



POLICY

Code of Ethics and Conduct

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Message from our CEO

Kueski was created with the firm conviction of making people's financial lives easier in Mexico, undoubtedly a noble objective with which we seek to generate a positive impact on society by giving access to innovative financial services to Mexicans.

We are convinced that such a noble objective must be accompanied by equally noble behavior: **honorable**, distancing our actions from the famous sayings: "The end justifies the means" and "He who does not compromise does not advance".

That is why, as a company, we work from a place of trust and ethics, challenging the status quo of financial services, but acting from our firm conviction: "**Uprightness of intention and integrity**". We should also heed the saying, "Don't do good things that look bad."

This is reflected in our compliance with the highest ethical and conduct standards both within and outside the organization, as well as in our zero tolerance at Kueski for acts that violate our standards of integrity.

We invite you to **embrace our culture** and to let our Code of Ethics and Conduct serve as a guide toward our goals, because we are convinced that our greatest achievement will not simply be professional success, but rather having set an example that we can be both successful and honorable. That should be our final legacy to the world.

Adalberto Flores Ochoa
CEO

1. Objective and Scope

This Code of Ethics and Conduct (hereinafter “Code” or “Code of Conduct”) serves as a principle-based guide that helps inform, guide, and direct our activities and processes, supporting our behavior to be consistent with our values during decision-making and establishing the expected behavior of the Kueskis within and outside the organization regarding ethics and compliance, which is everyone's responsibility.

This code aims to give Kueskis the necessary tools to act without reservation and with integrity, as this is fundamental to our culture and to achieve our goals.

“Integrity is doing the right thing even when no one is watching...”

The content of this Code is applicable to all directors, collaborators (internal and external) of KUESKI S.A.P.I de C.V. SOFOM, E.N.R. and KUESKI TECH S.A.P.I de C.V. (hereinafter, Kueski), as well as to the board of directors and all interested parties related to the company, in the performance of their practices and activities.

2. Mission, Vision and Values

Our mission is to make life easier for people in Mexico financially, and our vision is to help Mexican consumers live more prosperously and experience their personal finances with more excitement and less anxiety.

What distinguishes Kueski as a company is our commitment to our fundamental values, which gave rise to and purpose for Kueski, always seeking to fulfill our objectives with the highest ethical standards.

Our values are

First and foremost, the mission comes first.

Making people's financial lives easier in Mexico

We adapted the system to generate impact: We are loyal to our mission, not to our current processes, structures, tools, or beliefs. As Kueski grows, our way of working must also evolve. We continually improve our products, systems, teams, and ways of working to better serve our customers and fulfill our mission.

We measure our contribution by the multiplier effect we generate, not by the hours we work, the activity we perform, or the volume we produce. The most valuable work transcends the individual: it's a system, an agent, a platform, a process, or a decision that enables many people to generate more value with less effort.

As AI takes over repetitive work, our value shifts towards judgment, design, and building systems that multiply the impact of others.

Past success does not guarantee future success. We question our assumptions, redesign what no longer works, and adapt before change forces us to.

We embrace new technologies, ideas, and approaches when they enable us to create more value, move faster, or better serve our customers. We are willing to automate, simplify, redesign, or eliminate work when it advances our mission.

Instead of asking ourselves, "How much did I do?", we ask ourselves, "How much will what I built continue to do after I'm no longer involved?"

Anti-patterns

- Saying, "That's how we've always done it."
- Defend a process simply because we created it.
- Prioritizing stability over customer value.
- Confusing tradition with wisdom.
- Assuming that past success means change is no longer necessary.
- Measure effort, hours, activity, or volume instead of results.
- Doing repetitive work manually when we could build something that does it for us.
- Confusing being busy with generating value.
- Accumulating work instead of building the system that eliminates the need to do it.
- Adding complexity when a simpler solution would suffice.

"Give me a fulcrum and a lever long enough, and I will move the world."
— Archimedes

Missionaries, not mercenaries:We are leaders passionate about Kueski's mission, culture, and legacy. While we recognize the importance of money, what truly drives us is contributing to the fulfillment of our mission.

"If you don't enjoy what you do, I urge you to find another job. Remember the Scottish proverb: 'Be happy while you live, for you will be dead for a long time.'"

— David Ogilvy

"Choose a job you love, and you will never have to work a day in your life."

