suppliers, creditors and contractors
- ❖ Employees
- ❖ Workers' families
- ❖ Neighboring community
- ❖ Government and industry associations
- ❖ Shareholders and the Board of Directors
- ❖ Certifying and assessment entities of the various management subsystems



### 2.1. Product and Service Development Policy

We are committed to generating shared value, which is why we are experts in perceiving the significant needs and strategic purposes of our customers. Under our **'packaging of value'** model we develop technologies that provide unique solutions to optimize the experience of use and post-consumption of packaging under a circularity and low-carbon scheme.

- ❖ Commitment to our customers

We generate trust by identifying and defining the agreed specifications through quality risk management, standardization and proactive communication, achieving the expected results from the first time, and order by request, achieving remarkable fulfillment of our agreements.

- ❖ Innovation

We add value through the development and continuous improvement of unique technologies, products, and services to solve significant market needs.

Our slogan **'Art made science'** integrates our **innovative** spirit with the **consistency** of our way of working.



## 2.2 Human Development Policy

We are **educational leaders**, so we promote among ourselves and with the neighboring community mature relationships based on a balance between **contribution & retribution**, within a healthy, safe and productive environment, through the establishment and communication of highly **humane & demanding** policies that promote the well-being and development of people.

### ❖ Human rights, labor standards and human talent management

We promote hiring of diverse and vulnerable staff, free from discrimination, harassment or any other form of abuse, respecting human rights and employees' right to freedom of association, prohibiting any form of child or forced labor in any of the operations, and providing legal, fair and equitable wages, benefits and conditions of employment. To this end, we know, understand and comply with all applicable labor legislation, our internal work regulations and our human resources management and benefits policy.

### ❖ Personal development

We create and participate in organizational experiences as **teaching & learning** spaces that contribute not only to the development of our competencies and the effectiveness of the organization, but also enrich coexistence, promote well-being and cooperation for sustainability, allowing us to transcend into better people for the community. We are convinced that if we walk together, we will overcome all the current challenges and those that are to come, because being together is not the same as being united!

### ❖ Commitment to consumers

We employ best practices in manufacturing, defense, and food safety to ensure safe packaging that prevents injuries and associated illnesses throughout the manufacturing and use chain. We know, understand and comply with quality and safety policies and procedures, always adopting best practices and managing the risks of defense and fraud to avoid unwanted changes in the characteristics of our product.

### ❖ Family and community development

Aware that **"Education is the most powerful weapon which you can use to change the world"** Nelson **Mandela**, we have established that all our community development actions must support and promote education. In our **extended value network**, we promote working together to create better possibilities for the future.

### ❖ Vitality

We preserve our safety, and that of our co-workers, contractors and visitors, by identifying hazards, assessing and permanently evaluating the risks that may arise from each of our actions, and seeking to prevent injuries and associated diseases. We do not perform tasks for which we are not properly trained or under conditions that endanger our health or that of others.

We responsibly apply the company's practices to control risks, strictly complying with legal provisions, external technical standards, the industrial health and safety regulations of Litoplas and the established

procedures regarding occupational safety and health. We actively participate in the preventive and occupational medicine, hygiene and industrial safety activities that are scheduled by the company.

#### ❖ Communications

We are committed to disseminating this and in general all the company's policies among our colleagues, workers, contractors and relevant stakeholders in order to promote respect and compliance with them.



### 2.3. Commitment to the Planet Policy

We identify and manage the environmental aspects and impacts associated with our operations, the life cycle of our products and biodiversity, promoting sustainability by seeking a balance between the satisfaction of needs and the rational use of resources.

#### ❖ Circular economy

We promote the circular use of material flows through eco-design and the implementation of a model for waste valuation and reuse of products and materials, in a manner that guarantees the closure of the cycle.

We add value to the plastic generated internally and throughout the chain through the establishment of partnerships for its pelletization, giving new life to plastic materials by turning them into raw materials for other products.

#### ❖ Eco-management

Our commitment to the planet includes, in addition to legal compliance, eco-management principles that prevent pollution and promote efficiency in the use of materials, energy and water.

#### ❖ Emissions management and offsetting

We manage our operations and relationships by promoting the reduction of the carbon footprint and promoting the consolidation of a sustainable business model.

