



CODE OF ETHICS AND COMPANY BEHAVIOUR

CONTENTS

Letter from the Management Team	3
Mission, vision, values and principles	4
Our Code of Ethics	6
Application of the Code of Ethics	7
Terms	8
Our people	9
Human rights	10
Fair work and non-discriminatory practices.....	10
Child and forced labor	10
Non-discrimination	11
Freedom of association	11
Workplace harassment	11
Harassment, Sexual Misconduct and Sexual Harassment.....	12
Workplace health and safety.....	12
Consumption, use or sale of alcohol, drugs and controlled substances	13
Our business resources	14
Conflicts of interest	14
Records and disclosing information	16
IT and communications systems and Information security	16
Confidentiality of information and data privacy	19
Intellectual property	20
Intellectual property developed by collaborators or third parties.....	20
Privileged information	20
Transactions with related parties.....	20

Our commercial relationships and with the authorities	22
Fair competition	22
Trade controls.....	23
Purchasing goods and services	23
Anticorruption.....	24
Gifts	24
Donations and political involvement	24
Anti-money laundering	25
Business decision-making.....	26
Compliance with tax obligations	26
Community and society	26
The environment and sustainable development	26
Media relations.....	27
Violations and sanctions	28
Reporting Line	29
Contacts and means of reporting	31
Reviews.....	33
Ethics and Discipline Committee.....	34
Culture of Compliance	35
Compliance Committee	36
Questions	37

Letter from the Management Team

In Grupo México we have a permanent commitment with our people, the environment, the communities with which we interact, our Interested Parties and of course with the achievement of our goals. This commitment is based in an organizational and labor culture based on values of honesty, responsibility and respect, the effective communication and teamwork.

As part of this commitment, Grupo México has set up its Code of Ethics, whereby we reaffirm our values and pose our Mission and Vision. The main principles and conducts are herein reflected to work in harmony with our collaborators, shareholders, internal and external suppliers, clients, authorities and our communities, with full respect to human rights, pursuant to the terms set forth in our Human Rights Policy.

It is important that all of us, who are part of Grupo México, be consistent with these values, complying with the policies and procedures set forth for this purpose.

We invite you to review and comply with this Code of Ethics and integrate it to our daily activities, our decisions and general conduct, so that we can guarantee to achieve our personal, corporate, environmental, social and governance goals.

Mission, vision, values and principles

Mission

To meet the needs of our markets through large scale and long-term projects, staying on the cutting-edge in technology, and always committed to our people, the environment, our values, the community and our social responsibility, maximizing the generation of value for our investors.

Vision

To be a world leader in efficiency and profitability in our areas of business, prioritizing people and their overall development, and guaranteeing the sustainability of our operations.

Values

- Honesty, acting with integrity, personal and professional ethics, and a commitment to ongoing improvement.
- Respect, for all people, laws and the environment.
- Responsibility, meeting our commitments with results.

Principles

Aware of the challenges that exist not only within our organization, but also in society and in terms of sustainability, Grupo México has adopted the 10 universal principles established in the *United Nations Global Compact*¹. These principles are related to human rights, labor, the environment and the fight against corruption, and we incorporate them into our strategies and our day-to-day operations.

¹ <https://www.un.org/es/cr%C3%B3nica-onu/el-pacto-mundial-de-la-onu-la-b%C3%BAsqueda-de-soluciones-pararetos-globales>

Grupo México contributes to these principles in the following ways:

Human rights

Principle 1: Supporting and respecting the protection of internationally recognized human rights, within the Company's sphere of influence.

Principle 2: Ensuring we are not complicit in human rights abuses.

Labor

Principle 3: Supporting the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Supporting the elimination of, and having zero tolerance for, human trafficking and all forms of forced and compulsory labor.

Principle 5: Supporting the effective abolition of child labor.

Principle 6: Supporting the elimination of discriminatory practices in hiring and the workplace.

Environment

Principle 7: Taking a preventive approach in favor of the environment.

Principle 8: Undertaking initiatives to promote greater environmental responsibility.

Principle 9: Encouraging the development and sharing of environmentally friendly technologies.

Anti-corruption

Principle 10: Fighting against corruption in all its forms.

Our Code of Ethics

The **Grupo México Code of Ethics** is an introductory, and by no means exhaustive, tool to guide our conduct in terms of our legal, professional and ethical obligations, both in our business dealings and our interpersonal relationships. Therefore, this document is intended to serve as an aid in understanding the expected conduct and meeting compliance with the Code of Ethics and other related Grupo México Policies and Procedures.

It is not possible to discuss here every type of situation, therefore good personal judgment must be relied upon to sustain the building of our culture of integrity.

