

# Code of Corporate Conduct

In  **amtex**  
we all have a  
**common North**



## Social Responsibility

Strategic  
Direction

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*Our experience, your tranquility*



# Mission

About us?

We are the leaders in the development, production and commercialization of **cellulose ethers, functional polymers, compounds and supplies** for diverse industries. We manufacture our products based on high **quality and performance standards** that meet our customers' current and future expectations.

Our **competitive prices** enable us to remain in the global market within a **sustainable development** framework, thanks also to our **highly qualified staff** and the state-of-the-art technology we use in all our processes. This allows us to generate profitability for our shareholders, **optimize our resources and protect the environment.**



# Vision

## Where are we headed?

By 2020, the **cellulose ether production plant** (located in Medellín, Colombia) will be the Latin American leader in the production and commercialization of CMC, and the **functional polymer production plant** (located in Itagüí, Colombia) will maintain its position as an **excellent alternative for both the local and international** market in the provision of supplies for the chemical chain by developing **products and services that foresee and meet the needs and expectations of our customers.**

In summary, both production plants will be first-class options in the market due to their cost-benefit ratio, high-quality service, **high innovation level, cutting-edge research work, response agility, and logistics capability.**





Fairness  
Honesty  
Loyalty  
Service-driven  
**attitude**  
Safety  
Innovation  
Customer satisfaction  
**Quality**  
Continued improvement  
**Respect**

commitment

A close-up photograph of a vibrant green leaf with several clear water droplets resting on its surface.

**Values**

# Comprehensive Policy

This is how we state our principles  
as an Organization

Consistent with our mission, vision and values, and with a purpose of continued improvement, in Amtex we permanently watch over the fulfillment of our standards, which we have established in the Management Systems. The ultimate objective is to ensure the quality of our processes, generate profitability by means of a sustainable growth, and perform actions focused on preserving the health and safety of all our employees.

We strive to protect the environment, maintain an open communication with all our stakeholders, act with transparency and traceability to foster secure commerce in the worldwide context. For doing this, we rigorously comply with all governmental regulations, and promote the professional and personal development of our staff. Furthermore, our strong and solid principles confirm our corporate social responsibility.



# Comprehensive Policy

Therefore, we are deeply committed to:

- **The safety and health at the workplace:**

We are committed to our Workplace Safety and Health Management System for managing all work-related risks. That is why we have developed actions to prevent the use of psychoactive substances, alcohol, drugs and other addictions, and we foster healthy lifestyle habits to preserve the good health of our employees. Additionally, we strongly promote self-care, as well as the prevention and control of the conditions that generate risks, improving thus the quality of life of our employees and ensuring the delivery of our products safely and with a high standard of quality.

- **The environmental management:**

We watch over the rational use of natural resources and mitigate the environmental risks and the impact of our production on the environment.

- **The transparency and business ethics:**

We have an efficient management policy in place, which mitigates to the maximum extent the risks associated with the laundering of assets and terrorism financing, and we have established an ethics channel that allows to inform any irregularity that undermines the Company's principles.





# Comprehensive Policy

- **Secure commerce:**

We have implemented the BASC regulations with the purpose of fostering a secure worldwide commerce by means of the normalization and standardization of procedures in the sourcing chain. We have also adopted preventive measures aimed at preventing the development of unlawful activities.

- **Food security:**

Our processes in the production of CMC for regulated markets (pharmaceutical, food and personal care) are developed through good manufacturing practices that guarantee product innocuousness and safety, and customer satisfaction.

- **The social responsibility:**

We contribute to the comprehensive development of our employees, their families and the community, always striving to improve their quality of life, the social development and the environmental balance.

Moreover, we ensure the disclosure, understanding and availability of this Comprehensive Policy by promoting its fulfillment at all the levels of the Company, including employees, suppliers, shareholders, the state and the community.





# Management Objectives

- To offer optimal-quality products focused on meeting the needs of our customers.
- To understand the global needs of our customers and proactively act and operate in order to ensure their current satisfaction and their future expectations.
- To achieve sustainable environmental development for the Organization.
- To achieve an adequate profitability for the shareholders.
- To promote the comprehensive development of the human talent by recruiting and keeping the ideal personnel.
- To identify, evaluate and assess the hazards and risks inherent to the work activities, maintaining the integrity of the workers during their work shift.
- To implement and apply safety and security measures in our processes to prevent the emergence of any possibility of unlawful activity.
- To continuously improve our processes.
- To ensure the innocuousness and safety of our products from the food and pharmaceutical lines.



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# Code of Corporate Conduct



# Code of Corporate Conduct

This is how we operate in Amtex,,  
with integrity and based on ethics.

