



CODE OF CONDUCT

MARITIME TRANSPORTATION, AIR TRANSPORTATION AND DRILLING



“ You must read this Code of Conduct that you now have in your hands, understand it, implement it, comply with it, respect it and make it your own”.

CME



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GLOSSARY

Code of Conduct or Code of CME Behavior:	This Code of Conduct.
Company or Group CME:	It refers to the corporate group made up of the company PROYECTOS GLOBAL DE ENERGÍA Y SERVICIOS CME, SA DE CV, and all its companies, affiliates, subsidiaries, holding companies and/or affiliates.
Collaborator(s):	Means any worker, service provider, administrator, director, partner, associate, shareholder, director, agent or legal representative of the Company.
Executive(s):	Means the General Director, Financial Director, Sales Director, Purchasing Director, Operations Director, Human Resources Director, Legal Director, Information Technology Director, Supply Chain Director, as well as any other Collaborator who has any position , commission, function, appointment or managerial position within the Company.
Department Legal:	The Company's Legal Department.
Computer equipment:	Any equipment, tool, mechanism, medium or physical, IT, electronic, digital or computing device provided by the Company to its Collaborators for the performance of their activities, for example: desktop computer, laptop, telephone, iPad , tablet (tablet), smartphone (smartphone), cell phone, computer, digital versatile disc (DVD), compact disc (CD), hard drive, portable memory, USB, internal or external memory, modem, router (router), controller energy, camera, headphones, keyboard, speaker, mouse, printer, scanner, email account, password, password, user, means of access, licenses, programs, permits, among others.
FCPA:	Foreign Corrupt Practices Act (FCPA) passed by the United States Congress in 1977.
Information:	Any type of information, secrets, plans, contents, files, documents, data, records, reports, audits, records, emails, images, photographs, videos, audios, sounds, passwords, passwords, means of access, users, messages, communications, calls, chats, conversations, applications, systems, programs, software, licenses, lists, databases, names, telephone numbers and addresses, whether on physical, digital, electronic or any other type of support.

GLOSSARY

Mexico: The United Mexican States.

internal rules of CME group: They cover all types of codes (including this Code of Conduct), policies, regulations, guidelines, guides, directives, instructions, indications, processes, directives, rules, notices, contracts, clauses, indications, instructions, contracts, recommendations and/or notices issued by the Company.

ILO: **International Labor Organization.**

Public servers):

- ✓ Any official, commissioner, servant or public employee, who renders his services in the Federal, state, local municipal Public Administration, whether inside or outside of Mexico, as well as in any agency, dependency, organ or governmental or parastatal body.
- ✓ Any official, commissioner, servant or public employee, who provides their services in the federal, state, municipal or local courts, tribunals and judicial powers, inside and outside of Mexico.
- ✓ Any civil servant, commissioner, servant or public employee, who renders his services in parliaments and federal, state, municipal or local Legislative Powers, inside and outside of Mexico.
- ✓ Any candidate to occupy a position, commission, function or public position, inside and outside of Mexico.
- ✓ Any person who exercises jurisdictional or judging activities within the various instances and courts of the federal, state, municipal or local Judicial Powers, inside and outside the national territory.
- ✓ Any person who has the power to influence, create or modify laws from federal, state, municipal or local parliamentary bodies, inside and outside of Mexico.
- ✓ Any international or intergovernmental organization, court, or public agency that conducts regulatory, judicial, or investigative activities, for example: the International Monetary Fund (IMF), the United Nations Organization (UN), the International Labor Organization (ILO), World Trade Organization (WTO), Organization of American States (OAS), Organization for Economic Cooperation and Development (OECD), World Bank (WB), Inter-American Court of Human Rights (IA Court), Financial Action Task Force (FATF), International Criminal Police Organization (INTERPOL), among others.
- ✓ A political party, national or foreign, or an active member of it.
- ✓ The senators and deputies of the Congress of the Union, the ministers of the Supreme Court of Justice of the Nation, the counselors of the Federal Judiciary, the secretaries of the Office, the Attorney General of the Republic, the Circuit magistrates and District judges, the President adviser, the electoral advisers and the executive secretary of the National Electoral Institute, the magistrates of the Electoral Court, the members of the autonomous constitutional bodies, the general directors and their equivalents of the decentralized organizations, companies with majority state participation, companies and associations assimilated to these and public trusts, the executives of the federal entities, local Deputies, Magistrates of the Local Superior Courts of Justice, the members of the Local Judiciary Councils, as well as the members of the organizations to which the Local Constitutions grant autonomy (all these, from Mexico and, if it exists, its counterparts abroad).

DECLARATION OF ACCEPTANCE

The CME Code of Conduct is an instrument created by Proyectos Globales de Energía y Servicios CME, SA de CV, with the aim that its Collaborators have a tool that serves to guide their work, providing them with a focus on service, ethics and legality in the performance of their duties.

With this in mind, this Code of Conduct was written, which you now have in your hands and which you must read, understand, implement, comply with, respect and make it your own, in such a way that you always take into account the duties inherent to your assignment and the enormous responsibility that It takes assuming them.

RECIPIENTS OF THE CME CODE OF CONDUCT

This Code of Conduct is addressed to all Company Collaborators.

PURPOSE OF THE CME CODE OF CONDUCT

- ✓ Reiterate and make known to our Collaborators the fundamental values and business principles of CME.
- ✓ Provide the general frame of reference for our actions as CME Collaborators.
- ✓ Protect, strengthen and promote the trust that clients, Collaborators, suppliers, authorities and the general public have placed in the Company due to our adherence to legality, professionalism and ethics in the provision of our services.
- ✓ Generate an additional line of communication between the Company and its Collaborators, so that they promptly report suspected violations of this Code, the internal regulations of Grupo CME or the laws in force related to the services provided by the Company.