Acting in accordance with our Code of Ethics will promote positive results in our individual and collective work at Grupo México and with our stakeholders, fostering an environment of commitment and mutual trust. The ability of Grupo México to create value is based on upholding high standards of respect and professional ethics in our business relationships with the community, shareholders, the authorities, our collaborators, customers and suppliers. It is therefore our responsibility and commitment to comply with the Code of Ethics, as this is the only means by which we will reach our goals and objectives in an environment of transparency, as well as compliance with all laws and regulations applicable to our operations.

Application of the Code of Ethics

Observance of this Code of Ethics is mandatory for all persons collaborating directly or indirectly with the Company, including the Board of Directors, senior management, all personnel, representatives, and any person acting on behalf and in representation of Grupo México and our subsidiaries in Mexico and overseas.

Observance of this Code is also mandatory for our suppliers and contractors as part of the selection criteria and contracting of persons who provide us goods and services.

We share this Code with all members of our value chain and our stakeholders in general, to inform our community of our principles and also the manner in which we conduct our relationships.

Terms

Care has been taken to use gender inclusive language in this Code of Ethics. Also, as applicable, terms used in the singular shall be understood to refer to the plural and vice versa.

Our people

Our most important asset is our people and we care for the wellbeing, growth and development of our personnel, encouraging training and ongoing refresher training, supporting the efficient performance of their tasks in a positive work environment.

Human rights

Grupo México promotes and protects human rights in accordance with the *United Nations Universal Declaration of Human Rights*².

In this context, we include the rights of indigenous peoples and communities, through understanding and respecting traditions and customs, and the spaces where we may conduct activities, operating always as prescribed by law.

We also adhere to the principles of the International *Labor Organization's Declaration on Fundamental Principles and Rights at Work*³.

Fair work and non-discriminatory practices

Grupo México promotes equal opportunity, treatment and conditions for all our personnel and provides an environment where fair work practices permeate the whole organization. Company employees have access to social security, receive a fair salary and ongoing training to increase productivity and for their own development and overall wellbeing, with shared benefits, and we ensure optimal conditions in terms of health and safety to prevent work-related risks.

Child and forced labor

Grupo México reiterates our commitment to the human and labor rights recognized in local and international legislation and the United Nations Global Compact⁴, upholding international standards for the protection of the fundamental rights and freedoms of the people involved in Company activities. We therefore state our total rejection of child labor (minors under the minimum legal working age) and all forms of forced, compulsory or coerced labor.

² <https://www.un.org/es/about-us/universal-declaration-of-human-rights>

³ <https://www.ilo.org/declaration/lang-es/index.htm>

⁴ <https://www.pactomundial.org/wp-content/uploads/2015/04/ppios-laborales-del-PactoMundial-guia-paraempresas.pdf>

Non-discrimination

The respect, inclusivity and diversity of our people are essential to maintaining a positive and peaceful work environment, and also to retaining highly qualified people committed to the Company.

We fully respect the human dignity of our collaborators and reject any form of discrimination, whether it be direct or indirect, based on gender identity, age, race, religion, sexual preference, thought, education, social status, culture, working style, talent, individual quality or special needs, such as illness, disability, accident or family situation.

Freedom of association

In compliance with applicable laws and regulations, Grupo México respects its employees' rights of association, as well as the freedom to join a trade union and to participate in union activities.

Workplace harassment

Any conduct or activity that is intended to or would humiliate, offend or intimidate another person is prohibited.

Workplace harassment includes, among other behaviors, making inappropriate comments or jokes, insults or threats that may or may not be based on a person's physical characteristics or disability, their gender, beliefs, race, age, nationality or other condition, whether verbal or through emails, voice mails or any other written or graphic means.

Workplace harassment must be reported and investigated, applying sanctions as merited and decided by the Ethics Committee on a case-by-case basis.

Grupo México also prohibits any practice that would threaten the dignity or wellbeing of our collaborators, suppliers, contractors or any person who has any dealings with the Company and its subsidiaries.

Harassment, Sexual Misconduct and Sexual Harassment

Sexual harassment is prohibited and is defined as any unwelcome behavior or action, by any means or form, with implications or inferences of a sexual nature.

Sexual harassment includes, among others, lewd glances, gestures, suggestive facial expressions, words, phone calls, images, text messages, emails, personal letters or messages, invitations or any other action that would insinuate or contain proposals of a sexual nature, such as touching, cornering or holding the person being harassed, psychological pressure, threats, and in general, any action or conduct of a sexual nature that could be considered hostile, intimidating or offensive.

Sexual harassment must be reported both internally and to the corresponding authorities, investigated and, as warranted, sanctioned as determined by the Ethics Committee on a case-by-case basis, independent of any legal action the authorities may take.

Sexual conduct of any kind on company property is prohibited, even if it is consensual.

Grupo México also prohibits any practice that would be detrimental to the dignity and integrity of Company employees, suppliers, contractors or any person with whom the Company has dealings.

