

IPAC S.A. is a company dedicated to manufacturing and marketing steel products, meeting the needs of domestic and international markets. It has a manufacturing complex located on the Vía a Daule, Km 10.5 in the city of Guayaquil, Ecuador, and has developed own-stores and distributors nationwide. IPAC is committed to the following:

1. To create an anti-bribery culture within the organization, prohibiting any attempt or act of bribery, whether direct or indirect, in money of any currency, favors, or goods.
2. To comply with anti-corruption legislation, including bribery risks, applicable according to the legal framework of Ecuador, as set out in the Organic Criminal Code, as well as other applicable regulations related to the nature of the organization's activities.
3. To set this Anti-Bribery Policy as appropriate for IPAC's purpose and it provides a framework for setting objectives and goals aligned with the Anti-Bribery Management System, which involves periodic reviews for achieving these goals.
4. To comply with the requirements of the Anti-Bribery Management System.
5. To promote the raising of concerns in good faith, or based on a reasonable belief, confidentially and without fear of retaliation, both by people within the organization and third parties with legitimate reasons, in accordance with the Whistleblower Policy.
6. To continuously improve the Anti-Bribery Management System.
7. To appoint a Compliance Officer with autonomy, independence, and resources for the effective implementation and supervision of compliance with the Anti-Bribery Management System and its continuous improvement. The Compliance Officer has direct access to top management and the governing body.
8. To ensure the existence and communication of a disciplinary regime, which will be implemented in the cases provided for and in the event of non-compliance with the Anti-Bribery Management System. Sanctions for non-compliance with the Anti-Bribery Management System are outlined in the Progressive Discipline Policy.

Board of Directors