COMPLIANCE POLICY OF MONÓMEROS S.A. AGAINST CORRUPTION AND TRANSNATIONAL BRIBERY.

By virtue of this document, MONÓMEROS COLOMBO VENEZOLANOS S.A. (hereinafter MONÓMEROS) assumes the clear and decided commitment of its managers, employees, and associates to manage, prevent, and mitigate the Risk of Corruption and Transnational Bribery. MONÓMEROS adopts this policy to conduct its business and operations in an ethical, transparent, and honest way, and to be able to identify, detect, prevent, and mitigate the Risks of Corruption or Transnational Bribery. MONÓMEROS is committed to designing, structuring, implementing, executing, and verifying actions aimed at preventing and effectively mitigating any corrupt practice, not only at MONÓMEROS, but also at its subordinate companies, in accordance with the following:

a. Will Evaluate the risks of corruption and transnational bribery, with a risk matrix that identifies and evaluates risk factors such as the economic sector, third parties, contractors, intermediaries, advisors, consultants and type of contract.

b. Will establish adequate and sufficient due diligence procedures for the engagement of suppliers, managers, employees and associates, in order to detect the warning signs identified in terms of Corruption and Transnational Bribery. Based on this, it may decide not to hire or not to continue with a contractual relationship whenever such warning signs are configured.

c. MONÓMEROS appoints a chief compliance officer and an alternate responsible for verifying the implementation of actions aimed at preventing and effectively mitigating any corrupt practice, not only at MONÓMEROS, but also at its subordinate companies.

d. MONÓMEROS has communication channels that guarantee confidentiality, such as the “Ethical Complaints” link, which can be accessed through the Web Page.

e. MONÓMEROS encourages people to make complaints and takes measures to prevent retaliation against employees or third parties who report them.

f. MONÓMEROS will annually disseminate this policy and provide training to its employees, associates, managers, contractors and other interested parties on the prevention, self-control and management of the risk of corruption and transnational bribery.

g. MONÓMEROS will order actions against the Directors and Associates who have management and administrative functions in the event of noncompliance with the Business Ethics and Transparency Program.

APPROVAL

By means of Board of Directors Act No. 462 dated December 29, 2021.

monómeros
Filial de Pequiven
Petroquímica de Venezuela, S.A.