Workplace health and safety

At Grupo México, the safety of our people comes first, as our team is our most valued asset. Caring for the life, health and physical wellbeing of our personnel is essential and a top priority in all our activities. Therefore, in addition to fostering a culture of health and safety among our collaborators and in a spirit of co-responsibility, we are all committed to ensuring compliance is met with all applicable health and safety laws and regulations, as well as our Company rules and policies.

We have a comprehensive system in place to ensure occupational health and safety, and also manuals that outline our procedures to preserve the physical wellbeing of our people while they are at work, driving a culture of high priority that goes beyond that required by law and establishing the following principles:

- Health and safety are everyone's responsibility.
- All workplaces must be safe.
- All Grupo México employees, outside people and visitors must adhere to the Company's health and safety codes, rules and procedures.

- We must all be aware of the health and safety conditions, and identify, prevent and minimize potential health and safety risks as an essential part of our activities, preventing and avoiding accidents and illnesses, promoting safety actions.
- All personnel must be properly trained before being assigned a task to ensure the work is performed safely.
- All personnel must be given the proper equipment and materials to be able to perform their tasks safely.
- Ensure that no goal would justify violating the safety codes and procedures, putting the physical wellbeing of any Grupo México employee or any other person at risk; any situation that would appear to present a threat to any person or property must be reported immediately.
- We must all contribute to the ongoing improvement of our health and safety management systems and to achieving the objectives of our health and safety programs, including our overarching goal of zero accidents.

We require the full commitment of our collaborators, contractors and any other outside person involved in Grupo México activities, working only with persons who observe in full our safety codes and standards, and also taking responsibility for keeping our workplaces clean and safe.

Consumption, use or sale of alcohol, drugs and controlled substances

Grupo México offices and sites are substance-free environments. The consumption, use or sale of alcohol, drugs and controlled substances and, in certain instances, medications without the proper prescription that could affect behavior or workplace health and safety, is prohibited, applicable to both in-house and outside personnel.

Grupo México will issue advance notice of occasions when the consumption of alcohol is permitted for a specific event or celebration (such as the end-of-year toast).

Our business resources

As collaborators, we all depend on the responsible use of the resources that Grupo México provides to us to do our work and perform our respective tasks and duties properly.

All Grupo México resources (including work tools, travel and expenses) are to be used efficiently for Company-related business and activities. The use of Grupo México resources for personal or any other purpose not directly associated with our work or the performance of our tasks is prohibited.

We are all responsible for protecting Grupo México assets against loss, damage, improper use, abuse or theft, and for maintaining a strict control of costs and expenses and that these resources be managed efficiently.

In accordance with applicable legislation, Grupo México reserves the right to supervise and inspect how employees use Company assets, including inspecting all email, data and files on personal computers and other devices connected to the network.

Conflicts of interest

A person incurs in a conflict of interest when instead of acting impartially, they guide their decisions or actions for their own gain or benefit or for the benefit of another, often for financial or personal reasons.

Grupo México defines a conflict of interest as any situation where a person's actions are no longer objective and impartial, to the detriment of the name or property of Grupo México and/or its subsidiaries, placing their own interests above those of the Company.

Conflicts of interest involving a personal or professional relationship, real or apparent, must be reported and handled with transparency.

Following are some examples of actions that could involve a conflict of interest (noting this is not intended to be an exhaustive list):

- Holding interest in or employment at a competitor of Grupo México while holding interest in or employment at Grupo México.
- Competing, directly or indirectly, with Grupo México for a business opportunity.
- Doing business with another company, organization or individual on behalf or in representation of Grupo México, based solely on a personal relationship.
- Accepting or offering gifts that would go beyond common business courtesies. Grupo México and/or its subsidiaries will issue a Policy on hospitality, gifts and courtesies to describe in detail the expected conduct in this regard.
- Participating, directly or indirectly, in any activity that could improve the position of a competitor against Grupo México.
- Holding interest in any company that does business with Grupo México.

Company employees are prohibited from the following, regardless of the form of remuneration:

- Contracting or transferring to the same area of Grupo México, persons who are blood relatives to the fourth degree or related by marriage to the third degree, without the authorization of Human Resources and/or the corresponding audit committee⁵, and in no circumstance if
 - They would have authority over the other person.
 - There would be a conflict of interest or risk, real or potential.
 - This type of conflict of interest must be prevented throughout an employee's professional career with Grupo México.
- Engaging in operations for personal gain or for the benefit of family members or third parties, to the detriment of Grupo México.
- Participating in matters involving Grupo México, where the employee holds a personal, family or business interest or stands to gain a benefit, referring to third parties with which the employee has professional or business dealings, or for partners or

⁵ Definition pending

companies in which the employee or their family members hold or have held interest in the last 2 (two) years.