By being part of Amtex, we have the fortune of working for a trustworthy Organization with more than 50 years of experience in which it has built itself a reputation of a responsible and honest Company with a strong culture of integrity and ethics. This reputation allows us to hold an excellent commercial and corporate image both locally and internationally.

Our customers value the quality of the products we offer them; our suppliers, customers and allies trust us; and our employees feel we are part of a Company that supports us and improves our quality of life. This perception is the result of our corporate behavior, which has been long based on honesty and social responsibility.

For this reason, and being convinced that sustainable development is only possible within a framework of respect and fairness, we have developed this Code of Conduct. It establishes the guidelines that we have as a Company for operating ethically and transparently, strictly abiding by and complying with the Human Rights, where the justice for and dignity of all the people who create or receive the impact of our Company's operation takes precedence.

The following concise chart contains all our responsibilities as a Company and as employees, as well as the guidelines that our suppliers, customers and allies must follow in order to ensure unified criteria in our corporate behavior in the eyes of society.

## This Code states **our commitments:**

### **As a Company**

- To disseminate and comply with the Code.
- To fulfill all applicable regulations.
- To handle and manage the financial and commercial information transparently.
- To protect the information.
- To act and operate transparently.
- To respect and abide by the Human Rights and the labor rights.

### **As an employee**

- To know and comply with the Code.
- To have a respectful and dignified behavior.
- To protect the resources of the Company (goods and time).
- To protect the information.
- To report any and all conflicts of interest.
- To act and operate transparently.

### **As suppliers, customers and allies**

- To know and comply with the Code.
- To conduct transparent recruitment processes.
- To respect and abide by the Human Rights and the law.
- To protect the information.
- To act and operate transparently.



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**As a Company,  
we are committed to...**

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# As a Company, we are committed to...

## Disseminating and complying with the Code by:

- Making proper use of this Code of Conduct and complying with the Law.
- Creating an environment where employees feel comfortable to raise any concern without fear of any type of retaliation.
- Assessing the behavior based on this Code of Conduct and other policies established by the Company when evaluating the employees.
- Never giving orders to the employees for achieving results at the expense of an unethical behavior or by breaching this Code of Conduct and/or the Law.
- Guaranteeing that people understand their responsibilities established in this Code of Conduct, as well as the Comprehensive Policy of the Company.
- Establishing and promoting bidirectional communication mechanisms and channels so that employees can state their claims without any kind of fear of retaliation, and guaranteeing said claims are addressed both adequately and timely.

## Handling and managing the financial and commercial information transparently by:

- Guaranteeing the precision of all the commercial and financial records of the Company.
- Assuring the Company complies with its legal and regulatory obligations.
- Never falsifying any documents or distorting the true nature of a transaction.
- The Company respects the privacy of all its employees, commercial allies and customers.
- We must manage personal data with responsibility and in compliance with all the applicable privacy laws.
- When information on our competitors is gathered, shared and used, it must be done legally and ethically, and the non-public information of other companies must be respected.
- Not participating in illegal or unlawful activities to obtain information on competitors. This includes theft, eavesdropping, listening to phone calls, computer hacking, invasion of privacy, bribery, misrepresentation or distortion, and searching for documentation in the garbage.

## Acting and operating with transparency, and implementing the anti-bribery policy:

- The Company must comply with all the applicable commercial regulations established by the State, which forbid it to participate in certain commercial activities or in interactions with identified terrorist or drug-trafficking organizations.

## As a Company, we are committed to...

- Competing legally and complying with all the applicable trade competition laws.
- Forbidding fraud, bribery, extortion, corruption, illegal acts, fund misappropriation or hiring people who operate outside the law.

## Respecting and abiding by the Human Rights and the labor rights by:

- Operating ethically and responsibly in all business transactions and activities, watching over the respect for both people's and environmental rights.
- Protecting and respecting the rights of all employees who have reported a concern or corporate problem via the Ethics Line or who have participated in an investigation. This cannot be the basis for an action that adversely affects the employee, such as dismissal, demotion, suspension, loss of benefits, threats, harassment or discrimination.
- Allowing the employees to choose their employment freely, fulfilling their ordinary working hours, respecting the decision of submitting their resignation, and paying their definite settlement without demanding any kind of money amounts and without withholding personal documents.
- Respecting the freedom of association and the right to collective bargaining.
- Providing a safe, secure and clean working environment, always considering the good manufacturing practices. All necessary measures will be taken to prevent accidents and adverse effects on the health of the employees related to or associated with the job or that would happen during the work hours.
- Not hiring child labor, or employing young people under 18 years old for night shifts or in hazardous conditions. These policies and procedures will be aligned with the regulatory provisions of the ILO.
- Paying a decent wage to all employees. Both the wage and the social benefits must comply with the national legal regulations.
- Providing all employees with understandable information about their working conditions in relation to their wages or salaries before they accept the job, and providing information about the details of their wages or salaries during the payment term under consideration, every time they earn them.
- Not discriminating when hiring, compensating, training, promoting, dismissing or retiring its employees based on race, nationality, religion, age, disability, gender, marital status, sexual orientation or labor union or political affiliation.
- Not abusing or performing physical punishment, physical abuse threats or sexual or any other type of harassment, neither verbal abuse or any other type of intimidation.