VALUES AND PRINCIPLES OF CME GROUP

The **fundamental values** , although not the only ones, that distinguish the Company and represent the basis that governs its activities and our actions as Collaborators, are:

ETHICS RESPECT SERVICE HONESTY
 INTEGRITY QUALITY RESPONSIBILITY
 COMPETITIVENESS LEGALITY

Likewise, Collaborators must respect the following **principles**:

- ✓ Our activities as Collaborators of Grupo CME must be carried out seeking maximum efficiency, professionalism and satisfaction of our clients.
- ✓ Avoid engaging in conduct that may put the Company, other Collaborators or any third party at risk or harm.
- ✓ Comply with the provisions of this Code of Conduct, the internal regulations of Grupo CME and current laws.
- ✓ Refrain from activities that are not directly related to your position or responsibilities.

PROFESSIONALISM



It is the obligation of the Company and its Collaborators to always keep us informed of the advances and technical, operational, scientific, technological and legal changes that arise in the various fields in which we work. In addition, it is the obligation of both to try by all possible means to improve the quality of our services, both in the technical and human aspects. This is important in order to reduce the level of occupational, legal and accident risks.

COMMUNICATION



At Grupo CME we know that the basis of trust and organizational unity is sincerity. For this reason, we must all **conduct ourselves truthfully** in our relationships with other Collaborators and in all communications that we carry out as a result of our activities in the Company.

SUM OF TALENTS AND KNOWLEDGE MANAGEMENT



The talents are spread out differently, so no one has the (single) answer in their pocket; The answers that we have to give to the problems that we face on a day-to-day basis are built by all of us, each one putting the part of knowledge that complements the limitation of others and trying to incorporate the knowledge of others into our own experience.

Humility does not consist in not knowing, but in accepting the reality of our limitations and at the same time recognizing our talents.

Our policies are based on knowledge management, whose starting point is the recognition of our own limitations and the need to contribute to the improvement of the group with our talents. Grupo CME is a “**learning organization**”, where we all learn and share knowledge.



INSTITUTIONAL LOYALTY



In order to respond to the problems that arise at work, we must maintain the "**corps spirit**" **at all times**, which leads us to feel proud of the Company of which we are a part, always being ready to defend it and put it before others. particular interests when we carry out our work. We know how to maintain the due secrecy of those things that concern work and are entrusted to us in a confidential manner. Likewise, we warn our superiors and Directors of the risks that arise for the good name and integrity of Grupo CME in the various fields in which it operates or in which its action impacts.

The principle of institutional loyalty would be violated if activities are carried out that are in conflict with the interests of the Company or even that generate a perception of conflict of interest.

COMPLY WITH INTERNAL RULES OF CME GROUP AND THE LAWS



The Collaborators and the Company are governed by the internal regulations of Grupo CME, as well as by various federal, state, municipal and local laws, both inside and outside of Mexico, for this reason, we must **know, understand and respect them**.

If you have questions about the internal rules of CME or the laws that govern us, you should always go as soon as possible to the Company's Legal Department to clarify your questions.



RESPECT HUMAN RIGHTS



At Grupo CME we know and recognize that the dignity of the person is the foundation of their human rights. Therefore, we encourage respect for each of our Collaborators and promote in all our activities that their rights prevail over any other personal or collective interest.

The activities that the Collaborators and the Company carry out must be carried out with total respect for people and their **human rights**, which are those recognized to all people for the mere fact of being human, for example, the right to life, dignity, health, equality, intimacy, heritage, security, education, work and freedom (which includes both freedom of movement and freedom of expression, decision, thought, religion, etc.).

Likewise, in the CME Group we are committed to promoting the principles of respect and promotion of human rights, in accordance with the provisions of the **PACT WORLD OF THE UNITED NATIONS** (UN Global Compact) in the terms indicated below:

Grupo CME must support and respect, within its sphere of influence, the protection of internationally recognized fundamental human rights, both for its Collaborators and for people who are in some way related to our products and services, whether as suppliers, franchisees, business partners or customers.

Grupo CME will ensure at all times that its companies are not complicit in acts that violate human rights, which will be the reason for permanent surveillance by the Directors in their respective work areas.

Grupo CME must support freedom of affiliation and the effective recognition of the right to collective bargaining for its workers, in accordance with the provisions of applicable laws and the ILO.

Grupo CME must support the elimination of all forms of forced or coerced labor.

Grupo CME will not hire minors under any circumstances and is committed to supporting the eradication of child labor in companies, as well as the work of undocumented migrants.

Grupo CME is committed to adopting a labor policy of tolerance and non-discrimination. In addition, we make our commitment to support campaigns to abolish discriminatory practices in employment and occupation.

Grupo CME must maintain a preventive approach that favors the environment, as well as flora and fauna, and is committed to trying to spread this purpose as one of its philanthropic and social responsibility activities.

Grupo CME will promote the development and dissemination of environmentally friendly technologies.

Grupo CME will work against corruption in all its forms, including extortion and bribery that directly affect people in precarious or vulnerable situations.

THE VALUE OF OUR COLLABORATORS



Our Collaborators are not "resources" of "manpower" or spare parts on an "assembly line", but human beings with dignity who contribute their talent, experiences and knowledge to our Company. For this reason, they are considered a fundamental part of the **HUMAN CAPITAL STRATEGY**, whom we wish to strengthen, retain and promote so that they can grow professionally, knowing that the improvement in the quality of our products and services depends on their growth and, finally, of productivity that benefits everyone.