All Grupo México collaborators are required to complete a Disclosure of Operations with Related Parties and Conflicts of Interest form truthfully and honestly declaring any conflict of interest they may hold. These Disclosure forms are to be sent to the Compliance department for the Division and to the Internal Audit department, for review.

Records and disclosing information

It is important for Grupo México to ensure that all information be complete, accurate, transparent and reflective of the Company's business and strategy, and also to maintain accurate records of all transactions and performance indicators.

We must ensure that our financial statements, regulatory reports and public documents are accurate, complete, timely and that they meet all applicable requirements, in terms of financial reporting standards, legal requirements and company rules and procedures on disclosure. Therefore, we are all responsible for generating and maintaining correct and accurate information, with a high degree of integrity, communicating this appropriately both internally and externally.

Company and outside personnel who have access to or who conduct activities related to generating financial or privileged information are prohibited from using this information to gain advantage, for personal use, or to obtain personal benefit or for family members or third parties.

All Company personnel are required to familiarize themselves with the obligations and time periods set in our rules and regulations regarding securing and preserving information and, at the appropriate time, destroying information properly. Grupo México and/or its subsidiaries will issue a detailed policy on holding and safeguarding information.

IT and communications systems and Information security

We all have access to certain communications and IT systems provided by or related to Grupo México, including software, hardware, network systems and other message delivery systems to do our work and perform our tasks. It is our responsibility to use

these IT resources solely for the purposes authorized and for the exclusive interest of Grupo México, preventing any improper use.

Some examples of improper use of IT systems include:

- Using, selling or copying licensed software without authorization.
- Accessing, downloading, sharing or storing material that may be offensive, discriminatory, sexually implicit or explicit, violent, obscene, or which could be interpreted as a form of harassment or sexual abuse.
- Intentionally introducing a virus or installing software that could put the Company's security at risk.
- Engaging in any illegal activity.
- Downloading, sharing or storing pornographic materials in any form (photos, videos, images, etc.).
- Using Company IT resources for profit.
- Negotiating or speculating with Grupo México products or services.
- Making any type of statement on any IT communication media, social network, commercial publication, or any other media in the name of Grupo México, without the proper authorization from the corresponding area.
- No person is authorized is authorized to create backups of personal information on computers or devices property of Grupo México.
- Accessing or using social networks as a means of communication with or between Company employees and/or third parties for matters involving Grupo México.
- Using mobile devices to the detriment of Grupo México, to collect, copy or share documents, data, processes and/or any type of information property of Grupo México or third parties related to the Company.

Consult the Information Security Policies of Grupo México and/or its subsidiaries for more information about the expected conduct in this regard.

Electronic messaging systems are a fundamental tool for communications between Company employees and the use of these systems is reserved to Grupo México. Therefore, these systems must only be used for the tasks and duties associated with each position or charge. Some examples of unacceptable use are:

- Conducting private or personal business.
- Forwarding email or message chains.
- Causing any type of electronic damage.
- Selling items.
- Accessing websites that are not related to Company operations or business, with the exception of those that are necessary to pay for services or activities involving employee transportation and work time, applying criteria of common sense.
- Capturing or disseminating obscene, pornographic or defamatory material, or any other type of offensive material.
- Engaging in flaming or spamming. Flaming is sending offensive or ill-intentioned messages by email. Spamming is a marketing scheme used to saturate thousands of users with unsolicited messages.
- Installing unauthorized software (games, chat, freeware).

As email messages are sent over communications networks, which by their nature are not secure, email should not be considered a secure medium for sending confidential information. Collaborators are advised to consult the IT department about sharing confidential information.

Everyone at Grupo México who uses any electronic messaging system in connection with their duties and operations must not share any confidential information via these systems to prevent unauthorized access, infiltration, falsification, loss or destruction of information. We must also refrain from using social networks to share Grupo México confidential information or for offering opinions or disclosing information on behalf of the Company.

It is our responsibility as users to determine whether information sent or received by email is confidential and whether it comes from an official and reliable source, before using this information for purposes related to Grupo México.

Company and outside personnel requiring access to the Grupo México infrastructure for email and internet use must strictly adhere to the corresponding policies.

It is extremely important that all information owned and safeguarded by Grupo México be safe and protected at all times. Therefore, it is our responsibility to not access unsafe

or suspicious websites in order to prevent any type of attack on Grupo México's servers that could put Company information at risk.

All employees must also participate in the training provided on information security and the correct storage and use of information.

Sharing usernames/passwords, accounts or authentication devices is not permitted, as this would expose the authorized user to responsibility for actions taken by another person using their credentials.

Confidentiality of information and data privacy

We hold information confidential, including that of Company personnel, customers, suppliers and, in general, all the parties involved in our operations, except when the disclosure is authorized for legitimate purposes or by order of the authorities.