We generate equivalences to neutralize our emissions, contributing to climate change management, and we draw up contingency plans that include adaptation to the changes produced by it.



### 2.4. Organizational Development Policy

We align our decisions and actions to our Organizational Development Model (ODM), with the aim of producing effective change and improvement, leading the organization towards the achievement of its strategic objectives. The ODM will allow us to consolidate ourselves as a creative, lightweight organization, capable of adapting to market changes, complying with legal requirements and in general with all the commitments acquired.

❖ Viable management and continuous improvement

We are **educational leaders** capable of creating continuous improvement routes, generating proactive proposals and solutions for our internal and external clients, and breaking paradigms to overcome the challenges of the environment through the **interdependent management of work networks**.

Our environment does not stop; therefore, for us the end is only a pause for learning and the beginning of a new project. So, when we innovate, we are talking about an incessant construction of the future, which goes beyond staying at the forefront of technology, product development and the integration of production systems.

❖ Risk management

We manage current and emerging trends, risks and opportunities interdependently in order to promote the achievement of organizational objectives, protect the continuity of our operations, the well-being of people and in general everything that generates value for our stakeholders.

❖ Ethics and honesty

We implement and manage transparent processes with an internal culture of prevention, detection and investigation of risky behaviors associated with the crimes of fraud, money laundering, terrorism, and channeling of resources and/or financing to the performance of terrorist activities, transnational bribery, financing and trafficking of weapons of mass destruction, cyberattacks, smuggling, theft of cargo or electronic information, narcotics trafficking, sabotage, trafficking in substances for the processing of narcotics, and any act of corruption in the international supply chain.

❖ Legal and regulatory compliance

We do our job and relate to each other by doing what is legal and also what is right for the business. We respect and comply with the trade controls and laws that regulate exports and imports of the international supply chain carried out by our organization.

❖ Transparent negotiations

We do not interact with individuals or legal entities whose behavior runs contrary to the laws, ethics and policies embodied in this code. That is why we aim to know and deeply understand our business associates according to legislation and organizational procedures.

We compete transparently within an ethical and legal framework that respects the freedom of enterprise and rejects the use of privileged information, the disclosure of inaccurate or false information about competitors' products and/or services, the execution of price fixing agreements, and in general any other activity that violates applicable competition and antitrust laws. We provide clear and truthful information for transparent negotiations.

We do not give, offer, or receive gifts, gratuities, or favors that are intended or appear to have improper influence on business decisions or that may be used to gain an unfair advantage. Commercial hospitality, including meals, entertainment, and symbolic gifts are acceptable as long as they are appropriate to the circumstances, their frequency is reasonable, and in no way involves giving money, loans, objects of high value, or any other monetary advantage.



#### ❖ Fight against corruption and bribery

We do not obtain or attempt to obtain commercial benefits or advantages through improper or illegal means. We define corruption as any act of bribery, extortion, influence peddling, fraud, embezzlement and in general any conduct that violates the Law and ethical principles.

We comply with business ethics law and international anti-bribery practices, and therefore we do not offer or promise, directly or indirectly, gifts, favors or anything else of value to government officials<sup>1</sup>, government representatives or any public or private third party in order to gain advantage in business.

#### ❖ Political contributions and participation

We do not promote or require particular political affiliations, nor do we use company funds or resources to carry out personal political activities. Corporate political contributions are strictly monitored by the registered agent and must be in abidance of applicable regulations.

#### ❖ Fight against money laundering and terrorism financing

We do business only for lawful business purposes, fully identifying our counterparty and verifying in accordance with internal procedures that the funds are legitimate. We conduct our transactions by avoiding businesses where payment is made in cash and by reporting any suspicious or attempted activity.

#### ❖ Business records

We record accounting, financial and contractual information accurately and in accordance with applicable regulations. All our transactions and financial events, regardless of their monetary amount, are duly authorized, executed and recorded.

#### ❖ Fraud

We do not intentionally conceal, alter, falsify, or omit information for our benefit or that of others; and we manage fraud risks throughout the chain through policies on the selection, evaluation and knowledge of business partners.

We do not act in the name of the company unless we are explicitly authorized to do so.

#### ❖ Company resources

We use the organization's resources responsibly and appropriately, using them for the purposes for which they were provided and protecting them against use for purposes that violate the law or internal procedures, theft, loss or damage. The company's resources include facilities, raw materials, spare parts and supplies, equipment, machinery, information systems, confidential information, intellectual property, and time.

