



AGP Group Compliance Policy

According to the Ethics and Conduct Code of AGP Group

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Please find the latest version of the AGP Group Compliance Policy at www.agpglass.com.*

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What is Compliance?

Compliance means to comply and, consequently, address non-conformities based on adherence to standards, rules and laws. Its goal is to guide and discipline employees' behavior and the behavior of other people connected to the company, like suppliers and customers. Those subject to the policy must follow legal norms, business policies and guidelines, social rules, and AGP's ethical code to avoid, detect and address any deviation or nonconformity that may occur.

Purpose of the AGP Group Compliance Policy

Prevention and reparation are two key components for risk management and business reputation. Prevention strategies reduce chances of non-compliance events, and reparation strategies minimize their impact.

Damage to the company's reputation doesn't always just happen due to external events or misfortunes, as such damage may be a direct consequence of daily management.

Six values are expected in business conduct for decision-making and interpersonal relationships at AGP. They are: humility, innovation, speed, commitment, passion and transparency. From now on, the Compliance Policy of AGP is added to these values and behaviors. It is an instrument to prevent and protect the intangible assets of AGP, based on respect to legal norms, social conduct, and business guidelines in order to avoid bribery and corruption, respect export policies, and protect confidential information.

This policy applies to all employees of AGP, regardless of their position or function in the company, as well as to customers and suppliers, in order to standardize behavior and relations, because managing relationships at AGP is as important as its products and brand all over the world.

In the words of the CEO

The success of longevity has always been based in techniques to preserve viability and profitability of a business, but this doesn't happen if compliance policies are not respected. This happens because compliance ensures that the company is complying with its best legal and social practices. This is a way to achieve our goals ethically and transparently, as well as to investigate, avoid, and solve any deviation, risk or nonconformity. Therefore, I invite everyone directly or indirectly related to AGP to get to know our Compliance Policy and, based on it, we look forward to strengthening effectiveness, productivity, and confidence at AGP based on the ethics, integrity, and protection of confidential information that are intangible assets to our organization.

Many thanks!

Arturo Mannheim CEO of AGP Group

1. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1.1 Objective

The AGP Group ("AGP") desires to maintain a high level of professional and ethical conduct in all countries in which AGP operates. This anti-bribery and anti-corruption policy (the "Policy") describes the methodology to achieve this purpose and also specifies obligations to ensure that the company's activities comply with applicable anti-bribery and anti-corruption laws and regulations.

1.2 Scope

This policy applies to:

(i) All shareholders, managers and employees of AGP;

(ii) Customers and Suppliers of AGP; and

(iii) Third parties (including dispatchers, attorneys, service providers, sales agents and vendors) that may interact directly, and on behalf of AGP, with governmental entities or other third parties.

These persons are called "Parties" in this Policy.

1.3 Applicability

This Policy aims to be an effective prevention of bribery and corruption acts at AGP.

All customers, suppliers or third parties that desire to maintain a relationship with AGP must be evaluated to determine if they have any type of restriction or other limitation in business with AGP due to ethical or legal practices in their performance. This analysis will start with filling a form (Annex I) signed by a legal representative of the party.

1.4 Local Law

This Policy contemplates the standard guidelines of AGP related to this subject. However, in some countries, more restrictive rules, laws, or regulations will supersede this Policy.

1.5 Definitions

Bribery: Bribery means to offer, accept or promise (or authorize to offer, accept or promise) a direct or indirect benefit with the intent to influence or reward a conduct and/or to obtain or preserve a personal or commercial advantage contrary to this Policy.

Corruption: Corruption means using the power entrusted to you to gain an inappropriate advantage from someone else.

Public Administration/Public Agent: This term includes:

- Any administrative agent elected or appointed, government or state department employee, a government agency or a mixed-capital company;
- Any administrative agent elected or nominated or an employee of an international public organization;
- Any person working as a public servant and on behalf of a government, government department or international public organization;
- Politicians and candidates for a political position.