Grupo México confidential information includes inventions, creations, practical know-how, trade secrets, financial information and all related information associated with our operations. Therefore, confidential information must be used only for the purposes permitted by Grupo México and for the conducting of our activities.

We protect the data privacy of our shareholders, personnel, suppliers, customers, applicants and candidates, and also their personal data or any other shared with Grupo México and our employees, observing the controls established to prevent any unauthorized or illegal use and the destruction or loss of this information.

Aware of the needs of suppliers, customers and interested third parties, Grupo México complies with the data protection laws and regulations in the places where we operate. Therefore, we ensure personal data will not be used for any other purpose than for which it was collected, as stipulated by applicable regulations. Grupo México and/or its subsidiaries have Policies on Data Privacy that detail the expected conduct in this regard.

Intellectual property

Grupo México considers intellectual property to be a high-value asset. Intellectual property includes, without limitation, software licenses, patents, designs, processes and procedures, copyrights, trademarks, industrial secrets and industrial designs.

We must take all necessary precautions and treat Grupo México intellectual property with the same care and protection as for other assets, ensuring all intellectual property is registered with the corresponding authorities, and refraining from sharing, disclosing or losing information related to Grupo México intellectual property during and after our employment or contract with the Company.

Intellectual property developed by collaborators or third parties

All information and documentation resulting from the activities and services rendered by any employee, supplier or service provider, or developed and/or conceived during their employment or contract with the Company, will be considered property of Grupo México. Therefore, we will secure the rights that Grupo México holds on such information and documentation, complying with applicable regulations on employee inventions.

Privileged information

It is not unusual that, in the performance of our tasks within Grupo México, we will have access or knowledge of privileged information, which is defined as internal information that has not yet been shared with the public. In these cases, it is strictly prohibited to use this information for any direct or indirect personal gain or for any family member or third party. Specifically, it is prohibited to use or disclose privileged information to third parties who could take advantage of such information to buy or sell securities.

This applies not only to non-public Grupo México information, but also to information associated with other companies to which we have access during the course of our work.

Transactions with related parties

We strive to ensure that transactions with related parties are conducted according to market conditions and with transparency for Grupo México.

Transactions with related parties are transactions that Grupo México operates with a person or entity meeting any of the following conditions:

- A person that controls or has significant influence in an entity that is part of Grupo México.
- A person that holds decision-making authority in an entity that is part of Grupo México.

- The spouse, partner, and blood relatives to the fourth degree or related by marriage to the third degree, of persons who control or who have decision-making authority or significant influence in an entity that is part of Grupo México.

Transactions with related parties must be operated according to Company policy and approved by the Compliance Office and Internal Control. These transactions and disclosures will be reported in the Grupo México financials in compliance with current and applicable local and international laws.

Our commercial relationships and with the authorities

Clear understanding of the principles and values outlined in this Code of Ethics must be reflected in all relationships between Company employees, agents and representatives with our commercial partners and public officials, to foster ethical and sustainable value chains based on open competition and a strict anticorruption policy.

Additionally, we must maintain an attitude of respect and collaboration with all authorities.

Any offering, favor, compensation or attention given to public officials or government employees that could be tied to obtaining, or perceived by others as intending to obtain, personal benefit or for Grupo México is prohibited.

Fair competition

We must comply with all antitrust laws intended to promote open and fair competition in each of the countries where we operate. Although these laws vary from country to country, they generally prohibit practices that would jeopardize market competition, such as price fixing, tender manipulation, and market, client or territorial division or assignment, and any other monopolistic action.

We compete ethically and fairly within the framework of antitrust laws and fair competition practices, and therefore have developed general rules of conduct aimed at preventing risks in situations where we meet or have contact with the competition. In these cases, we must:

- Not deviate from the matters as stated on the formal agenda or the declared purpose for the meeting.
- Consider that our mere presence during a conversation between third parties

where prohibited matters are discussed can lead to serious consequences, for both ourselves and for Grupo México.

- Maintain proper lines of communication with customers or suppliers who are also competitors and not give preferential treatment for the personal gain of anyone.
- Avoid formal or informal conversations with competitors involving: (i) prices charged or paid or price setting, elevation or manipulation; (ii) any obligation to not produce, process, distribute, sell or acquire more than a limited quantity of goods; (iii) the division or assignment of markets, or (iv) coordinating positions on tenders or RFPs. This includes any communication or comment with any competitor that could be interpreted as a criticism or approval of any Company policy on pricing. Also, care must be taken when discussing any of these matters with customers, the media or others outside of Grupo México.

Questions should be directed to the Legal department and/or the Compliance Office; remembering to act always with common sense and precaution.