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<sup>1</sup> Government officials include people who work for or are representatives of an entity owned or controlled by the state. Regarding anti-bribery laws, government officials also include those elected to government office at the national, departmental and municipal levels (including individuals who hold legislative, executive or judicial positions), who are part of political parties, candidates for political office, and employees of a public or state-controlled company. 1

#### ❖ Intellectual property, confidentiality, availability, and integrity of information

We properly use and protect our organization's intellectual property and its brands. Our intellectual property includes our logos, trademarks, designs, trade secrets, inventions, know-how, process or product improvements carried out by our employees, and in general any result of the work or trips carried out on the account of the company.

We assure the availability of the information for the exclusive use of the company, controlling that it is accessed only by those who have the proper authorization, protecting its integrity and ensuring that it is not used for purposes contrary to the Law, internal procedures or this code. We do not provide, disclose, alter, or allow access to or use of confidential, sensitive, unauthorized or privileged information of ourselves or our value network, to our colleagues, relatives or other third parties. We take the same care of the information shared with us by our customers and suppliers (business partners) by making good use of it. We respect and protect the intellectual property of our customers and suppliers by impeccably complying with agreements and implementing internal controls for the protection of confidential information.

Statements, publications, speeches, interviews or public appearances in any media must be authorized by the CEO of the organization and must be structured under the corporate guidelines of language and corporate image.

#### ❖ Processing of personal data

We comply with applicable laws on the collection, processing and disclosure of personal data of individuals, and we only access personal information for the purposes stated in our personal data processing policy and through the use of lawful procedures.

We employ the technical, human, and administrative measures necessary to provide security of the personal information in our system, preventing its adulteration, loss, consultation, use, or unauthorized or fraudulent access.

#### ❖ Conflicts of interest

Within the legal framework and with human dignity, we put social and organizational responsibilities before our private interests. We avoid situations that may generate conflicts of interest in commercial and labor relations.

Conflicts of interest can arise when you, a family member, or a friend:

- Use information, property, or business resources for personal gain or to benefit others.
- Engage in activities that compete or appear to compete with the interests of the company.
- Allow your work decisions to be influenced or seemingly influenced by personal, family, or friendship interests.
- Hire, supervise, or report directly or indirectly to a family member or someone with whom they are in a romantic relationship.

- Have an outside job that interferes with their responsibilities to the company or negatively affects their job performance.
- Work for, provide services to, have a financial interest in, or receive any personal benefit from a supplier, customer, competitor, or a company seeking to conduct or do business with our company, if such relationship or interest would influence, or appear to influence, their business decisions.

If any of the situations described above occur, any actual or potential conflict must be reported in a timely manner to the [integridad@litoplas.com](mailto:integridad@litoplas.com) email in order to resolve the situation fairly and transparently. Remember that having a conflict of interest does not necessarily constitute a violation of the code, but failing to report it does.

#### ❖ Responsible sourcing

We select and evaluate our suppliers based on their merits and responsible business practices, including quality, safety, occupational health and safety, labor standards, safe trade standards and environmental management that promote supply chain reliability. All our suppliers must comply with our code of conduct for suppliers and contractors as a condition of doing business with us.

### 3. Our Personal Responsibility

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#### Know, understand and comply with our code

**We are all responsible for acting ethically and adopting our code.**

All our actions and decisions must be consistent with the Law, our code and our policies, so it is the responsibility of each team member to know, understand and comply with the applicable legislation and our organizational policies for this purpose. Our code is a general framework that provides guidance for making decisions. However, it does not cover all possible situations that may arise, so we all have the responsibility to inquire before taking action to clear any doubts regarding the interpretation of the code or legal concerns. You can write your questions directly to the ethics committee via email: [integridad@litoplas.com](mailto:integridad@litoplas.com)

If your doubts are about procedures, your responsibilities, resolving conflicts with your colleagues, disciplinary aspects, you can contact the tactical leader of your process.



#### Leading by educating

**Each one of us must be an example and promoter of integrity and transparent behavior.**

All employees, especially managers and team leaders, have the responsibility to be educational leaders, generators of interdependence and commitment who guide the network with vision and example in daily activities and especially on the adoption of our code through the internalization and promotion of effective agreements that have a positive impact on society.