Political Contributions: These are monetary contributions to support political parties, candidates or political initiatives.

Facilitation Payments: These are payments made to a public administrator to speed up the process requested. These payments are intended to influence the time taken by administrative agents (e.g. payments for issuing visas or dispatching of goods quickly), but do not influence in the result.

Gifts: These are benefits of any nature given to someone as a sign of appreciation or friendship, without the expectation of receiving something in return. "Courtesy gifts" are given on culturally recognized occasions (e.g. weddings, funerals) or special times of the year (e.g. Christmas, New Year). Accommodation usually includes drinks, meals and rooms. Entertainment usually includes attending theatre, concerts or sporting events.

Third parties: This is a natural or legal person with whom AGP has a relationship and is not an employee, supplier or customer.

Extortion: To obtain money illegally or to practice illegal activities usually being presented as an Organized Crime.

Joint Venture: This is a type of agreement between AGP and one or more third parties to obtain and operate a business with the purpose of obtaining benefits for all parties involved.

Books/Registers: These are bills, invoices, correspondence, papers, digital files, tapes, memos, and any other information document or transcription of any kind.

ECC: Ethics and Conduct Committee.

CC: Compliance Committee.

1.6 Bribery

Parties cannot bribe or use intermediaries as agents, consultants, advisers, distributors or any other business partner to commit Bribery.

AGP does not differentiate between administrative agents and persons under this Policy or as related to Bribery. Therefore, Bribery will not be tolerated, regardless of the relationship of the Parties.

1.7 Personal Advantage to Employees

Employees should not obtain any profit and/or advantage from functions they perform for the organization, except for their wages or compensation.

1.8 Gifts from third parties and others

No employees of AGP or their family members and/or persons with whom they have a personal relationship are allowed to accept benefits such as gifts, leisure activities, travel, recreational accommodations, specialized training, use of vehicles not authorized by AGP, loans that are not included in agreements signed by AGP, or any other type of benefit that has more value than a simple courtesy, such as a lunch or a calendar, offered by a third party, such as a customer, supplier, competitor, business partner, or company with whom AGP has or may have a relationship. No courtesy item may exceed a value of US\$100.00 (one hundred dollars). If you receive or are offered a prohibited benefit described above, you must contact and advise the ECC for their advice. The ECC will review the matter.

Other privileges, such as discounts offered to AGP employees, can only be accepted if they are available to all employees and are approved by the ECC.

The Human Resources Department and the Sales Department may request support from suppliers to purchase gifts for cultural events of AGP with the approval of the ECC without violating this Policy or compromising a normal and transparent relationship.

1.9 Gifts to third parties and others

Employees shall avoid offering any benefit or gift to customers, suppliers or business partners and can only offer marketing items, entertainment with no economic value, and other benefits provided by AGP to customers, suppliers, and business partners that should be in accordance with the parameters described hereunder:

- Is clearly and exclusively associated with business planning, finalization or implementation;
- Follows a general business practice, has a value within an established budget, and is approved by the Area and Plan General Manager;
- Does not violate applicable laws, regulations or ethical principles;
- Has a maximum value of U\$ 100,00 (one hundred dollars).

1.9 Gifts to third parties and others

Employees shall avoid offering any benefit or gift to customers, suppliers or business partners and can only offer marketing items, entertainment with no economic value, and other benefits provided by AGP to customers, suppliers, and business partners that should be in accordance with the parameters described hereunder:

- Is clearly and exclusively associated with business planning, finalization or implementation;
- Follows a general business practice, has a value within an established budget, and is approved by the Area and Plan General Manager;
- Does not violate applicable laws, regulations or ethical principles;
- Has a maximum value of U\$ 100,00 (one hundred dollars).

You should not offer entertainment to any participant in business meetings or events, unless this entertainment is part of a schedule previously approved by the Executive Board. You should not pay for any type of travel. If you have questions regarding offering gifts, please contact the CC.

