

Anti-Bribery Policy

In Chesterton Mexicana, we have a policy of developing all our businesses and contracts with ethics and integrity, and zero tolerance for public or private bribery and money laundering, so we demand the same commitment and behavior from our employees, business partners, suppliers, and customers.

This policy is applicable to shareholders, employees, business partners, suppliers, and customers of the company. In order to help and promote compliance with this policy, an Ethical Compliance Management System (ECMS) has been established under ISO 37001, which contains measures designed to identify and assess risks; prevent, detect, and deal with bribery; controls and processes that seek to reinforce our culture of honesty and ethics in businesses.

All activities must be carried out in accordance with applicable regulations in each country in which activities are carried out, in addition to maintaining strict compliance with the following rules, codes, legislation and its regulations, which are applicable in Mexico:

- General Law of the National Anticorruption System
- Federal Criminal Code
- General Law of Administrative Responsibilities
- ICC Rules to Combat Corruption
- Code of Ethics and Rules of Conduct for Suppliers, Subcontractors and Business Partners

Chesterton Mexicana, is a company dedicated to the manufacture, distribution and sales of products and services for process industries, we expect our shareholders, employees, business partners, suppliers, customers or any other third party acting on our behalf to carry out their work in a honest way, and that they are committed to comply with the standards of ethical and professional conduct, including this Policy and our Code of Ethics. Violations to our business ethics practices and anti-corruption and money laundering laws could lead to sanctions or even the termination of business relationships.

In order to analyze the activities that could be catalogued as a risk of bribery or money laundering for Chesterton Mexicana, a methodology has been established for the identification and evaluation of bribery risk through the Risk Management Procedure, in which the general and potential bribery risks that could be incurred are identified, in addition to the established controls and their effectiveness.

In addition, such procedure establishes pertinent indicators and periodicity for its compliance evaluations, and alignment with the organizational objectives in anti-bribery matters.

Required revisions and/or updates are subject to an approval process by the company's compliance function and senior management.

To ensure our commitment with compliance and transparency, Chesterton Mexicana will permanently carry out the following actions:

- Training, courses and dissemination of anti-corruption, money laundering and anti-bribery policies.
- Operational, financial, and internal control audits of processes to identify non-compliance with Policies.
- Ethical Complaint System through which complaints and/or reports will be received,

- addressed and resolved.
- Issuance and communication of our ethics code.
 - Third party audits and certification.

Chesterton Mexicana makes available to all shareholders, employees, partners, suppliers and customers a link and a complaints box to report anonymously, confidentially and in good faith concerns or complaints related to bribery, anti-corruption or money laundering. Such reports, concerns or complaints can be made without fear of reprisal. The link and the mailbox will remain available 24 hours a day, 365 days a year through:

- <https://secure.ethicspoint.com/domain/media/es/gui/66624/index.html>
- **Complaint box e-mail: quejas.denuncias@chesterton.com**

Complaints received through the electronic link are managed by a third party, thus ensuring that a possible conflict of interest is minimized and reinforcing the impartiality and confidentiality of the information, this third party will assign a consecutive number that will be provided to the person who reports, along with a password that will allow to check the status of your complaint. All concerns, reports or complaints will be addressed and answered.

Anyone who reports a concern or complaint must act in good faith and have reasonable grounds to believe that the information they provide constitutes a violation of the Codes of Ethics or the Anti-Bribery Policy of Chesterton Mexicana.

No employee of the company, as well as business partners, suppliers and customers who, in good faith, report any violation of codes and policies, will suffer harassment, reprisal or adverse labor consequences. There will be no retaliation for raising your voice or reporting current or potential violations, for cooperating in an investigation, for exercising your legal rights, or for refusing to participate in any activity that you reasonably believe poses a risk of violating the laws or internal regulations of the Company Society.

It is important to mention that the complaint channels must be used responsibly, avoiding to report through this means, issues that could be resolved directly with any area within Chesterton Mexicana, and that has nothing to do with violations of this Policy.

Compliance with this management system is a responsibility of all company personnel, and we must all contribute on achieving the established objectives, committing ourselves to strengthening the effectiveness of our ECMS, sharing suggestions that lead us to its continuous improvement.

To support compliance with the Anti-Bribery Management System, Chesterton Mexicana has delegated to the compliance function (Finance Direction, Total Quality and Human Resources Coordination), who have the authority to supervise and report on the design and implementation of the ECMS, provide advice and guidance to staff on issues related to bribery having independent criteria regarding the Anti-Bribery Management System, Money Laundering, and the Anti-Bribery Policy.

Corrupt practices legislation both in Mexico and abroad, punishes violations with strict penalties and fines, including, in the case of individuals, fines and prison sentences. In addition, Chesterton Mexicana, could be fined, financially sanctioned, temporarily inabiled, subject to domain extinction and even dissolution.


Violations of the Laws, as well as of the Anti-Corruption and Anti-Bribery Policy by Employees and Third Parties, has as a consequence the imposition of disciplinary measures and sanctions, which could include the termination of the employment contract, regardless of the economic sanctions and penalties that by law fall on the person who incurs in these illicit practices. Relationships with Third Parties that fail to comply with this Policy will be terminated in addition to the above.

Sincerely;

CHESTERTON MEXICANA, S.A DE C.V



Ing. Jose Daniel Juarez Robles
Senior Management (General Manager)



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