As a consequence of the assessment we make of knowledge management and talent recognition, we make our own the metaphor of the **employee as an investor**, since we know that their work does not constitute a sale of labor, but rather an indispensable contribution to the development, growth and prestige of the Company. For this reason, we are especially interested in training, because in addition to contributing to the optimal performance of the functions that each one performs within the Company, it favors the growth and personal development of their human capital.

In correspondence with the recognition that is made of the value of work, all Collaborators commit to **comply with the goals set in terms of training**, attending and obtaining the certificate and knowledge corresponding to the courses, programs, diplomas and other training events. that are organized by Grupo CME.

Grupo CME undertakes to respect the provisions of the ILO Declaration on **fundamental principles and rights at work, labor freedom and respect for people**, taking into account their particular needs and their own circumstances. From this perspective, the selection, promotion, compensation and bonus processes are intended to achieve a constant incentive and professional and personal development for our Collaborators, therefore, these processes are carried out with equal opportunities, taking into account objective productivity criteria. , professionalism and efficiency.

THE VALUE OF OUR SUPPLIERS



The satisfaction of our clients is largely due to the quality of services and products that the Company receives from its suppliers.

The selection of our suppliers is based on equal opportunities and objective criteria, such as: price, quality, experience, their culture of respect for the law, among others. Contracting suppliers under subjective, impartial, discriminatory, illegal or contrary to what is established in the internal rules of Grupo CME is prohibited.



NO TO DISCRIMINATION



We believe that diversity constitutes the strength of our Company, therefore, all types of discrimination based on ethnic or national origin, gender, age, disabilities, social status, health conditions, religion, opinions are prohibited. , sexual preferences, marital status or any other circumstance, characteristic, situation, fact or aspect that violates human dignity or their rights or freedoms.

Likewise, any comment, ridicule or offensive, rude or demeaning joke for any of the reasons indicated in the previous paragraph is prohibited.

In order to make this respect for diversity a reality in daily life, it is necessary to use courteous and inclusive language, and treat people with kindness and care, respecting their privacy at all times and always seeking their well-being.

NO TO VIOLENCE



We try to ensure that there is a work climate in the Company based on mutual respect, for which the use of any type of violence, intimidation, retaliation, revenge, attack, threat, aggression, blackmail, pressure, extortion, coercion or coercion, as well as harassing, harassing, harassing, abusing, harming, harassing, annoying, annoying or making fun of any Collaborator or third party related to the Company.

NO TO HARASSMENT



Any insinuation, intimidation, solicitation, assault, proposal, conduct, mockery, joke, act or comment of a sexual nature that is unwelcome or unsolicited by the recipient is prohibited.

Do not insinuate, demand, suggest or request favors, benefits, conduct or acts of a sexual nature or of any other kind, taking advantage of the position, commission, power, responsibilities, powers or authority that your position as a Collaborator within the Company may give you.



NO TO FRAUD



At the Company we believe in the honesty of our Collaborators as well as in the value of the trust we place in them, therefore, at Grupo CME we believe that fraud is not only cheating or taking advantage of another person's error or mistaken perception. found to obtain an undue profit or benefit; It will also be any dishonest, improper, incorrect, irregular, disloyal, illegal, illicit, unprofessional and/or advantageous conduct committed by the Collaborator and that may cause damage to the Company, other Collaborators or any third party related to the Company, because said behaviors are an objective reason to lose the trust that Grupo CME places in its Collaborators.

Therefore, we reiterate that it is prohibited to plan, direct, carry out, incite, collaborate, attempt, hide or cover up conduct that is or may be fraudulent.

NO TO THEFT



We must respect what is not ours, therefore, in Grupo CME it is forbidden to steal, take, hide or appropriate money or things, whether intangible or tangible, that do not belong to you.

Due to the foregoing, we reiterate that it is prohibited to plan, direct, carry out, incite, collaborate, attempt, hide or cover up conduct that is or may be constitutive of theft.

NO TO CORRUPTION

• ZERO TOLERANCE

In compliance with the anti-bribery and anti-corruption laws of Mexico and the United States of America, and in accordance with the provisions on these matters in the other countries where the Company operates, we make our commitment to prevent and combat corruption within our Company with a policy of zero tolerance, for which any activity that tends to promote, offer, give, perform or conceal bribes to public servants with the purpose of obtaining contracts, privileged information or any other improper benefit that places Grupo CME in an advantageous situation is strictly prohibited. to our competitors or for the Company to receive any preferential treatment.

• APPLICATION OF ANTI-CORRUPTION REGULATIONS

The Company undertakes to comply with the provisions in this matter, both in the General Law of the National Anticorruption System, as well as in the Federal Criminal Code, the National Code of Criminal Procedures of Mexico, the FCPA, as well as other laws that both inside and outside of Mexico must be complied with by our Company to prevent corrupt practices and bribery.

Any violation of these laws may result in administrative, civil and criminal liability for the offending Collaborator and for the Company, whether inside or outside of Mexico.

Even though the FCPA is not a Mexican law, it is applicable to our Company considering the nature of its operations and the need for reciprocity with international companies. Therefore, it is mandatory for Grupo CME and its Collaborators. Under the FCPA, for example, offering bribes, giving gifts, or doing favors of any value to a public official (or to third-party intermediaries who may transfer the bribe or gift) in order to obtain favorable business treatment from the Company constitutes an illegal act.

Grupo CME endorses the principles that inform the most important document of the UN on anti-corruption, that is, the United Nations Convention against Corruption, especially in those aspects in which the public sector and the private sector converge as actors and promoters of the fight against corruption.