## As a Company, we are committed to...

- Respecting the dignity and the values of every person.
- Respecting pregnant women's jobs.
- Preventing work harassment. For this purpose, the Company created the Work Coexistence Committee, to which employees can report any act that constitutes work harassment in order to take the measures established by the law.
- Respecting the staff's rest time (lunch break, etc.) based on the time table established for such purpose.
- Respecting all fundamental rights: to life; safety and freedom; privacy and honor; freedom of thought, conscience and religion; freedom of expression; social security; quality of life; free time and rest; cultural life and recreation; and the elimination of all kinds of employment and occupation discrimination.



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**Our employees  
are committed to...**

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# Our employees, are committed to...

## Knowing and complying with the Code by:

- Knowing Amtex's Code of Conduct, abiding by it and the law anywhere, and using good judgment to prevent any inadequate behavior.
- Being examples of the adequate behavior.
- Acting with the loyalty, good faith and diligence of good businesspeople, putting Amtex's interests ahead of personal interests.

## Having a respectful and dignified behavior by:

- Not using alcohol, drugs or any other type of hallucinogenic substances in the work environment or when representing the Company.
- Respecting the time assigned by the Company for resting and having food at the cafeteria of the food service provided by the Company.
- The employees who must wear uniforms due to their job specifications must use them adequately, neatly and cleanly and only at the Company's facilities.

## Protecting the resources of the Company (goods and time) by:

Protecting the property of the Company and not using it for the personal benefit of the employees or any other person or organization different to Amtex.

- The theft of any of the Company's property, whether it is an unauthorized withdrawal of products, equipment or information owned by the Company, or embezzlement or deliberate false information, may constitute grounds for dismissal and even may give rise to criminal proceeding.
- Not participating in personal activities during the work hours that would interfere or hinder the fulfillment of the job responsibilities.
- Not using the Company's computers and equipment for external businesses or for illegal or unethical activities such as gambling, pornography or other offensive matters.

## Our employees are committed to...

### Protecting the information:

- All employees are bound to protect the Company's non-public information at all times, both outside the workplace and during the working hours and even after the employment relationship is terminated for any reason. Said information includes from contacts and price information to marketing plans, technical specifications and employee information, except when required for commercial purposes. Even in that case, all employees must take the adequate measures. For example, the execution of a confidentiality agreement with the purpose of preventing the wrongful use of information.
- All employees must report any and all conflicts of interest:
- When your personal activities and relations interfere or seem to interfere with your capability to act or operate in favor of the best interests of the Company, you must immediately inform it to your supervisor.
- When selecting suppliers, you must always follow the Company's applicable contracting guidelines. Said selection must be completely free of any conflict of interest.
- As an employee, you are not allowed to provide services in any other way or to receive payments from any customer, supplier or competitor of the Company.
- The personal relations at the workplace must not affect in any way your capacity to act or operate in the best interests of the Company and they must not adversely affect any work-related relations. Work related decisions must always be based on the assessments/ratings, the performance, the skills/capabilities and the experience.

### Acting and operating transparently by:

- Not accepting or asking for gifts or any other type of hospitalities from customers or suppliers if doing so could compromise their capability to make objective commercial decisions for the benefit of Amtex.
- Not accepting or asking for hospitalities in exchange for doing something or making promises to a customer or supplier. Regular business dinners and invitations to local sports events are acceptable in general.
- If politely rejecting a hospitality could offend the person who offered it or if the circumstances the hospitality was delivered impede its return, you may accept it, but you must inform it to your supervisor.
- Gifts with symbolic value and those whose purpose is being used in advertising may be accepted. For example, trophies and figurines with inscriptions recognizing a commercial relation.
- Not offering, promising or giving anything to a customer or supplier in exchange of getting an inappropriate advantage for the Company.