Trade controls

Grupo México complies with all applicable trade control laws and regulations, which may prohibit or restrict sales or transactions involving certain products and services to certain countries, persons or entities to ensure international peace and security.

Purchasing goods and services

We're committed to maintaining transparent processes in the selection of suppliers and contractors, and the procurement of goods and services, following our procedures to ensure impartiality and equal opportunity between potential suppliers, based on conditions of delivery, quality, cost, time of service, experience and prestige, as well as adherence to this Code and other Grupo México principles and regulations.

Additionally, we strive to build effective and sustainable value chains, developing providers, and working with suppliers and contractors who operate according to our values and who observe our standards of quality, workplace safety and environmental care as socially responsible companies, and who comply with applicable laws and regulations, to build relationships that ensure the continuity of the business and which will maximize results. We therefore ask our third parties to respect this Code and the Code of Conduct for Suppliers and Contractors.

Anticorruption

Grupo México prohibits all forms of corruption, including bribes, illicit payments and trading influences, and offering and accepting these types of actions will be severely sanctioned, as well as participation in any act of bribery. This applies to any activity between civil parties or with public servants.

It is important to review the accounting records and receipts for all payments made to government agencies or individuals, and also to ensure that all third parties acting in representation of Grupo México adhere to the terms outlined in this section.

Consult the Anticorruption Policy for more information or direct questions to the head of the Legal department and/or the Compliance Officer.

Gifts

We know that our stakeholders, including suppliers, contractors, customers and third parties, will occasionally gift us business courtesies. Offering and receiving gifts is permitted, provided the gift or courtesy falls within the parameters outlined in the corresponding Grupo México policies or the Policy on Hospitality, Gifts and Courtesies, and the gift is for legitimate business reasons. Accepting gifts or courtesies that could influence (or give the appearance of influence) the decision-making of Grupo México or a third party is not permitted.

Soliciting, negotiating or accepting gifts or courtesies from third parties for personal gain or for the gain of others is not permitted. Soliciting or accepting donations for charitable purposes is also not permitted, unless Grupo México, via the Grupo México Foundation and/or in collaboration with other companies, formally decides to support a dedicated campaign for a specific cause.

Questions should be directed to the Compliance Officer.

Donations and political involvement

Only the Executive President, and the Executive Presidents and/or CEOs of the different divisions of Grupo México are authorized to make charitable donations on behalf of the companies that form Grupo México.

Under no circumstance are Grupo México employees permitted to use Company funds to make contributions or donations on behalf of Grupo México.

Grupo México makes no political contributions and does not directly participate in the activities of political parties. Grupo México does not support any individual politician, political party, elected official, candidate for public office, or political campaign.

However, all Company personnel, as individuals, have the right to support and participate in political activities in our communities and society, provided these activities are not associated with Grupo México. When we make political contributions as individuals, we must do so in our free time and with our own resources, ensuring we do not act on behalf of Grupo México when engaging in any political activity. Grupo México assets, resources, equipment or trademarks may not, under any circumstance, be used for political activities or contributions.

We will not use our positions, duties or authority in Grupo México to influence another person to participate in any political activity or to exercise their political or civil rights in any particular manner.

Anti-money laundering

Money laundering is a financial or commercial transaction intended to conceal isolated or ongoing illegal acts to make these appear legal. The purpose is to conceal the origin of funds obtained from illegal or criminal activity (drug trafficking, arms smuggling, corruption, fraud, prostitution, extortion, piracy and/or terrorism). These transactions are generally conducted at different levels to give the appearance of resulting from legitimate activities and to move around the financial system without detection. Grupo México prohibits participating in any transaction in which there is any suspicion that it may be linked to money laundering. Any such incident must be reported to the Ethics Committee and the Compliance Officer immediately. We are all responsible for not engaging in business with third parties where there are indications that the other party is involved in money laundering activities. Therefore, employees and third parties acting on behalf of Grupo México are required to be familiar and to comply with all anti-money laundering and terrorist financing laws and regulations, and to comply with the corresponding Company policy.

Business decision-making

Business decisions must be informed and made in good faith and in the best interest of Grupo México, in adherence of the following guidelines:

- a) All applicable laws and Grupo México policies and company codes must be respected.
- b) There must be no conflict of interest.
- c) Decisions must be made within the levels of authority established by Grupo México.
- d) Decisions must be made on consideration of the facts and information available.

Compliance with tax obligations

Grupo México complies with all tax laws and regulations applicable to our operations in each country where we operate. We also comply with international tax laws.

Community and society

At Grupo México, we understand that creating value in the communities where we operate is fundamental for the development and continuity of our organization. We foster transparent and clear communication with our various stakeholders, being inclusive with vulnerable and indigenous communities to build a culture of collaboration and sustainability for the benefit of all.