Anonymous

Rectitude of intention and integrity:We act with the best intentions and with high standards of integrity, aligned with our values, the laws and the common good of our employees, customers and society.

"We look for intelligence, initiative, and integrity. And if someone lacks integrity, the other two qualities will destroy you; because if you're going to hire someone without integrity, they'd better be lazy and unintelligent."

— Warren Buffett

Customer value:Customer satisfaction is at the heart of our mission. We first consider how to generate the greatest possible value for our customers, and only then how to monetize it. We choose simpler solutions for the customer, even if it means more work for us.

We never pass our problems on to our customers, even if solving them requires more time, effort, or is inconvenient.

Resilience: We set very ambitious goals and work diligently to achieve them. When we fail, we learn from our mistakes and try again, without compromising quality, integrity, or our mission.

"It's not that I'm so smart; I just spend more time solving problems."

— Albert Einstein

"A winner is simply a loser who tried one more time."

— George M. Moore Jr.

We think like owners:We act like owners by focusing on the highest value opportunities, making the right trade-offs, and moving the business forward without waiting for someone to tell us what to do.

"I'm so excited to be here. I believe deeply in this restaurant and I love it with all my heart. I'm also very clear about what my job is: to do what's best for the restaurant, not necessarily what's best for any of you. Often, it's both." coincide. "But the only way to truly take care of everyone is by always putting the restaurant first." — Will Guidara, Unreasonable Hospitality.

Speed

Decisions are made at the competent level closest to the problem:As Kueski grows, speed can no longer depend on a small group of leaders. We empower decision-making to those closest to the problem. Leaders create clarity and context, not bottlenecks.

Anti-patterns:

- Waiting for unnecessary approvals.
- Escalate decisions that we can make ourselves.
- Use hierarchy instead of criteria

Progress over perfection:We prefer to learn quickly rather than be right in theory. Perfect plans rarely survive contact with reality. We validate our assumptions from the start, launch intentionally, and improve based on evidence.

Anti-patterns:

- Falling into endless analysis.
- Seek absolute certainty before acting.
- Delaying customer value in pursuit of perfection.

Clarity of responsibility:Every important problem needs someone to be responsible. Progress stalls when no one is clear on who's in charge. If something is important, someone has to lead it, drive it forward, and make sure it's completed.

Anti-patterns:

- "Someone should do this."
- Committees without clear responsibility.
- Problems that bounce between teams without being resolved.

Alignment before bureaucracy:We resolve coordination through clarity, not through processes. As organizations grow, complexity naturally increases. Our first impulse is to improve context, communication, and alignment, not to add more layers, approvals, or meetings. We have a responsibility to respectfully question the solutions being proposed. When we disagree, we raise our hands and express our point of view; we don't remain silent to maintain harmony. Once the decision-maker has made their decision, we disagree and compromise. We are 150% committed to moving forward together and we never say, "I told you so."

Anti-patterns:

- Create a process or policy to solve each problem.
- Replacing decisions with meetings.
- Add controls at the expense of speed.

We are a rock band

We avoid individualistic rockstars.

Talent density: We achieve extraordinary results by surrounding ourselves with extraordinary people.

We actively increase talent density at Kueski by hiring exceptional people, developing those with potential, giving honest feedback, and promptly addressing performance issues.

We do not tolerate mediocrity because extraordinary people deserve to work alongside other extraordinary people.

A high density of talent is a sign of respect for our mission, our clients, and each other.

Anti-patterns

- Avoid difficult feedback conversations.
- To tolerate consistently poor performance.
- Lower the level of expectation to avoid uncomfortable conversations.
- Keeping someone in a role where they cannot succeed.
- Hiring for convenience instead of seeking excellence.

Teams, not individual stars: We're a rock band where every member contributes to each song. Each person's contribution may vary, but what truly matters is the final result. We're not concerned with who gets the credit. We don't let our egos interfere with teamwork.

"The greatest competitive advantage a company can achieve is organizational health. However, most leaders ignore it, even though it is simple, free, and available to anyone who wants to develop it."

— Patrick Lencioni, *The Advantage*

Anti-office politics: Leaders drive initiatives that benefit Kueski's mission, even when those initiatives benefit someone else or another department and don't directly benefit them. Our team is Kueski.

Vulnerability in a secure environment: We create spaces where we can let our guard down and be ourselves.

We acknowledge our mistakes and areas for improvement, we ask for help in a timely manner, and we practice self-criticism.

