

CODE OF ETHICS

SSA Mexico S.A. de C.V. (“SSA”) and its affiliates are committed to conduct their business relationships with the highest ethical and legal standards, aimed at complying with integrity the laws and regulations of all countries where they do business; this with the purpose of contributing positively to the development of these companies. SSA and its affiliates integrate ethical, legal, social, and environmental factors into their supply chain and are committed to establishing a framework of trust and collaboration with external collaborators, vendors, customers, and authorities. In accordance with the guidelines set forth in the Code of Conduct and the Standards of Professional Ethics, SSA and its affiliates have prepared this Code of Ethics (“Code”) to maintain stable and lasting business relationships with the purpose of achieving continuous improvement in the procurement, contracting, or service processes, based on excellence, trying to ensure that its external collaborators, vendors, and customers have their own policies respecting the principles contained in this Code. Everything indicated in this Code is mandatory for all external collaborators, vendors, and customers, and/or any other third party that has a business relationship with SSA and its affiliates.

1. Comply with applicable laws as responsible companies.

SSA and its affiliates expect their external collaborators, vendors, and customers to share their commitment to comply with the law by avoiding any conduct that, even without violating the law, may damage the reputation of SSA and its affiliates, causing adverse consequences for the companies or their environment, by:

- Knowing and following the laws applicable to you and your business. □ Treating legal requirements as a mandatory standard.

2. Operate with integrity

SSA and its affiliates do not tolerate any form of corruption or bribery in any of the activities they perform, and in the same way, this is also expected of their external collaborators, vendors, and customers. External collaborators, vendors, and customers must maintain the highest standards of moral and ethical conduct at all times, not participating in any way in corrupt practices with the intention of influencing any government official, company, organization, and/or persons with respect to any act or decision, or to obtain or retain a business or other improper advantage, whether it be economic, business, or otherwise. SSA and its affiliates seek and wish to maintain business relationships based on mutual trust, transparency, and responsibility, and therefore asks its external collaborators, vendors, and customers to:

- Compete in a fair and ethical manner for bids/applications by SSA and/or its affiliates.
- Not offer, promise, give, receive, or make, directly or indirectly, any payment, gift, gratuity, sponsorship, preferential treatment, or benefit of any kind that is intended to influence, or attempt to influence, to obtain an unjustified benefit or advantage in the decisions of SSA.
- Not promise, offer, or grant to any executive, manager, employee, or collaborator of a company, partnership, association, foundation, or organization a benefit or advantage of any kind, not justified, to favor it or a third party over others, failing to comply with their obligations in the acquisition or sale of goods or in the hiring of services. Most of the

time, companies are prosecuted for the actions and/or decisions taken by their agents, consultants, representatives, and/or members of affiliates.

- A conflict of interest exists when a personal, family or friendship situation or any other type of external circumstance may affect the professional objectivity of those involved in a procurement, contracting, business opportunity decision, and/or any other decision inclined to favor the specific interests of a third party and/or favoring the conditions of the latter, therefore, collaborators, vendors (including their collaborators and third parties hired by them), and customers, shall avoid any conflict of interest (financial or otherwise) and shall give notice to SSA and/or its affiliates at the beginning of their business relationship or as requested, if any shareholder, member of its management body, or any of its employees, related to the aforementioned contracting or procurement, has maintained an employment relationship with SSA and/or its affiliates, and/or currently has a relationship with an active or inactive employee of SSA and/or its affiliates.
- Work with its own vendors to promote business conduct in accordance with the principles of this Code.
- Not request, offer, promise, receive, or demand, directly or indirectly, any kind of payment, gift, gratuity, sponsorship, preferential treatment, or benefit of any kind that is intended to influence, or attempt to influence, to obtain an unjustified benefit or advantage in SSA contracting.

SSA and its affiliates are committed to comply with the U.S. Foreign Corrupt Practices Act (“FCPA”) wherever they operate, as issued by the U.S. Securities and Exchange Commission; the Federal Law for the Prevention and Identification of Transactions with Resources from Illegal Sources (*Ley Federal para la Prevención e Identificación de Operaciones con Recursos de Procedencia Ilícita*) and its regulations; and the Federal Criminal Code (*Código Penal Federal*), the State Criminal Codes applicable in Mexico, and any other applicable law or international treaty.