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A woman with blonde hair tied back, wearing a light blue tank top and a white towel draped over her shoulder, is shown in profile drinking from a clear plastic water bottle. The background is a bright blue sky. The image is framed by a blue curved border at the top and bottom.

**Our suppliers, customers  
and allies are committed to...**

 **amtext**

# Our suppliers, customers and allies are committed to...

## Knowing and complying with the Code by:

- Knowing Amtex's Code of Conduct, abiding by it and the law anywhere, and using good judgment to prevent any inadequate behavior.
- Being examples of the adequate behavior.
- For the formalization of a commercial relationship with the Company, all suppliers must state their commitment to comply with this Code. All suppliers must also accept to allow Amtex to verify said compliance at any time.

## Conducting transparent recruitment processes:

- The selection and contracting of suppliers of goods and services must be performed in accordance with the criterion of free concurrence in the market and the improvement of the efficiency and profitability of the Company, within the principles of respect, transparency, loyalty and good faith, as well as the healthy business practices.

## Respecting the Human Rights and complying with the regulations by:

- The Company will only hire suppliers that are legally incorporated, responsible with the respect for fundamental rights, the environment, the labor standards, the fight against corruption and the compliance with the legal regulations in force that comprise, among other, the regulations related to the health and safety of employees and to the prohibition of child labor. All suppliers must promote said responsibilities among their own suppliers, subcontractors and all other stakeholders.
- Complying with the environmental regulations. All of our suppliers must seek the way to minimize the environmental impact on all their operations. All of our suppliers must also work on their continued improvement and on the implementation of management systems that favor the optimal use of the natural resources.
- Strictly respecting both the Human Rights and the labor rights of all employees, including their freedom of association and the right to collective bargaining. All of our suppliers must only hire workers who are legally authorized to work at their facilities. Child labor is completely forbidden and each company is responsible for validating the suitability of their workers by checking the corresponding documentation.
- Acting and operating with dignity, respect and integrity in the relations with the employees, ensuring them fair working hours and the statutory resting days, salaries, social benefits and other benefits as of the law in force.



## Our suppliers, customers and allies are committed to...

### Protecting the information:

- All the information handed over and shared with the suppliers as the result of a commercial relationship is confidential and reserved and can only be disclosed with Amtex's explicit authorization. In the pertinent cases, the execution of a confidentiality agreement will be requested.

### Acting and operating transparently by:

- Operating with integrity and respecting the applicable laws, fully avoiding bribes and acts that are unlawful, illegal or opposed to this Code which would give rise to fraudulent practices.
- Not accepting or promoting any type of corruption, including extortion and bribery, and being committed to report them and to conduct preventive actions in this regard.
- Not giving gifts or hospitalities intended to exert an inappropriate influence on a decision or a business relationship.
- Always negotiating in an honest way with customers, suppliers and consumers, and treating them with honor and respect.
- Not engaging in disloyal, deceitful or confusing practices.
- Always presenting Amtex's products in an honest manner.
- If a conflict of interest is identified, the supplier must ensure Amtex knows about it as soon as possible.

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**Our Ethics Line is  
available to everyone**

# Our Ethics Line is available to everyone

**If you may ever have any kind of doubt about a conduct, act or behavior, ask yourself:**

Is it consistent with this Code?

Is it ethical and legal?

Will it adequately reflect my image and that of the Company?

**If the answer to any of these questions is “no,” don’t do it!**

If you still have any doubts, ask us about them. We are always willing to answer and clarify your doubts so that we can protect Amtex’s integrity and ethics together.

This is why we have created an Ethics Line, which can be accessed to report problems and resolve doubts.

- Call the phone number (574) 444 9991 ext. 4189 or, internally, dial the extension number directly.
- Use the suggestion boxes that can be found in all Amtex’s facilities.
- Send an email to the corporate address [lineaetica.co@amtex-corp.com](mailto:lineaetica.co@amtex-corp.com).

## When should you use the Ethics Line?

- If you observe a behavior that concerns you or that may represent a breach of our Code, the law or the regulations, you should immediately report the problem. By doing so, you will give Amtex the opportunity to treat the problem and solve it, preferably before it becomes a violation of the law or a risk for the health, safety or reputation of the Company.

## How are the reports and/or complaints managed?

- Amtex addresses all the reports about a possible inadequate conduct, act or behavior by confidentially investigating the matter in order to determine if the Code or the law have been breached. After this process, Amtex takes the corresponding corrective measure.