We foster creating shared value with our workforce and our neighbor communities, through social development plans, whose ongoing improvement processes are based on the individual and collective commitment to continually increasing our capacity for development and self-management, under a framework of social co-responsibility as an engine that drives the common good. We ensure our resources are invested with transparency at all stages of the project, implementing a management system aligned with the Company's goals.

Grupo México is an ally to the community and local governments when emergency situations occur.

We identify and, insofar as possible and appropriate, involve stakeholders in our activities and projects in order to understand their expectations and concerns, to maximize the creation of value and ensure the sustainability of our operations.

The environment and sustainable development

At Grupo México, we minimize and compensate any potentially adverse impacts and

we ensure environmental management is an integral part of all our processes, covering each of the stages in the lifecycle of our operations.

Therefore, at Grupo México, we're committed to protecting and preserving the environment through actions such as:

- Meeting compliance with the environmental laws and regulations applicable to each of our operations.
- Promoting environmental best practices and setting goals that include environmental best practices for the sector.
- Employing processes that aid in the conservation and efficient use of energy and water at all our operations and facilities.
- Implementing ongoing improvement in our processes to protect the environment and minimize the impact of our operations, and reduce the risks and minimize the potential damage that our operations may cause (to soil, waste generation, discharges, emissions, wildlife, etc.).
- Reducing our carbon footprint.
- Conserving water through more efficient production processes and contributing to the availability of this resource in the regions where we operate.
- Promoting energy efficiency.
- Contributing to the protection and conservation of biodiversity.
- Lastly, our commitment to training Company personnel on all the points mentioned above.

We strive for ongoing improvement in our environmental performance to achieve a responsible use of natural resources, complying with the strictest standards for the prevention and mitigation of environmental impacts.

Media relations

At Grupo México, we understand the importance of safekeeping Company and third party information, and not disclosing this information without authorization, particularly when this action could compromise or cause damage to Grupo México, our shareholders, customers, suppliers, employees and other stakeholders.

Contact with the outside media is through the areas and/or people authorized by the Grupo México Communications department. Media requests should be forwarded to the Grupo México Communications department.

Violations and sanctions

As the seriousness of the violation or infraction warrants and in accordance with applicable law, Grupo México personnel will be required to cooperate with any internal or outside investigation and will uphold confidentiality on all related matters.

Any employee who reprimands another person who, acting in good faith, has reported a violation of this Code of Ethics or other Company rules and regulations will receive severe sanctions that may include termination for cause.

Violations of this Code of Ethics include:

- Breach of our principles or obligations.
- Asking or instructing other employees to breach our principles or obligations.
- Failure to report violations observed.
- Failure to cooperate or obstructing investigations.

These violations will result in disciplinary measures that will be applied consistently and proportionate to the circumstances and seriousness of the infraction.

One or more of the following sanctions may be applied, among others and at the discretion of the Ethics and Discipline Committee:

- Verbal reprimand.
- Written reprimand.
- Temporary suspension from duty or from certain benefits.
- Termination, and
- Other legal actions that may be warranted.

Reporting Line

Grupo México has a system in place to receive and investigate reports of irregularities and incidents received via the Reporting Line in each Division.

The purpose of the Incident Reporting Management System is to:

- Encourage and facilitate reporting irregularities and incidents.
- Support and protect whistleblowers or complainants and other people involved.
- Ensure reports are handled appropriately and in a timely manner.
- Improve the organizational culture, governance and the prevention of irregularities.
- Enable Grupo México to identify and address irregularities as early as possible.
- Help prevent or minimize the loss of assets and to recover lost assets.
- Ensure compliance with company and outside rules and regulations.
- Foster employee commitment to the values and culture of the organization.
- Promote a culture of transparency where collaborators, third parties and stakeholders feel safe to report concerns about irregularities and incidents.
- Demonstrate ethical and sound governance practices.
- Ensure violations of our Code of Ethics are sanctioned.

The following are considered irregularities and can therefore be reported via the reporting channels provided by Grupo México:

- Unethical behavior or behavior contrary to that expected and expressly indicated by the Company for its collaborators and stakeholders.
- Fraud.
- Corruption (including bribery).
- Violations of company and outside rules and regulations.
- Violations of the Code of Ethics.
- Gross negligence.

- Acts of Discrimination, Non-Inclusivity, or Sexual or Workplace Harassment.
- Violation or risk of violation of human rights.
- Damage or risk of environmental damage.
- Threat or risk of threat to safety.
- Harm or risk involving occupational health.

If you witness or have been a victim of any irregularity, report the incident via the Reporting Line and contact your immediate supervisor or the heads of the Human Resources, Audit or Legal departments and/or the Compliance Officer.

Collaborators, third parties and stakeholders may also use the reporting line to report actual or potential situations that may constitute violations or irregularities.