1.10 Extortion/Blackmail and Corruption

It is prohibited to request, accept or offer any form of Bribery, blackmail or illegal/unethical profit that benefits employees, other representatives of AGP, partners, government representatives and/or official entities.

Parties must abstain from acts that violate free competition, such as dishonesty, customer confusion, and illegal acquisition of confidential information. Parties also cannot provide or "leak" information that allows competition to obtain a business advantage or is personal information.

1.11 Donations to Political Parties, Political Organizations, Interest Groups and/or Government Entities

AGP does not offer money or contributions to any political party or organization and interest group. AGP also does not compensate or refund employees who make donations or contributions to any party or political organization and interest group. No employee should make any donation or contribution on behalf of AGP or with AGP funds.

1.12 Donations to Nonprofit Institutions and/or Social Institutions

All donations or contributions must be approved by the ECC and should not provide any tangible benefits to AGP. The ECC will verify that the beneficiary works with social objectives not connected to political party or organization and interest group. In return, the beneficiary must offer equivalent certificates or documents to support the donation and, if applicable, a request for tax exemption.

Donation requests should be handled with particular care, especially the ones that may impact AGP sales or generate personal benefits if the request is accepted. For example, donations should not be granted to obtain marketing authorization or any other kind of approval to directly increase sales of AGP products.

1.13 Integrity relation with Third Parties

In AGP's relationship with a third party, these requirements must be observed:

- Existence of a legitimate necessity of products or services provided by the third party;
- Services and products must have a reasonable market price and be approved after three verified quotes;
- The third party should follow standards and applicable due diligence requirements set forth in this policy;
- Existence of a contract or written agreement (e.g.: purchase order), and inclusion of appropriate anti-corruption representations in each such purchase, order, seller/distribution, agreement or other third party agreement.

1.13.1 With Government Entities

AGP disapproves offering or promising benefits as an initiative of employees or third parties to obtain or speed up favorable decisions of government or public entities.

1.13.2 With Customers

Before establishing a business relationship with a customer, the customer will complete Annex I, in addition to any commercial procedures and, if necessary, due diligence must be performed according to the profile analysis.

1.13.3 With Suppliers

Suppliers must comply with all requirements established by the laws of the country in which the business takes place and complete Annex I, in addition to any commercial procedures and, if necessary, due diligence must be performed according to the profile analysis.

1.13.4 With Competitors

Any negotiation with competitors must have the approval of the CC. During any type of contact with a competitor, employees should not discuss any AGP confidential information or internal business, such as list of prices and sales conditions, market overview, organizational processes or other information that would allow competitors to take advantage from AGP.

1.13.5 With Sponsors

AGP will allow sponsorships if approved by the CC and the General Plant Director.

1.14. Facilitating Payments

Facilitating payments are expressly forbidden.

1.15. New Business or Joint Venture

Before closing a deal in a new business or a Joint Venture, a due diligence must be performed.

Please contact the Legal Department for more information.

1.16. Books and Registers/Internal Controls

AGP shall support and maintain books and records that accurately document and reasonably detail the origin and utilization of AGP revenues and assets.

Non-registered, false or misleading accounts in AGP books and manipulation of results are strictly prohibited. All financial transactions must be documented, regularly reviewed and properly accounted in books and records of the respective AGP unit.

All relevant financial controls and approval procedures must be followed. The maintaining and archiving of AGP records must be in accordance with applicable standards and other applicable laws and regulations.

1.17. Implementation

1.17.1 Training

Parties must be familiar with these Policies. They should be trained or be aware of this Policy according to the CC's schedule. AGP local units may determine additional training requirements.

1.17.2 Responsibilities and Implementation

It is the managers' responsibility to implement this Policy. Implementation should be structured through dissemination, experience, incentives, and conduct performance assessments addressing this issue.