#### Report and cooperate

**Each of us must have the organizational courage to promote the contents of the code and report any violation of it.**

It is our responsibility to report directly or anonymously any misconduct, that is, any conduct that goes against the Law, this code and organizational policies. If we see or hear something that we believe is illegal or constitutes a violation of our code, we must report it through the authorized communications channels:

- Integrity hotline: [integridad@litoplas.com](mailto:integridad@litoplas.com)
- Directly to the ethics committee, which is made up of those acting in the capacity of CEO, trade compliance officer, AEO leader, auditor and head of legal affairs.

The following situations should be reported, among others:

- Appropriation or improper use of the company's assets.
- Accounting irregularities or false statements.
- Conflicts of interest.
- Fraud, bribery, money laundering, terrorism, and channeling of resources and/or financing to the performance of terrorist activities, transnational bribery, financing and trafficking of weapons of mass destruction, cyberattacks, smuggling, theft of cargo or electronic information, narcotics trafficking, sabotage, trafficking in substances for the processing of narcotics, drug trafficking and any act of corruption in the international supply chain.
- Participation in activities, operations or businesses contrary to the Law or this code.
- Abuse of privileged information and/or position.
- Falsification of contracts or records.
- Discrimination or harassment.
- Practices or conduct against the company's interests.
- Accepting gifts, trips, favors, or other things of value that may influence decisions.
- Security seals, containers and/or other cargo units that have been violated.
- Any unusual, suspicious or illegal activity in the international supply chain.

We respect the right to anonymity of those who report possible deviations and protect employees who report their concerns in good faith from any retaliation.

#### Cooperation in audits and investigations

It is everyone's duty to participate honestly and transparently in any internal or external audit or investigation and to provide all the information necessary to ensure that justice is served inside or outside our organization.

In the event of any request for documents, information or summonses, notify immediately to the email: [integridad@litoplas.com](mailto:integridad@litoplas.com)

## 4. Management of the Code

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### Guarantee of anonymity and non-retaliation

**All information shared through the channels provided will be confidential and will not result in any type of retaliation against the informant.**

Our company is committed to maintaining the anonymity of any person who files a question or complaint through the communication channels provided for this purpose, and to protect the rights of those who report; not to retaliate against the person who reports, seeks advice on a practice or assists in any investigation into an alleged or confirmed violation of this Code.



### Code violation investigation

**We duly analyze all information about misconducts.**

All reports of alleged or confirmed violations of our code, policies, procedures, regulations or the Law will be analyzed immediately, objectively and transparently by the ethics committee. We carry out investigation processes in accordance with applicable legislation, and we inform the competent authorities in accordance with the established reporting channels to the ethics committee and/or to our employees of the accusations against them when this does not jeopardize the investigation, respecting their right to defense.



### Disciplinary measures

**We take disciplinary action against any violation of our code.**

If you violate our code, our policies, procedures, regulations or the Law, disciplinary measures may be applied as provided in the internal regulations, or if it is a violation of a Law, civil and/or criminal penalties may be imposed by the competent authority.



### Issuance and communication of the code

**We undertake to communicate the provisions of this code in our RTE.**

As mentioned above, our code is a reflection of the philosophy, values and principles of our organization, effective as of **July 18, 2019**, making its issuance known through its publication on our website, intranet, digital tool of the management system and the other internal communication channels available such as employee orientation and retraining sessions.

We continuously analyze the content of this code to ensure that it remains aligned with the company's strategy and applicable laws and commitments.