In adherence of international best practices and to clarify the commitments, objectives and operation of the Incident Reporting Management System, each Division issues its own Incident Reporting Policy that:

- Outlines the objectives of the Reporting Management System.
- Defines the scope of the Reporting Management System.
- Sets the organization's commitments.
- Prohibits harmful behavior.
- Guarantees access to the Reporting Management System and encourages its use.
- Ensures the Reporting Management System achieves the intended results.
- Establishes the types of protective measures the organization may implement for complainants and whistleblowers.
- States and guarantees there will be no reprisals for complainants or whistleblowers for filing a report.
- Describes the key steps in the investigation process, including receiving the report, the investigation, informing the complainant, reporting and compliance.
- Sets the criteria for handling the personal data of those involved, as well as the confidential information related to the report.
- Ensures an impartial investigation.
- Complies with the legal framework applicable to the organization in question.
- Is available and accessible to everyone in the organization, in their working language.
- Establishes how the information received through the reporting channels will be used and how proactive actions will be taken to identify risks and opportunities (ongoing improvement).

Contacts and means of reporting

It is important to provide detailed information when filing a report, to be able to follow up on the case. Reports can be submitted anonymously. Regardless, the complainant's identifying information will be protected and held confidential.

There are 4 channels through which a report can be made and the specific details for each are on the intranet of each Division:

Reporting Line for Grupo México:

Website: gm.lineadedenuncia.net
Email: gm@lineadedenuncia.net
Phone: 800 10 88 869

Reporting Line for the Mining Division:

MINERA MÉXICO

Website: gmm.lineadedenuncia.net
Email: gmm@lineadedenuncia.net
Phone: 800 10 88 869

SOUTHERN PERÚ COPPER CORPORATION

Website: spcc.lineadedenuncia.net/
Email: spcc@lineadedenuncia.net
Phone: 080 078 258

ASARCO

Website: asarco.lineadedenuncia.net/
Email: asarco@lineadedenuncia.net
Phone: 1 800 961 6771

MINERA LOS FRAILES

Website: mlf.lineadedenuncia.net/
Email: mlf@lineadedenuncia.net
Phone: 900 423 887

Reporting Line for the Transportation Division:

Website: gmt.lineadedenuncia.net
Email: gmt@lineadedenuncia.net
Phone: 800 10 88 869

Reporting Line for the Infrastructure Division:

Website: gmi.lineadedenuncia.net

Email: gmi@lineadedenuncia.net

Phone: 800 10 88 869

We encourage everyone to use the reporting channels responsibly by reporting complaints that are founded, reasoned, honest and presented in good faith.

The reporting channels will also receive inquiries as addressing a concern early may prevent a future incident.

Reviews

This Code of Ethics will be reviewed periodically to ensure it remains current.

This document may also be reviewed and modified, as necessary, when circumstances arise that were not initially covered or addressed, or in the case of issues that need to be addressed in a different or broader manner.

Ethics and Discipline Committee

The Grupo México Ethics and Discipline Committee is the body responsible for overseeing compliance with this Code of Ethics and for identifying and proposing appropriate actions on the occurrence of violations or unforeseen situations, as necessary, in accordance with applicable legal regulations and the Grupo México rules and regulations.

The Ethics and Discipline Committee ensures Grupo México employees are informed, trained and certified in the content of this document to ensure compliance.

Culture of Compliance

At Grupo México, we know that the regulatory framework undergoes constant changes that bring in different rights and obligations. We are committed to complying with all laws and regulations applicable to our operations, and also the Policies, Procedures and other rules and regulations of Grupo México to build a solid culture of compliance and maintain our competitive edge and our good reputation.

It is our responsibility to remain always at the forefront and to be well-informed in order to defend and represent the interests of Grupo México the best we can.

Grupo México will conduct media campaigns within and outside the company to inform our collaborators and related parties.

Compliance Committee

The Grupo México Compliance Committee is made up of the Compliance Officers of the Mining Division, the Infrastructure Division and the Transportation Division, and the Corporate Compliance Officer of Grupo México, who chairs the committee.

The Compliance Committee reports to the Grupo México Audit and Company Practices Committee, and the committee operates independently (without interference or pressure from the organization) to perform their compliance-related tasks.

Grupo México will provide the necessary resources to establish, implement, maintain and carry out the ongoing improvement of the compliance management system.

The Grupo México Compliance Policy provides more information and details about the compliance function. Grupo México ensures this Policy is disseminated, understood and observed by everyone in the organization, as well as by third parties with whom we have dealings.

Questions

Questions or concerns regarding the content of this Code of Ethics or regarding compliance with other Company rules and regulations should be addressed to the Compliance Officer.

You may also contact your immediate supervisor, manager or director, or the heads of the Legal and/or Human Resources departments for your division.

