

CRIMINAL COMPLIANCE POLICY

Massalfassar, April 24th, 2024

The Governing Body of thyssenkrupp Plastic Ibérica, an organization dedicated to commercialization and initial processing of plastics destined for visual communication, construction, and industry, aware of the importance of Business Ethics as a differentiating factor, establishes the following Criminal Compliance Policy that identifies as a responsible company involved in its performance, ensuring the improvement of its Reputation.

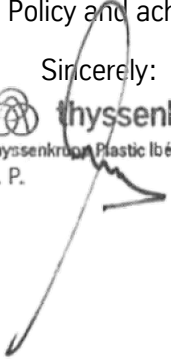
To achieve this purpose, the Governing Body of tkPI declares its commitment and responsibility in the implementation, maintenance and continuous improvement of a criminal offense prevention management system based on the **UNE-19601:2017** standard "Criminal Compliance Management Systems" focused on the adoption and achievement of actions to:

- Promote the increase of the Compliance Culture within tkPI.
- Encourage each person to understand and internalize that they are responsible for preserving the Integrity and good Reputation of tkPI, through strict compliance with the Law with special attention to the applicable criminal legislation and making the correct decisions in each case, expressly prohibiting the commission of crimes.
- Promote the identification, evaluation and monitoring of criminal risks that could occur in our company, in order to prevent or minimize them through appropriate objectives, actions and procedures to comply with the requirements committed by tkPI.
- Establish the obligation for tkPI members to report incidents or indications that represent a risk to compliance with the requirements incurred or against the Criminal Compliance Management System, guaranteeing that the informant will not suffer any type of retaliation.
- Apply a disciplinary regime based on the principles of adequacy and proportionality to punish behavior that is contrary to ethics or professional conduct that tkPI expects from all the professionals that comprise it, or that constitute a breach of the Law or the internal regulations in force in every moment.

The Governing Body appoints and gives authority to the Compliance Body in accordance with the principles of independence, absence of conflict of interest and sufficient resources to guarantee its effectiveness. The Compliance Body is entrusted with the supervision, surveillance, and control of the effective implementation of the Criminal Compliance Management System at the different levels of the organization.

The Governing Body summons and commits all its personnel in the same way, to comply with this Criminal Compliance Policy and achieve the objectives established from it.

Sincerely:



thyssenkrupp
thyssenkrupp Plastic Ibérica, S.L.U.
P. P.

Governing Body