• PROHIBITION

Therefore, we declare that it is strictly prohibited in our Company to carry out any acts that tend to influence the decision of public servants, as well as to make bribes indirectly, through a third party or an intermediary, such as franchisees, consultants, distributors, suppliers or contractors or a partner in a *joint venture*.

Directing, organizing, inciting, instigating, inducing, participating, collaborating, helping, cooperating, attempting, hiding, tolerating, covering up, executing or carrying out conduct that is or may be acts of corruption or that tend to influence the decision is prohibited. of public servants to unduly favor the Company.

Some examples of conduct that can be considered acts of corruption:



Solicit, accept, offer or make bribes to public servants.



Request, accept, offer or make facilitation payments, which are those made to public servants to illegally or improperly avoid or expedite procedures.



Make facilitation payments or bribes directly to public officials or indirectly through a third party or intermediary, such as franchisees, consultants, distributors, suppliers or contractors or a partner in a *joint venture*.



Offering or promising public servants any favor, gift, money or benefit in exchange for obtaining an undue advantage, profit or benefit for the Company.



Allow, tolerate, hide or cover up any of the behaviors indicated in the previous paragraphs.



Use the salary or consideration you receive for your services in the Company, to carry out any of the behaviors described in the previous paragraphs, since once the Collaborators receive their salary or consideration, they are fully responsible for the due protection of it, as well as for give it a lawful use and destination, therefore, it is prohibited to use it for the payment of any type of bribe for the alleged benefit, advantage or representation of the Company.

• REASONABLE EXPENSES

Those reasonable and legitimate expenses made by the Company to cover trips, food or lodging of public servants when necessary for the demonstration of products and services or to visit facilities will not be considered acts of bribery or corruption.

• GIFTS

Receiving and giving gifts is part of social life, but it is unacceptable to give monetary gifts or benefits with the intention of influencing public servants to obtain illegitimate advantages in favor of the Company. Any gift that is given must be made openly and in accordance with the FCPA, applicable laws and the internal regulations of Grupo CME, and in no case may the gift or benefit be given if it can be perceived as a form of bribery that contributes to influence the public servant on decisions that he will make related to the Company.

• PRELIMINARY INVESTIGATION

It is the obligation of all Directors and Collaborators, within the scope of their powers and tasks, to carry out a preliminary investigation of the background and trajectories of the organizations or persons with whom the Company signs contracts or intends to establish a commercial relationship. To do this, you must use the 'Guides for reviewing potential suppliers or franchisees' that Grupo CME has.

• CONTRACTING PROHIBITION

Consistent with the principles and values that it has held since its foundation, Grupo CME prohibits its Collaborators from contracting with third parties when, based on the information obtained from the aforementioned legitimate process of prior investigation or, for any other legitimate reason, they become aware of that these third parties have resorted to illicit or corrupt means to obtain any tender, contract or benefit.

It is enough that there is only reasonable suspicion to suspend any negotiation, exchange or commercial relationship with these companies or persons. Non-limiting examples of these reasonable suspicions are the following:

- ✔ If the third party (possible contractor) is recommended by a public servant related to the matter of the possible contract between the Company and the third party.
- ✔ That there is any family, affective or professional relationship between the third party and a public servant related to the subject matter of the possible contract between the third party and the Company.
- ✔ When the third party proposes or insinuates that the deal be closed "with a handshake", that is, without the existence of a written contract or pretends not to comply with formal elements of public contracting.
- ✔ When the third party refuses to include anti-bribery and anti-corruption clauses in the possible contract with the Company.
- ✔ When the third party applies a rate, fee or commission that is excessive or unreasonable compared to average market rates.
- ✔ When it is known that the third party with whom the possible contract is negotiated has low standards in terms of regulatory compliance, anti-corruption or corporate ethics.

• PRIOR INFORMATION ON DONATIONS

In order to detect possible bribes or acts of corruption disguised as alleged philanthropic donations or sponsorships, the Collaborators in charge of making or legally formalizing contracts with potential clients and suppliers, must previously comply with the following precautionary measures, which are established by way of example: and not limiting, and may vary from case to case:

Request the third party (possible contractor) their policies for proper handling of the donations, sponsorships and philanthropic contributions it makes.

Verify that donations, philanthropic contributions and third-party sponsorships are made at the right time, preventing them from being made when tenders, contests, or contracting or negotiation processes with public servants are in progress.

Define clear policies in the Company regarding philanthropic contributions, donations and sponsorships, and require third parties to do the same.

Evaluate Collaborators and third parties regarding their relationship with philanthropic organizations or people who will benefit from possible donations or sponsorships made by the third party or by our own Company, to identify possible conflicts of interest or simulated practices of favoritism, bribery or corruption .

Grupo CME undertakes to disclose, through its website, the philanthropic contributions, donations and sponsorships it makes (unless confidentiality is required by law) and will request the same from third parties with whom it establishes business relationships. In any case, it is the policy of this Company that all donations, sponsorships or philanthropic contributions have the prior approval of the Director General or persons in whom he delegates that power.



NO TO CONFLICT OF INTERESTS



A conflict of interest exists when an interest of the Collaborator (whether personal, economic, family, labor or of any kind) affects or could affect the due performance of their activities in Grupo CME.

