



PTEE COMPLIANCE POLICY

PRODUCTOS ALIMENTICIOS FROZEN EXPRESS SAS (hereinafter FROZEN), as one of the leading companies in customer and consumer loyalty programs, we are committed to maintaining the highest standards of ethics and transparency in all our businesses and operations. To this end, we have adopted a Business Transparency and Ethics Program, which aims to prevent and combat corruption and transnational bribery in all our activities, and to establish a business culture based on integrity and legality, based on the following control policies:

- We are committed to complying with all applicable laws and regulations related to the prevention of corruption and foreign bribery.
- In FROZEN, it is strictly prohibited to offer, promise, authorize, or give any type of bribe, whether directly or indirectly, to any person or entity, including public officials, for the purpose of obtaining or retaining business or any other improper advantage.
- We apply appropriate due diligence procedures prior to engaging with our suppliers, contractors, agents, and any other third parties with whom we do business. We will ensure that these third parties comply with our ethical standards and are committed to preventing corruption and foreign bribery.
- Gifts, entertainment, and hospitality offered or received must be of reasonable value, legal, transparent, and must not influence or be perceived as unduly influencing business decisions. Prior approval from superiors will be required in exceptional cases.
- We will maintain accurate and complete records of all business and financial transactions, including those related to gifts, entertainment, and hospitality. Documentation and accounting will be subject to periodic audits to ensure transparency and compliance.
- We have a confidential and secure system for employees and third parties to report any suspicion of corruption or foreign bribery. No retaliation will be taken against those who report potential violations in good faith.



- We will provide regular training to all our employees on the importance of preventing corruption and foreign bribery. We will foster a culture of ethics and compliance at all levels of the organization.

Failure to comply with this policy may result in disciplinary action, including termination of employment or the termination of contracts with third parties. We will fully cooperate with relevant authorities in the event of investigations related to corruption or foreign bribery.

We are committed to regularly reviewing and updating our compliance policy, which is an integral part of the Transparency and Business Ethics Program, to ensure it always meets the highest standards of business ethics and transparency.