

Anti-bribery Policy

Grupo Empresarial Nuvoil is committed to a Code of Ethics and Conduct based on organizational values which requires us to conduct business with integrity. This commitment involves avoiding any act of bribery while complying with all applicable laws and regulations.

Our commitment is aimed to periodically review the Anti-bribery Management System, maintaining continuous improvement and guaranteeing compliance with the anti-bribery objectives, as follows:

- Maintaining management system effectiveness.
- Maintaining an anti-bribery culture.

This Policy reflects our position of zero tolerance with respect to any act of bribery, it applies to stakeholders and proprietary processes established in Nuvoil's management system.

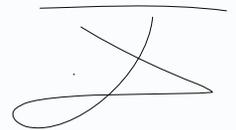
In accordance with the Code of Ethics and Conduct's chapter 8, it is strictly prohibited to any person who, directly or indirectly acts on behalf of our companies, to make or receive any type of improper payment, such as receiving or paying bribes or giving, offering, or promising to deliver money, valuables and travel offerings or hospitality to third parties, including a public official, in order to improperly influence any act or decision of a person or to receive an undue benefit in favor of themselves or the company. Is strictly forbidden to pursue activities derived from commercial relationships that may generate breach of trust, deception, economic losses, and in general, damage to the corporate image and reputation.

Grupo Empresarial Nuvoil ensures that all personnel fully comply with the provisions of this Policy, being conditional for maintaining the employment relation-

ship or association. Any alleged non-compliance will be investigated in accordance with our internal work regulations and through the Ethics Committee and depending on the seriousness of the offense, the sanction may range from issuing a warning to the immediate dismissal of whoever commits it.

Any collaborator or third party who has information regarding the breach of this Policy, the Code of Ethics and Conduct, or related controls, or who considers that is being required to pay or receive a bribe, must report this situation without fear of retaliation, using established mechanisms or sending an email to denuncia@nuvoil.com.

Third party sanctions will correspond to what is established in the regulatory framework of the applicable law.



José Edel Álvarez Delong
CEO
Grupo Empresarial Nuvoil