Example: *that a Collaborator in charge of contracting suppliers is the parent of one of the suppliers who intend to provide services to the Company. In this case, there would be a conflict of interest, because due to the family relationship with his son, the Collaborator may not perform his functions impartially and objectively, since he would be inclined to hire his son, even when he does not present the best commercial hiring conditions. compared to the other providers.*

Conflicts of interest can take many forms, not all of which can be specifically mentioned. The following are just a few examples of conflicts of interest that can and should be avoided:

- ✓ Carrying out an activity that conflicts with the Company's business.
- ✓ Having a shareholding or other type of business relationship with a competitor, supplier or distributor of the Company and not making it known to the Directors of Grupo CME.
- ✓ Carrying out Company business with or on behalf of a family member of the Collaborator, including business with any supplier or distributor of Grupo CME, without the prior consent of the Company.
- ✓ Being a collaborator, officer, director, worker, consultant, administrator, partner, shareholder, agent or legal representative of a competitor, supplier or distributor of Grupo CME, without the written approval of the Company.
- ✓ Any Company Employee who is in a position to give or receive a gift or to entertain or be entertained by business partners assumes the responsibility of ensuring that their actions comply with our policies regarding conflicts of interest.
- ✓ In general, any situation in which our Collaborators are influenced or even, when they seem to be influenced, by considerations that benefit them personally or any third party with whom they have a link or interest, generating a conflict with their obligations and responsibilities towards the Company. .

If a conflict of interest arises in which you are or may be related, even if you consider that it will not affect the proper performance of your duties, you must immediately notify the Legal Department or your hierarchical superior, so that the Company can make the necessary decisions to address the conflict. situation.

Collaborators with Management positions within Grupo CME who wish to participate in the board of a non-profit organization or intend to provide services as a consultant or employee of a third party, must previously consult the Legal Department or the General Director and obtain their approval. .

NO TO ALCOHOL AND DRUGS



Within the vessels, facilities and work areas of the Company or operated by Grupo CME or with respect to which it has a business relationship, it is strictly prohibited to promote, use, sell, possess, distribute, consume, produce, introduce, transfer or Transfer any type of illegal drug, intoxicating substance or drink, narcotics, psychotropics, opioids, narcotics, hallucinogens, sleeping pills, drugs or controlled medications purchased without a prescription.

Collaborators may not present themselves to carry out their activities under the influence or effects of any of the aforementioned substances, doing so may be a justified cause for the termination of their employment relationship or provision of services with the Company.

If, due to any health condition, you must take any controlled substance or medication, you must immediately inform your hierarchical superior, so that he or she, if necessary, consults with medical specialists and determines if the Collaborator is in a position to carry out their activities.

Grupo CME is committed to a safe, healthy and productive work environment for all, for which the Company, in accordance with its legal duty to avoid, as far as possible, work accidents or situations that may put others at risk Collaborators or third parties, due to the activities that we carry out, at any time may request their Collaborators to carry out analyzes and medical or chemical tests on alcohol and/or drug consumption, as well as carry out random searches in the CME Group alcohol facilities. and/or drugs.

The tests on alcohol and/or drug consumption of the Collaborators are voluntary, however, not agreeing to carry them out may generate a well-founded presumption that said Collaborator does not conduct himself in accordance with this Code of Conduct and, consequently, a loss of trust that may also be a justified and legitimate cause to terminate the employment relationship or service provision between the Company and the Collaborator.

NO TO GUNS



The possession or use of firearms or other weapons is not allowed within the facilities and work areas of Grupo CME, unless, in accordance with what is permitted by law, it is considered necessary and, where appropriate, it is counted. with the required licenses.



TRANSPARENCY IN ACCOUNTING AND FINANCE



Part of the efforts that the Company has made, since its origins, in order to prevent, detect and mitigate illicit acts, is in its strict accounting procedures, for which the Collaborators responsible for or related to banking, financial, accounting operations, fiscal or auditing of the Company must ensure that all documents, information, books and records of said operations are true, updated and always adhered to the provisions of applicable laws and regulations, internal rules of Grupo CME, as well as as provided in the FCPA.

Any payment, including travel expenses, reimbursement of expenses and contributions and legal taxes, must be properly documented and recorded in the corresponding books or files of the Company by the Collaborators responsible for the realization, documentation, administration, management and/or approval of such payments.

In order to maintain the provisions of the two previous items, Collaborators may not, for any reason, generate false invoices, nor make unusual or excessive payments or to anonymous accounts, or whose justifications or concepts are described in an inadequate, imprecise, false, misleading, incomplete or unclear.

At Grupo CME we comply with the provisions regarding transparency and information established by the **FINANCIAL REPORTING STANDARDS (NIF)**. Therefore, any payment, receipt, transaction and other banking, financial, accounting and fiscal operations must be recorded in a truthful, precise, adequate and timely manner in accordance with said NIF, for which the use of invoices, reports, false, incomplete, or misleading financial, accounting, and tax audits, entries, statements, information, or documents, as well as signing or disseminating documents that are known or presumed to be inaccurate, false, or misleading.



REGISTRATION, TRANSPARENCY AND CONTROL IN OUR ACTIVITIES



Each of the Collaborators plays a role in ensuring that their activities and information related to their functions are duly, timely and truthfully registered, documented and protected, since the foregoing will allow us all to have better control over what we do. .

Likewise, it is necessary that the reports that we render to the various areas that request it are truthful, recognizing when necessary, if we made an error or a fault for whatever reason, in order to correct it and not harm the Company. and to those related to or dependent on it.

COLLABORATE WITH THE AUTHORITIES



At Grupo CME we believe in the value, respect and dissemination of the culture of legality, which undoubtedly implies that both the Company and its Collaborators must cooperate in a timely manner with the authorities, national or foreign, and respect their powers of investigation and supervision. , for example, during tax or labor audits, security inspections, legal processes or trials, among others.

In the event that a Collaborator receives an inspection, audit, requirement, official letter, communication or summons at work or at home, related to matters of the Company, you must immediately notify the Legal Department.

Both the law and this Code of Conduct prohibit false or misleading statements in a lawsuit, complaint, investigation, audit, interview, declaration, inspection, request or presentation of documentation or information to the authorities.