Likewise, SSA and its affiliates expect their external collaborators, vendors and customers to comply with the following:

- Do not manipulate legal, tax, financial or any type of information that is intended to influence, or try to influence, to obtain an unjustified benefit or advantage in contracting.
- Not carry out deliberate illegal acts independently or in complicity with their own vendors or external collaborators in order to obtain a benefit or advantage.

3. Keep accurate and true records

SSA and its affiliates expect their external collaborators, vendors, and customers to keep their records updated, accurate, and transparent, i.e., with truthful and verifiable information. This will help to make responsible business decisions based on the information provided.

Likewise, SSA and its affiliates expect their external collaborators, vendors, and customers to:

- Maintain an adequate system of accounting records of all transactions, expenses, and income incurred, without omitting, concealing, or altering any data or information, so that the accounting and operating records accurately reflect reality.

- Implement internal compliance and audit processes for quality, environmental, and health and safety matters.
- Provide information at the request of SSA and/or its affiliates: whether legal, tax, accounting, or quality, environmental, health, and/or safety management systems allowing audits to be conducted for compliance with this Code.
- Perform continuous improvement action plans for compliance with the findings found during the audits.

4. Comply with commercial obligations

SSA and its affiliates expect to work with employees, vendors, (including its employees and third parties hired by it), and customers, who share the same desire to engage in business relationships based on honest communication, mutual respect, and performance of commitments. Share the same commitment to operate in an honest and transparent manner, and to perform their business obligations and manage unforeseen events in a proactive, timely, and open manner.

5. Manage Human Resources with dignity and respect.

SSA and its affiliates expect their external collaborators, vendors, and customers to prioritize the safety, well-being, and dignity of all people whose work helps to carry out their activities or services.

Therefore, SSA and its affiliates expect their external collaborators, vendors, and customers to comply with safe and healthy working conditions such as:

- Never using or tolerating the use of human trafficking, forced labor, or child labor, as defined by the International Labor Organization (ILO).
- Promoting an inclusive work environment, free of any type of harassment or discrimination, violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, physical or psychological coercion, physical disability, pregnancy, religion, political or union affiliation, public humiliation or verbal aggression or threats.
- Not requesting pregnancy or virginity tests or physical examinations that may be used in a discriminatory manner.
- Respecting the rights of employees to organize, bargain collectively, and hold peaceful collective meetings, and refraining from engaging in such activities.
- Establishing the relevant communication channels for workers or their representatives to express their proposals, complaints, or suggestions to the organization.
- Complying with all legal requirements regarding rights, benefits, remuneration, and working conditions.
- Providing labor agreements in the native language, describing the responsibilities, benefits, rights, and working conditions of the employment relationship in compliance with applicable laws in Mexican territory.
- Promoting volunteer work, establishing procedures for the termination of labor relations in accordance with the law.
- Establishing labor criteria for the integration of interns in the activities of the company, abiding by the procedures of the organization, subject to the legal provisions applicable in Mexican territory.

- Encouraging the practice of working hours, which should not exceed the maximum established in the laws and regulations in force in Mexican territory.
- Preserving the personal documents of the workers requested in the hiring process, allowing free access for consultation and/or updating during the employment relationship, complying with the provisions applicable in Mexican territory.
- Providing, in accordance with the provisions of the law, adequate places or periods for nursing mothers.

6. Protect the information, property, and interests of SSA and its affiliates.

SSA and its affiliates expect their employees, vendors, and customers to protect the reputation of SSA and its affiliates and any information exchanged with them as follows:

- Protecting any confidential information of SSA and its affiliates to which they have access, including intellectual property, trade secrets, or financial information.
- Protecting the assets and property of SSA and its affiliates while they are under its control.
- Implementing cybersecurity measures ensuring proper access to systems, digital platforms, computer equipment within the organization.
- Avoiding any situation that may adversely affect the commercial interests of the parties.
- Implementing safety programs to manage and maintain all operations and services in accordance with applicable safety standards.
- Implementing processes and standards designed to ensure the integrity of all transactions with SSA and its affiliates.
- Identifying and assessing potential emergency events in the workplace and anticipating as far as possible their impact through the implementation of emergency and intervention plans.