## Our Ethics Line is available to everyone

- There will be no retaliations of any kind against the reporting person. The Company values the help provided by the employees who identify any possible problems we need to solve.
- When you make a report via the Ethics Line, you can choose to remain anonymous and keep the report confidential. However, we encourage all reporting people to provide contact information in order to facilitate the communication for the sake of the corresponding investigation. If you provide your contact information, Amtex will take all the necessary precaution measures to keep your identity confidential while the Company conducts a thorough and fair investigation of the reported matter.
- To help in maintaining the confidentiality, please avoid discussing the matter or any related investigation with other employees.

## If the accusation is false and/or malicious

- The Company will protect all employees who make a report or submit a complaint with honesty. However, knowingly presenting a false accusation, lying to the investigators or denying or refusing to cooperate with an investigation related to the provisions of this Code constitutes a violation of the Code itself.
- Providing or submitting honest information does not necessarily implies that you will be right about the issue when reporting a concern. But you do need to make sure that the information you provide or submit is accurate.





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# **Use and application of the Code of Corporate Conduct**

# Use and application of the Code of Corporate Conduct

In Amtex, we are responsible and consistent with our ethical statements and our Comprehensive Policy. That is why we have developed this Code of Corporate Conduct, which has been designed to ensure the uniformity of behavior of all stakeholders (employees, customers and commercial allies) within the Organization and in their external negotiations, and it also defines the behavioral commitments of the Company.

No series of regulations is capable of including every type of circumstance. Therefore, these procedures may vary according to the needs of complying with the local law or a particular contract.

## Responsibility to comply with and disseminate the Code

The responsibility to manage, disseminate and enforce the Code lies on the Human Resources Direction Department, with the coordination of the Management and the support of the diverse departments required to be involved.

The employees investigated on the grounds of a violation of the Code will have the opportunity to be heard before any final determination is reached, always following the due process in accordance with the Internal Work Rules.

The Company will always try to take disciplinary measures adapted to the nature and the circumstances of the particular violation of the Code, according to the strict compliance with the Internal Work Rules and the due process.

The Sourcing Chain Direction Department will be responsible for the dissemination of the Code among all current and new suppliers, and the Marketing and Sales Management Departments will be in charge of disseminating it among all customers.

Amtex has a Senior Management Committee, which will address the cases related to the external stakeholders.

## Socialization and acceptance of the Code

All new employees must sign a statement of acknowledgment that confirms that they have read the Code of Corporate Conduct and that they accept to comply with all its provisions. All employees will be required to sign similar acknowledgment statements on a recurring basis. Not reading this Code or not signing the acknowledgment statement does not constitute a pretext for an employee to breach any of the provisions of this Code.



## Glossary

**Mission:** It is the fundamental purpose of the Organization. It is focused on the present time and it depends on the activity we carry out, as well as on our context or setting and on the resources we have available.

**Vision:** It refers to a projection that the Organization establishes for the long term regarding how we see our Company in the future, an ideal expectation of what we expect it will occur. The vision is realistic but ambitious, its purpose is to guide and motivate everyone in the Organization to continue with the hard work.

**Comprehensive Policy:** It is a statement of general principles that the Organization commits to fulfill in terms of factors of quality, regulations, human talent, safety, security, innocuousness, environment, communications and social responsibility.

**Social responsibility:** It is a voluntary commitment of the Organization aimed at being consistent with a conscious and sensitive attitude towards the problems of our society. It consists in adopting habits, strategies and processes that help us to minimize the negative impact that we produce on the environment. It also promotes the human development among the people and communities we have an impact on due to our corporate purpose.

**Honesty:** It is a value that carries the commitment to act and operate with full transparency as an Organization, seeking the common good based on guidelines of truth and respect for the rights and property of both people and companies.

**Respect:** This value allows us, as an Organization, to acknowledge the human being, accepting and valuing everyone's qualities, recognizing everyone's integrity, and strictly complying with the rights of both individuals and the society.

**Commitment:** It is the capacity we have as an Organization to fulfill our statements within the established term, assumed with professionalism, responsibility, ethics and loyalty. It also consists in making the greatest efforts to achieve a product with a high standard value of quality that meets and exceeds the expectations of all customers.

**Healthy lifestyle:** It is a state of well-being and balance that evidences the absence of physical, mental and emotional illnesses, as well as the lack of harmful factors due to work-related causes among the employees.

**Innocuousness (safety):** It refers to the existence and control of hazards associated with the products manufactured for human consumption via their ingestion as food or medicine, so that they do not cause health any problems among consumers.

## Glossary

**Secure commerce:** It refers to the standards we abide by as an Organization in order to promote commerce free of unlawful activities, governed by a standardization of procedures in the export and import chains.

**Food security:** It refers to processes developed by means of good manufacturing practices that ensure the quality of the products.