TAKE CARE OF OUR WORK TOOLS



You must make correct, diligent and efficient use of the elements, tools, instruments, computer equipment, supplies, funds, resources, services, money, goods, products or materials provided by the Company for you to carry out your activities, as well as our facilities and work areas.

PROTECT THE CONFIDENTIALITY OF INFORMATION



Due to your activities as a Company Collaborator, you have knowledge or access to many types of information, which is of a **confidential nature and is the total and exclusive property of Grupo CME**.

It is necessary for the Company's Collaborators to act responsibly and legally in order to protect the privacy of the Company and others, especially with respect to information that may constitute an **industrial secret or copyright, that is, of a confidential, reserved, private, personal, relevant, sensitive and/or privileged**. We remind you that you must act with great diligence to avoid accidental disclosure of information, for example, during social conversations with friends and family or when using documents in public spaces.

As a Collaborator you will be able to use the information you know within Grupo CME, as long as it is necessary, it is directly related to your activities in the Company and you respect the framework of the laws that protect the confidentiality of the information, otherwise, it is totally prohibited. reveal, publish, disseminate, divulge, share, lend, reproduce, copy, extract, obtain, subtract, take, appropriate and/or make improper, illicit or non-professional use of said information. The responsibility to protect information is an obligation applicable even after your relationship as a Grupo CME Collaborator has ended.

The information of the Company will be accessible only to the people who need to know it, therefore, it will not be available to any Collaborator; If you have doubts about giving access to a third party (even if it is a Manager or Collaborator with management or command positions), you should immediately consult the Legal Department if access is appropriate or not.



PROPER SAFEGUARDING OF INFORMATION



Each of the Collaborators is responsible for the proper storage, safekeeping and protection of the information known within Grupo CME.

From time to time, the Company establishes policies or guidelines for the destruction of information in order to guarantee legal compliance. Collaborators must keep themselves informed of these policies or guidelines and respect what they have.

In the event that there is any reasonably foreseeable risk that a legal claim, criminal complaint, audit, administrative proceeding or other investigation may be initiated, the Legal Department must be consulted prior to the destruction of the information.

COMPUTER EQUIPMENT AND INTERNET USE



Any computer equipment, as well as all the information contained in said equipment, is the total and exclusive property of the Company.

Since the computer equipment is the property of the Company and is only provided as work tools, the Collaborator understands, acknowledges and accepts that Grupo CME has the legitimate power to access them for, among other actions: obtaining and using information, evaluate the performance and productivity of the Collaborator, investigate possible violations of this Code of Conduct, the laws or the internal regulations of Grupo CME, and especially, prevent, detect and mitigate irregular, illegal, criminal or illicit conduct that may be related to or carried out through computer equipment.

Therefore, Grupo CME, directly or through the persons it designates, without any restriction or notification, may access the computer equipment and the information it contains, in order to extract, analyze, transfer and/or use it.

Grupo CME stands out for its commitment to respecting the law, so that any of the aforementioned activities will be carried out in accordance with current laws on security and confidentiality of information and personal data, as well as on matters of preservation and protection of evidence, consistent with due control, supervision and organizational surveillance.

The Company's computer equipment and Internet networks may be used for personal matters, as long as it does not imply a decrease in the quality, productivity and volume of the activities that the Collaborator carries out in the Company, and that such use is not Contrary to this Code of Conduct, the internal rules of Grupo CME or the law.

Considering that the Collaborators have limited permission for personal use of the Internet and computer equipment, all information contained in these equipment is the property of the Company, therefore, the Collaborators should not have any expectation of privacy with respect to that information or their use of computer equipment and Internet networks.

PRUDENCE, SAFETY AND HYGIENE AT WORK



Every day we make decisions within the Company. **Prudence** is the art of deciding assertively in situations of constant change, on a day-to-day basis, at every moment of life. It consists, first of all, in knowing how to listen to others, in the first place, to those who expose us to a certain problem, since only those who listen attentively are in a position to fully understand the problem they have to solve. The imprudent, on the other hand, does not listen, because while being informed he is thinking about the supposed solution. In addition, a prudent person analyzes the advantages and disadvantages, asks for advice from the corresponding areas of the Company, before making decisions, knows how to exercise due caution before executing the decisions or instructions given to them.

Due to the nature of the work carried out in the Company, prudence is a habit that our Collaborators must cultivate and develop with special effort and care, as it will help us avoid accidents. For example, serious accidents involving nuclear plants or oil platforms have been caused by reckless conduct, commonly known as “human error”.

A fundamental part of labor prudence is that which refers to managerial work at any level of the chain of command. Being prudent, being the head of a team, means analyzing the conditions of the environment, such as the weather, the health or fatigue of the people in charge, the level of danger of a task or the possible risks it represents. These and other reasons must be weighed by the Directors and Collaborators with supervisory or command functions to decide with the greatest success and the least possible risk.

At Grupo CME we have adopted as a work philosophy professionalism based on **extreme care for details** (punctuality, perseverance, attention, precision, etc.) and on the care of finishing what we start before starting with another task.

In this sense, special care must be taken to comply with the **duty to inform** to the immediate superior on the conclusion of the entrusted work in order to optimize time and resources. In addition, in this way we will avoid risks due to human errors, due to lack of attention to detail or due to inadvertence of the possible consequences of our decisions and actions. All of which, in an industrial branch of our profile, can lead to disasters with a huge social and environmental impact.

A relevant aspect of a job well done at Grupo CME consists of paying attention to the things we do, avoiding distractions. A good piece of advice to achieve this would be this: do at all times 'what should be done' and be attentive to 'what is done', without neglecting the small details, because that is where the most serious risks and the greatest successes may lie.