1.18. Policy Violation

1.18.1 Potential Deviation Report of Conduct/Non-Retaliation

If the Parties are aware of a potential violation of applicable laws or this Policy, they should report their suspicion immediately to the CC or ECC (compliance@agpglass.com or cecagp@agpglass.com).

A Party who, in good faith, reports a potential misconduct, provides information or helps in other ways in any hearing or investigation of potential misconduct, shall be protected from retaliation of any kind.

1.18.2 Consequences

Violations of this Policy will not be tolerated and may lead to disciplinary and corrective actions and/or termination of employment/service or business relationship.

1.18.3 Exceptions

There will be no exception to the noncompliance of this Policy and each specific case will be analyzed by the CC.

2. SANCTIONS AND EXPORT/IMPORT CONTROL POLICY

2.1. Objective

The purpose of this Sanctions and Export/Import Control Policy (the "Policy") is to ensure that all international AGP negotiations are conducted fairly and in compliance with applicable international trade restrictions, export controls, and anti-boycott regulations, including those of the US Department of the Treasury's Office of Foreign Assets Control, the US Department of Commerce's Bureau of Industry Security, the European Union and the United Nations (UN), among others.

This Policy establishes minimum standards of control for compliance with international restrictions.

2.2. Scope

This Policy applies to:

- (i) All shareholders, managers and employees of AGP;
- (ii) Customers and Suppliers of AGP; and
- (iii) Third parties (including dispatchers, attorneys, service providers, sales agents and vendors) that may interact directly, and on behalf of AGP, with governmental entities or other third parties. These persons are called "Parties" within this Policy.

2.3. Applicability

All customers, suppliers or third parties with whom AGP begins an international relationship must be approved by the CC and the name of each such customer, supplier or third party shall be screened against each of the relevant sanctions lists, including the lists of prohibited (sanctioned) persons and entities maintained by OFAC, Her Majesty's Treasury (UK) and the European Union.

2.4. Definitions

Sanctions: Measures taken by international organizations (e.g. United Nations or European Union) or countries (e.g. United States) that restrict or prohibit trade:

- a. Countries or Regions:** Sanctions that prevent AGP from doing business in certain countries or regions or with certain governments or regimes. The movement of certain products to these countries may also be restricted.
- b. Organizations and Individuals:** Sanctions that apply to international negotiations, organizations and/or individuals.
- c. Products:** Sanctions that restrict export and/or import of certain products, including but not limited to technology and software.

2.5. Restricted Countries

Restrictions and prohibitions of foreign trade regulations in international negotiations in exporting or importing products or services require a specific verification with respect to restricted countries (see Annex III).

2.6. Know Your Business Partner

"Know Your Business Partner" is an expression that describes a basic pattern of due diligence that must be fulfilled while conducting international business.

Applying this process involves a minimum of three steps as defined hereunder:

2.6.1 Registration

In order to create a new business relationship, the negotiation partner must provide at least the following information in Annex I as it is described below:

- Name (legal entity and representative);
- Address and phone number;
- Tax identification number;
- Registration Certificate, including registration number of the company;
- Main business activity;
- Bank details for payment, when applicable.

2.6.2 Red Flag

The following situations require special attention to the registration process and should be reported to the CC if:

- The negotiation partner is a stranger to you or the industry;
- Information about the party is difficult to locate;
- Potential capacities and utilization of the product sold do not match the party's line of business;
- The negotiation partner will pay in cash for expensive items;
- The delivery destination is not related to the negotiating partner or purchasing agent;
- The negotiation partner has little or no business experience;
- The negotiation partner is not familiar with the product performance or features, but still wishes to formalize the purchase;
- A cargo management company is listed as the final destination of the product.

2.6.3 End User Certificate

The negotiation partner that establishes a new relationship with AGP will sign a statement with the due diligence form in Annex I ensuring that the company will not sell, supply, transfer or donate any AGP product to any person located in a restricted or prohibited country or that may be contrary to this Policy, under penalty of termination of the applicable contract and/or the business relationship, without prejudicing any applicable legal rights.