**CHANGE CONTROL**

Date	Current version	Change made	Change requested by
11/20/2013	02	The concept of corporate philosophy is redefined as MT&EG.	OHD Manager (Alessandra Mejía)
12/11/2015	03	The MT&EG concept is redefined as Integral Management Policy.	OHD Manager (Alessandra Mejía)
05/31/2015	04	Fulfillment of commitments of any type made with our stakeholders is specified. The component of prevention of ML/TF risks is included.	OHD Manager (Alessandra Mejía)
02/20/2017	05	<p>* The ethical component is included. * The policy is redesigned. Specifically, 2 paragraphs, items 6 and 7 are deleted because they were already included in others and/or the level of detail was no longer considered for this Litoplas statement.</p> <p>* Certain paragraphs are reorganized in a more logical order.</p>	OHD Manager (Alessandra Mejía)
04/05/2017	06	* The term “we value” is replaced for “we preserve” in paragraph 5. The “B to B” concept is updated to B4B in paragraph 2.	OHD Manager (Alessandra Mejía)
09/29/2017	07	Topics are included related to continuous improvement aligned with risk management, the scope of environmental management is expanded from pollution prevention to the implementation of circular economy practices. *The sequence of policy components is rearranged according to the logical flow: Social responsibility - Economic - Environment - Innovation and improvement.	OHD Manager (Alessandra Mejía)
05/25/2018	08	The third paragraph includes the identification of hazards and the permanent assessment of risks.	Head of Process Development – Lina Borrero
07/18/2019	09	The concept of comprehensive management policy is redefined, elevating it to the level of a comprehensive code of conduct which incorporates all the policies on behavior according to best market practices.	Organizational and Human Development Manager – Alessandra Mejía
03/30/2020	10	*A commitment to economic and environmental development is included in the philosophy to emphasize the three	Organizational and Human Development

		<p>dimensions of sustainability.</p> <p>*The stakeholders of Litoplas are specified.</p> <p>*Greater emphasis is given to the viable management and process innovation policy.</p> <p>*The family and community development policy is included in the code.</p> <p>*The order of policies is reorganized.</p>	<p>Manager – Alessandra Mejía</p>
01/06/2022	11	<p>The code is updated by adding/modifying terms to make it a more corporate code, expanding on sustainability issues and other AEO requirements:</p> <p>* The Code of Conduct is renamed to Comprehensive Code of Ethics and Conduct.</p> <p>* Changes are made in the corporate philosophy, expanding on environmental and technological aspects.</p> <p>* Text is added to the Letter from our CEO. It mentions low-carbon and business partners in the policy of developing products, services and value network.</p> <p>* The model and eco-design are mentioned as a guarantee of closing the cycle of circular use of materials.</p> <p>*A risky conduct is added to the ethics and honesty policy, “Financing of weapons of mass destruction”.</p>	<p>Alessandra Mejía – Organizational and Human Development Manager</p>
05/05/2022	12	<p>-In the letter from our CEO and in the item of responsible sourcing of the product development policy, safe trading standards terms are included such as the supply chain and the associated business concept for planning with the requirements of AEO and BASC.</p>	<p>IMS Specialist- Diego Vargas</p>
		<p>- The scope of the code of ethics is broadened in terms of information security as part of the corporate policy of ethics and honesty.</p> <p>- The alcohol and drugs policy becomes part of the HSEI Priority Risk Prevention Policy as a strategic policy, because it is not at the level of a corporate policy.</p> <p>- New specific reporting situations of the BASC and AEO are included: “Security</p>	



		<p>seals, containers and/or other cargo units that have been violated.” “Any unusual, suspicious or illegal activity in the international supply chain.”</p> <p>- The AEO Leader is added as another channel to which to report complaints in situations of safe trade aligned with the provisions of the AEO and BASC requirements. In the management of the code, it is added that the report must be reported to the competent authorities.</p>	
08/17/2022	13	<p>* The risks in the international supply chain were specified, such as drug trafficking, narcotics trafficking, terrorism, cyberattacks, sabotage, among others.</p> <p>* The list of the channels of communication with the competent authorities by the ethics committee is included.</p> <p>* An adjustment is made in the last paragraph of policy 2.2 Viable management and process innovation policy.</p>	IMS Specialist-Diego Vargas
10/18/2022	14	<p>The certifying and assessment entities of the various management subsystems are included as interested parties.</p>	IMS Specialist-Diego Vargas
12/02/2022	15	<p>* The business philosophy is updated in alignment with the higher purpose and corporate strategy.</p> <p>* Creditors and contractors, industry associations and the Board of Directors are included as stakeholder groups.</p> <p>* Code policies were reordered in alignment with the strategic pillars of the enterprise maturity matrix. The policy of commitment to the customer's consumer and product innovation are separated from process innovation.</p> <p>* Greater emphasis is given to communication policies, commitment to the planet, emissions management and offsetting, and risk management, creating them as specific items.</p> <p>* Some terms are updated to give corporate scope and alignment with the IMS.</p>	Head of Corporate Strategy and Development