The safety of our facilities and the means of transportation we use is a priority duty of the Company that is updated on a daily basis when each of its Collaborators respects full compliance with technical, legal and operational procedures, as well as the internal rules of Grupo CME.

It is the duty of each one to know, study and apply the guidelines or manuals of procedures, the protocols of operation and handling of machinery, and to notify the Directors when they perceive obsolescence of these.

The personnel in charge of the various work areas is responsible for ensuring that they remain in good **safety and hygiene conditions**. In this way we can prevent accidents and have humanly decorous and dignified spaces. In the event that a Collaborator considers that the hygiene or safety protocols are not being complied with, they must immediately contact their supervisor, the Human Resources Department or the Legal Department to inform them of the risks that are being run.

For your own safety, as well as that of other Collaborators and the Company itself, you are not allowed to take photographs, videos or audios within the CME Group facilities. Likewise, it is prohibited to publish on social networks, Internet pages or in any other medium, photographs in which the brands, logos, installations, assets, work tools and/ or any other type of property owned or held by Grupo CME appear. or to which you have had access or knowledge due to your activities for the Company.

The above prohibitions will not take place when the taking of photographs, audios and/ or videos, as well as their publication, is completely necessary and is directly related to the development of your activities.



SOCIAL RESPONSIBILITY: OUR SHARED VALUE MODEL



The economic, ethical and legal model proposed for the social responsibility programs of our Company is the so-called **SHARED VALUE MODEL**, based on which we encourage the responsible participation of all the people who, directly and indirectly, interact with our worked.

In our ordinary work we share risks with our business partners, suppliers and customers, but we can also share benefits, advice and achievements. For this reason, we support initiatives that tend to share our knowledge, experience and talent, since we do not confuse professional secrecy or protection of reserved information with the absolute closure of communications. We seek to always be open to contributing to the improvement of other companies, communities, groups, organizations and society in general. It will suffice to maintain the prudence of consulting the Legal Department within the Company in case of having doubts about this shared value policy that has characterized us from the beginning.

Shared value adds efforts between our Company and its environment (natural communities, social groups, municipalities, etc.) in such a way that there are many who, in a value chain, have left part of their effort in the provision of our services. , and they must receive part of the benefit (jobs, opening of highways and roads, economic movement, etc.)

SUSTAINABLE DEVELOPMENT AND ENVIRONMENTAL PROTECTION



CME Group, aware that natural resources are assets of the planet that should benefit humanity, is committed to adopting in its internal regulations, international programs of sustainable development in order to contribute to the improvement of the economy and well-being of the countries. and people and take firm steps in the consolidation of SUSTAINABLE DEVELOPMENT programs .

CME assumes as its own the commitments and provisions regarding environmental protection provided for in the national and, where appropriate, international legislation of the countries in which it carries out business activities.

Our Company must implement security systems that guarantee permanence as well as the ability to adapt and respect the natural environment. For this reason, all our Collaborators must include in their work programs the protection and defense of the environment item, and in the event that they suspect that any activity carried out on behalf of the Company has a negative environmental impact, they must notify the Directors immediately. or to the Legal Department so that they have the appropriate measures to deal with the situation.

In this area we must be especially careful since some contamination events could lead our Collaborators and the Company to incur criminal liability for **environmental crimes**, for which all Collaborators will carry out their activities always taking environmental care into consideration.

INTERNATIONAL TRADE RULES



It is necessary that the Associates who are directly concerned understand and comply with the laws and regulations on trade embargoes, boycotts and other restrictions involving foreign countries and businesses. Given that the laws related to these issues are very complex, approval from the Legal Department or the General Management must be obtained before agreeing to any type of commercial restriction.

FAIR COMPETITION



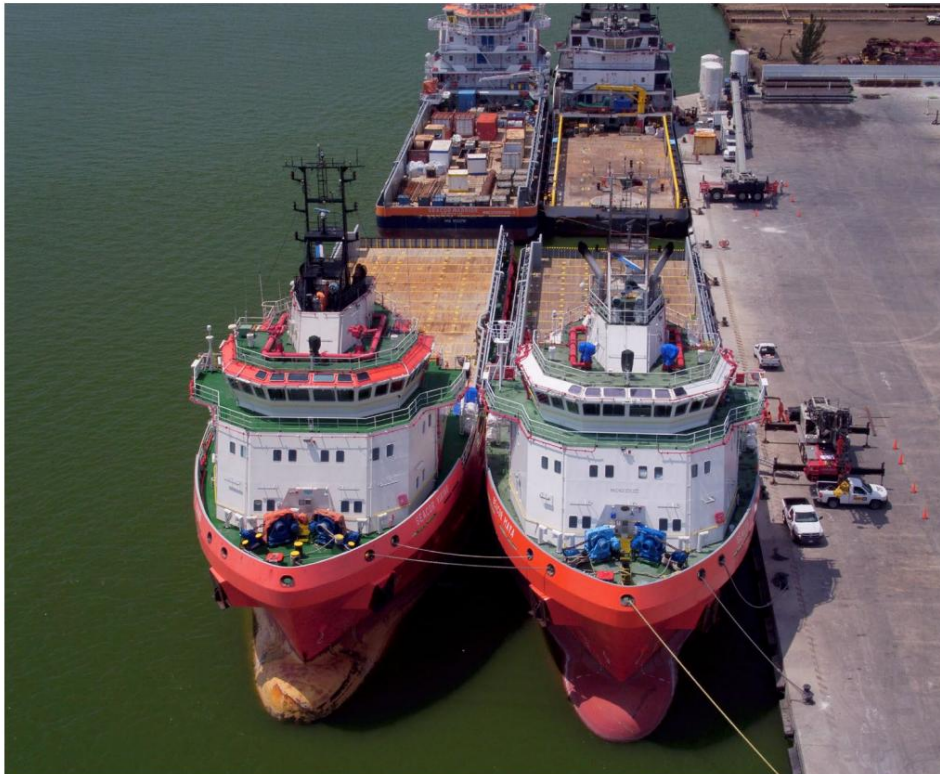
We know that the quality and prices of our services are the main reasons why our clients choose us. Therefore, we must respect the Company's competitors by carrying out our activities in accordance with ethics and competitive loyalty.