7. Promote quality customer service

SSA and its affiliates encourage its external collaborators, vendors, and customers to be considerate of the quality standards of customer service within their facilities. In this regard, external collaborators, vendors, and customers shall have a documented quality management system that complies with quality laws, standards, and regulations seeking:

- To implement quality processes to guarantee customer service.
- To implement campaigns for compliance with quality processes in the organization.
- To comply with quality, legal, and tax requirements, and the delivery of information prior to the start of activities, sale of products or services available to the customer.
- To keep the quality certificates of its organization up to date.
- To work with SSA and its affiliates to implement sustainable processes and correct issues to foster continuous improvement and customer service.

8. Health and Safety Measures

SSA and its affiliates encourage its external collaborators, vendors, and customers to comply with health and safety standards within their facilities. In this regard, external collaborators, vendors, and customers shall have an effective and documented health and safety policy that complies with applicable health and safety laws, rules, and regulations seeking to:

- Promote health and safety policies to mitigate risks in the performance of their activities, the use of equipment, materials, chemicals, biological products, tools, vehicles, and machinery for workers, pregnant women, and nursing mothers for safe work.
- Provide safety and protective equipment to workers for the performance of their activities.
- Implement risk awareness campaigns in the development of their activities.
- Obtain and keep up to date all necessary permits, licenses, and registrations.
- Identify and assess emergency situations for the implementation of contingency plans for a prompt response to such events.
- Conduct emergency drills in accordance with the provisions of Mexican law.
- Keep restrooms, work areas, common areas, and parking lots clean, illuminated, and ventilated, with access to drinking water and hygienic food preparation for workers.
- Promote health information campaigns with workers to mitigate occupational risks or diseases.
- Comply with health and safety requirements, and the delivery of information prior to the start of activities, sale of products or services available to the customer.
- Work with SSA and its affiliates to implement sustainable processes and correct issues to foster continuous improvement in health and safety.

9. Be a responsible global citizen

SSA and its affiliates encourage its external collaborators, vendors, and customers to be considerate of the environment and local communities by complying with environmental standards within their facilities. This extends to the timely and required maintenance of its raw materials, machinery and labor.

In this regard, external collaborators, vendors, and customers shall have an effective and documented environmental policy that complies with applicable environmental laws, rules and regulations, seeking to:

- Implement environmental procedures for the correct handling, segregation, and disposal of hazardous substances, solid waste, greenhouse gas emissions, water use, energy consumption, noise, to ensure environmental protection.
- Conduct awareness campaigns with workers on environmental care and waste recycling.
- Protect water resources by minimizing water use in its operations, avoiding water pollution and reducing the impact on the water resources of surrounding communities.
- Implement systems to ensure the safe handling, transfer, storage, recycling, reuse, and management of organic waste, chemical or hazardous substances, air emissions, and wastewater discharges. Any of these activities with potential harm to human health or the environment will be adequately managed, quantified, controlled, and treated before any substance is released into the environment.
- Obtain and keep up to date all necessary permits, licenses, and registrations.
- Comply with environmental requirements and delivery of information prior to the start of activities, sale of products or services available to the customer.

- Work with SSA and its affiliates to implement sustainable processes and correct issues to foster continuous improvement and social value.

SSA and its affiliates aim to establish relationships based on trust with external collaborators, vendors, and customers that follow the principles set forth in this Code, and are therefore expected to cooperate with reasonable requests for information, certifications, or access to information for the purpose of conducting an audit to verify compliance with the items set forth throughout this Code. In the event that SSA and/or its affiliates identify a circumstance that cannot be corrected or with which the external collaborator, vendor, or customer is unwilling to cooperate, SSA and its affiliates reserve the right to terminate the business relationship.

External collaborators, vendors, and customers are responsible for complying with the standards of this Code, for raising questions and for reporting any possible misconduct immediately upon becoming aware of it. Any violation or potential violation of the law, this Code, or other policies of SSA and/or its affiliates, must be immediately reported to the Legal Department or the Human Resources Department.

SSA and its affiliates have a reporting channel (ethical mailbox) on its website, the email Buzon.etico@ssamexico.com where external collaborators, vendors, and customers related to them can report any violations of this Code.