2.7. Policy

Violations

Consequences

Failure to comply with the requirements and restrictions of the policies described herein may expose AGP and those involved to severe consequences, including:

- (i) civil and criminal fines;
- (ii) imprisonment of individuals; and
- (iii) restrictions on the company's ability to perform certain business.

Exceptions

The CC is responsible for the implementation of, and analysis of exceptions to, this Policy and for the due diligence set forth herein.

3. CONFIDENTIALITY POLICY

3.1 Objective

This confidentiality policy (the “Policy”) is intended to guide employees about how they should treat confidential information, as a sender or a receiver. AGP expects everyone to work with confidential information in a sensitive and professional manner. Employees have an obligation not to obtain or attempt to gain access to information to which they do not have proper authorization. However, AGP recognizes the importance of a culture of open communication and accountability. In this way, AGP wants to preserve personal and organizational security.

3.2 Scope

This Policy is directed to all parties who have access to confidential information of AGP including, but not limited to, direct and indirect employees, service providers, customers, suppliers and business partners.

3.3 Policy Elements

Confidential Information means any information related to Company's business and finances, including, but not limited to, technical procedures and intellectual property rights, AGP's clients and suppliers lists with details of potential customers; negotiations, transactions and businesses; products and services; contact details of customers and suppliers; information about individuals and employees; financial projections, goals and accounts; price policies and price statistics; business activities, product development, future plans and any other information indicated by AGP to be considered confidential information.

3.4 What Employees Should Not Do:

- Use confidential information to obtain personal advantage;
- Disclose confidential information to anyone outside AGP without proper authorization;
- Send documents and files using unsafe or unauthorized applications.

3.5 What Employees Should Do:

- Lock and secure all confidential information at all times;
- Ensure that confidential information is only transferred through secure and authorized devices;
- Disclose information only when it is necessary and authorized;
- Keep confidential documents and information inside company's premises, and possession, except with specific and proper authorization;
- Return confidential files and delete them from personal devices, when the files are no longer required or the employee ceases employment with AGP;
- Sign non-competition and/or non-disclosure agreements;
- Request authorization from authorized management to have access to certain confidential information;
- Mark confidential information and all emails using the following:
“The information in this document is for exclusive use of authorized personnel by AGP and contains information classified as AGP confidential property. To use, review, copy, distribute, transmit, retransmit, etc. by any type of media to different people is not authorized and forbidden. Everyone that misuses this information may lead to criminal actions and liability for civil actions.”
- If you are not the intended recipient of this email, please inform the sender immediately.” Copyright (2018) - AGP America s.a. - Proprietary and Confidential Information disclosed under NDA
- When sending emails, always use the authorized signature provided by the Marketing Department and in the subject, if appropriate, write “Confidential” when sending confidential information.

3.6 Policy

Violations

Consequences

Employees that violate the Policy will face legal or other actions that may include civil or criminal proceedings, labor disciplinary action, and/or termination by AGP.

AGP will investigate all violations and may also punish any unintentional violation, depending on the circumstances and seriousness.

Exceptions

Confidential information may occasionally be disclosed for legitimate business reasons. For example:

- If a regulatory agent requests an investigation or audit.
- If AGP verifies an enterprise or partnership that requires disclosure of some information (within legal limits).

In such cases, Employees involved must request formal permission from authorized AGP management, obtain such approval, and document the disclosure procedure authorized by management.

3.7 Duration of Confidentiality

The employee is committed to this Policy even after termination of employment or termination of a business relationship.

3.8 Questions

If you have any questions, please contact the CC or local legal department.