WE MUST PREVENT CRIMES



It is forbidden to plan, organize, incite, collaborate, attempt, hide, cover up or carry out conduct that is or may be criminal, whether against the Company, other Collaborators or any third party.

It is also prohibited to plan, organize, incite, collaborate, attempt, hide, cover up or carry out criminal conduct under the justification of preserving or improving our productivity, quality of services or achieving the supposed **"fulfillment of our goals"**.



WE ACT CONGRUENTLY



We take care of the corporate reputation with our own reputation.

The trust that customers, authorities, suppliers and the public place in the Company and its Collaborators is our reason for being and the value by which we can continue to develop professionally. Each of the Collaborators, being the image that represents the values and professionalism of Grupo CME, must conduct themselves in accordance with the provisions of this Code of Conduct, the internal regulations of Grupo CME and the laws in force, outside the facilities. of the Company, and even of their working hours, especially when their conduct may put the Company or other Collaborators at risk.

THE VALUE OF EVALUATION



Grupo CME, directly or through third parties, may carry out at any time, and without prior notice, audits, inspections or legitimate evaluations, both at the level of people, processes, documents, data, information, content, furniture, facilities, offices, tools of work and computer equipment, in order to evaluate the performance and productivity of the Collaborator, obtain information, investigate possible violations of the internal regulations of Grupo CME or to current laws, as well as to prevent, detect and/or mitigate the commission of any illegal or criminal conduct.



DO NOT SHUT UP: INTERNAL COMPLAINT CHANNEL



All Collaborators are obliged to report to the Company's Internal Whistleblowing Channel any situation or conduct that is or may be contrary to this Code of Conduct, the internal rules of Grupo CME and/or the laws in force that govern the Company.

All reports to the Internal Complaints Channel are anonymous, unless you voluntarily prefer to provide your name.

Reports can be made in the following ways:

Personally before the Legal Department,

Call the telephone number 5716-5167,

To the email bmagana@cicmx.com,

By means of a written letter addressed to the Legal Department of the Company with the title "Report", at the offices of Grupo CME located at Avenida Paseo de la Reforma number 2654, Floor 19, Colonia Lomas Altas, Mayor's Office Miguel Hidalgo, in Mexico City.

If you have doubts about how to proceed in situations that could lead to a breach of this Code of Conduct, the internal regulations of Grupo CME and/or the laws in force that govern the Company, you should not act or commit to anything, without before having consulted with your hierarchical superior or with the Legal Department.

Retaliation or revenge against any Collaborator who has reported, investigated and/or punished a violation of this Code of Conduct, the internal rules of Grupo CME or laws is prohibited. Grupo CME will execute the actions within its reach to protect these Collaborators.

Improper or bad faith use of the Internal Whistleblower Channel is prohibited, since making reports knowing that they are false or with the purpose of harming someone or obtaining an undue benefit, are also violations of the Code of Conduct.



BREACH OF THE CODE OF CONDUCT



Any conduct committed by a Collaborator in violation of the provisions of this Code of Conduct, the internal regulations of Grupo CME or the laws that govern the Company, is a justified reason to impose sanctions and disciplinary measures, including the legitimate termination of the legal relationship between the Collaborator and the Company, without any responsibility for Grupo CME.

Internal sanctions and disciplinary measures include, among others:

- ✓ **Verbal admonition**
- ✓ **Written warning**
- ✓ **Temporary suspension without pay**
- ✓ **Termination of the legal relationship with the Company**

In addition to the legitimate sanctions and disciplinary measures, the corresponding legal procedures and actions may be initiated.

COMMENTS, DOUBTS, COMPLAINTS AND SUGGESTIONS



If you have comments, doubts, suggestions or complaints about the content, compliance or interpretation of the Code of Conduct, internal rules of Grupo CME or laws that govern us, it is your obligation to let them know immediately, either to your hierarchical superior or to the Legal Department. In the event that the doubt, suggestion or complaint comes from a Collaborator of the Legal Department, you must consult it with the General Director of the Company.

This Code of Conduct is a general guide on our values and basic principles of action, and cannot provide an answer for each specific situation.

For this reason, in addition to the fact that you can always ask for advice from your hierarchical superior or the Legal Department, we offer you a series of questions that you should ask yourself in the event of any dilemmas you have about whether any conduct or situation is contrary to our Code of Conduct, internal rules of Grupo CME or laws.

These questions are written in the first person, but they also apply to third-party actions.

Am I acting in accordance with the company values?	If the answer is negative, ask your superior or the Legal Department for advice.
Is what I am doing ethical and in accordance with our Code of Conduct and internal regulations of Grupo CME?	If the answer is negative, ask your superior or the Legal Department for advice.
Is what I'm doing legal?	If the answer is negative, ask your superior or the Legal Department for advice.
If this were to become public knowledge, Would it affect my prestige and/or that of the Company?	If the answer is yes, ask your superior or the Legal Department for advice

“ This Code of Conduct is a general guide on our values and basic principles of action”.

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