AGP GROUP COMPLIANCE POLICY ANNEX I

THE AGP GROUP MANAGEMENT SYSTEM COMPLIANCE IDENTIFICATION FORM

To add your company to The AGP Group Management System, please share the following details: Classification: Supplier Customer Third-Party

GENERAL INFORMATION

Legal Name of the company:

Nationality: National Registration Number:

Economy Activity:

Bank Details:

Address:

City: Country: Postal Code:

Contact Name: Email: Phone Number:

SUBSIDIARIES

If there is a subsidiary of the company, please list the name(s), complete address, national registration / tax number:

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The establishment of a commercial or business relationship with any company of the AGP Group depends upon the reading and acceptance of AGP's Compliance Policy. A download of The AGP Group Compliance Policy is located on the website at <http://agpglass.com/downloads> under the compliance section. If there is an issue with obtaining the policy on the website, please request a copy by sending an email to compliance@agpglass.com. By confirming this statement as the named legal representative, you warrant that you have read, understood and agree to AGP's Compliance Policy. You agree and declare that you have the authority to give consent to allow the AGP Group, at their discretion, to conduct inquiries of your name, the names and company listed on this document. This data will include but may not be limited to the collection of personal information of individuals listed or not, identification documentation, additional information to substantiate the details, emails, phone numbers and the use of normal business communications obtained by the AGP Group for the sole purpose of validating the data provided.

I confirm the above statement.

By confirming this statement, as the legal representative of the company, you are warranting that the named company by either having contact with and / or purchasing products from any company of the AGP Group, any information learned shall not be shared or product that has or will be purchased, given to, transferred, shipped or donated to any person, company, entity or government agency located in a country which is restricted or forbidden to possess such information or possess the type of products manufactured by the AGP Group or is ultimately determined by The AGP Group to be contrary to the AGP Group Compliance Policy. Violation, either by commission or omission, will result in the termination of contract and/or commercial relationship the AGP Group without prejudice to the applicable legal measures. To make certain of compliance, the AGP Group Compliance Policy should be consulted at our website at <http://agpglass.com/downloads> under the compliance policy section. If there is an issue with obtaining the policy on the website, please request a copy by sending an email to compliance@agpglass.com and one will be forwarded.

I confirm the above statement.



AGP GROUP COMPLIANCE POLICY ANNEX I

The information provided in this form is true, under penalty of the applicable legal measures.

Legal Representative Signature

Legal Representative Signature

Print Name:

Print Name:

Location Signed and Date Signed

Location Signed and Date Signed

Please provide one of the following documents that contains a legal name and address of your organization: business license, tax registration certificate or national registration certificate.

AGP GROUP COMPLIANCE POLICY ANNEX II

THE AGP GROUP MANAGEMENT SYSTEM COMPLIANCE IDENTIFICATION FORM

To add your company to The AGP Group Management System, please share the following details: Classification: Supplier Customer Third-Party

GENERAL INFORMATION

Legal Name of the company: _____

Nationality: _____ National Registration Number: _____

Economy Activity: _____

Bank Details: _____

Address: _____

City: _____ Country: _____ Postal Code: _____

Contact Name: _____ Email: _____ Phone Number: _____

SUBSIDIARIES

If there is a subsidiary of the company, please list the name(s), complete address, national registration / tax number:

LEGAL REPRESENTATIVES

1) Name: _____

National ID Number: _____

Nationality: _____

Is this individual considered a Politically Exposed Person (PEP): Yes No

2) Name: _____

National ID Number: _____

Nationality: _____

Is this individual considered a Politically Exposed Person (PEP): Yes No

3) Name: _____

National ID Number: _____

Nationality: _____

Is this individual considered a Politically Exposed Person (PEP): Yes No

4) Name: _____

National ID Number: _____

Nationality: _____

Is this individual considered a Politically Exposed Person (PEP): Yes No

Does the company or its representatives have any interaction with governmental entities?

YES

NO

If yes, please describe:

The establishment of a commercial or business relationship with any company of the AGP Group depends upon the reading and acceptance of AGP's Compliance Policy. A download of The AGP Group Compliance Policy is located on the website at <http://agpglass.com/downloads> under the compliance section. If there is an issue with obtaining the policy on the website, please request a copy by sending an email to compliance@agpglass.com. By confirming this statement as the named legal representative, you warrant that you have read, understood and agree to AGP's Compliance Policy. You agree and declare that you have the authority to give consent to allow the AGP Group, at their discretion, to conduct inquiries of your name, the names and company listed on this document. This data will include but may not be limited to the collection of personal information of individuals listed or not, identification documentation, additional information to substantiate the details, emails, phone numbers and the use of normal business communications obtained by the AGP Group for the sole purpose of validating the data provided.

() I confirm the above statement.

By confirming this statement, as the legal representative of the company, you are warranting that the named company by either having contact with and / or purchasing products from any company of the AGP Group , any information learned shall not be shared or product that has or will be purchased, given to, transferred, shipped or donated to any person, company, entity or government agency located in a country which is restricted or forbidden to possess such information or possess the type of products manufactured by the AGP Group or is ultimately determined by The AGP Group to be contrary to the AGP Group Compliance Policy. Violation, either by commission or omission, will result in the termination of contract and/or commercial relationship the AGP Group without prejudice to the applicable legal measures. To make certain of compliance, the AGP Group Compliance Policy should be consulted at our website at <http://agpglass.com/downloads> under the compliance policy section. If there is an issue with obtaining the policy on the website, please request a copy by sending an email to compliance@agpglass.com and one will be forwarded.

() I confirm the above statement.

The information provided in this form is true, under penalty of the applicable legal measures.

Local and date

Legal Representative Signature

Legal Representative Signature

Print Name:

Print Name:

Please provide one of the following documents that contains a legal name and address of your organization: business license, tax registration certificate or national registration certificate.

COMPLIANCE POLICY OF AGP GROUP

ANNEX III EMBARGOED COUNTRIES

Restriction Conditions

All employees involved in international negotiations have an obligation to comply with the Compliance Policy and should immediately contact the CC if they are aware of a negotiation that may contradict it.

AGP prohibits any negotiation with companies, entities or residents located or organized under the following conditions:

- a) Any person who is subject or target of restrictions administered by the Office of Foreign Assets Control (OFAC) including the list called Specially Designated Nationals and Blocked Person List, as defined at <http://www.ustreas.gov/offices/enforcement/ofac/sdn/>, by United Nations (UN), European Union (EU), Her Majesty's Treasury (UK HMT), Swiss State Secretariat for Economic Affairs (SECO), Hong Kong Monetary Authority (HKMA) and Monetary Authority of Singapore (MAS) that together are denominated "Restriction Programs";
- b) Any person belonging completely, partially or controlled by another object or subject of restrictions imposed by the Restriction Programs;
- c) Any person domiciled, resident or located in Iran, Sudan, Syria, Cuba, North Korea or Crimea, hereinafter denominated "Sanctioned Jurisdictions";
- d) Any other person with whom the United States (USA) cannot be involved due to a National or International Law.

Restricted Parts and Countries

The following countries are considered restricted countries:

- Afghanistan
- Armenia
- Azerbaijan
- Belarus
- Burundi
- Central African Republic of Myanmar (Burma)
- Democratic Republic of Congo
- Egypt
- Eritrea
- Guinea
- Guinea Bissau
- Ivory Coast
- Iraq
- Lebanon
- Liberia
- Libya
- Myanmar
- Moldavia
- Russia
- Somalia
- Tunisia
- Ukraine
- Venezuela
- Yemen
- Zimbabwe

The conduct of business with persons located in these countries should be preceded by a strong due diligence process that commences with completing Annex II, considering restrictions in these localities to individuals or entities defined as "Restricted Parties" or Specially Designated Nationals - SDNs. In other words, although we may conduct business in a restricted country, we cannot do it with a restricted party or SDNs.

Restricted Parties or SDNs involve the following categories: individuals or entities associated with restrictive governments or governments which weaken democracy, associated with terrorists, drug dealers, people involved in proliferation of weapons of mass destruction, international criminal organizations, and international sanctions evaders.