"Psychological safety isn't about being nice. It's about giving honest feedback, openly admitting mistakes, and learning from each other."

— Amy Edmondson, *The Fearless Organization*

Leadership through influence: At Kueski, leadership does not depend on a position, people in charge, or a hierarchical level.

Leading means influencing others by taking the time to explain why, provide context, and

genuinely listen.

"No matter what position you hold; if no one asks you for advice, you're not a leader..."

No matter what position you hold, if people seek your advice, you are a leader.

"Character is shown in how you treat those who can do nothing for you."

Anonymous

Step up, step down: No task is above or below us.

We enjoy challenges and, at the same time, we recognize when it's time to make room for someone who is better prepared to take on a responsibility.

Diversity: We seek unique perspectives and promote diversity in all its forms: ideas, experiences, beliefs, and ways of thinking.

This way we enrich our decisions with the greatest possible diversity of viewpoints.

"One of the pieces of advice I give most often is that there are many different kinds of talent. Early in my career, I thought it all came down to IQ or engineering ability... but I was completely wrong. The right combination of skills is what really matters. That mix of talents is what surprised me the most."

— Bill Gates

Find the way to do it: We always look for the how.

We simplify, reduce complexity, eliminate the unnecessary, and make the best solution the easiest for our customers.

Reliable musicians: We fulfill our commitments with speed, consistency, and quality.

We make the risks visible from the beginning, we finish what really matters, and we take responsibility for both the problems and the results.

High-performance teams: We hold each other to a high standard and work with responsibility, honesty, and outstanding execution.

Because we care about the team's success, we give direct feedback, we solve problems head-on, and we help each other raise the bar.

The Geeks' revenge has arrived

We embrace ignorance: Leaders are driven by an insatiable curiosity. They ask more questions than they have answers to.

"Judge a person by their questions, rather than their answers." — Voltaire

"The more I learn, the more I realize how little I know." — Socrates

Intellectual humility: We accept the best ideas, no matter where they come from, even when they contradict our experience or the way we've always done things.

"If a year goes by without you destroying one of your favorite ideas, it was probably a wasted year." — Charlie Munger

"The difficulty lies not so much in developing new ideas, but in escaping from old ones." — John Maynard Keynes

Specific knowledge: *"Specific knowledge is that which no one can train you for. If society can train you, it can also train someone else to replace you. Specific knowledge develops by following your genuine curiosity and passion, not simply what is fashionable. Building specific knowledge will feel like play to you, even if it seems like work to others."* Naval Ravikant

Laugh at yourself: A leader doesn't take himself too seriously.

We enjoy what we do, we learn to laugh at ourselves and we show ourselves as we truly are, no matter how peculiar we may seem.

"Develop your eccentricities while you're young. That way, when you're older, people won't think you've lost your mind." — David Ogilvy

Embrace failure: Failure is part of the path to success. We don't seek to avoid it; we seek to learn from it.

"People think that success and failure are opposites, that the more successful I am, the less failure I experience. The reality is that failure is interwoven with success. The right question isn't, 'How do I avoid failing?', but rather: 'How can I fail in a way that helps me develop the skills and mindset needed to succeed in the long run?'" — Dr. Gio Valiante

"Many of life's advantages come from being willing to look like a failure in the short term." — Shane Parrish

"Many of life's failures are people who didn't realize how close they were to success when they decided to give up." — Thomas Edison

We seek simplicity: Simplicity, combined with quality, is always worth more than quantity.

Less is more.

"Simplicity can be harder than complexity. You have to work hard to organize your thinking and make it simple. But it's worth it, because once you achieve that, you can move mountains." — Steve Jobs

Mastery in what we do: We care deeply about quality, and we understand that quality also includes delivering on time, creating useful solutions, and making an impact.

We don't expect perfection when a valuable, high-quality, and timely delivered solution generates greater benefits for our customers.

"Your work will fill a large part of your life, and the only way to feel truly satisfied is to do what you believe is great work." — Steve Jobs

Kueski is our legacy: We think about the long-term impact.

We apply second-order thinking: a way of thinking that goes beyond immediate reactions and short-term gains. We seek to anticipate the consequences of our decisions and choose what will generate value not only today, but also in the months and years to come.

Like a grandmaster of chess, we don't just think about the next move. We think about how each decision influences the entire game, anticipating both our strategy and the possible responses of the environment.

3. Human rights

At Kueski, we work with camaraderie and respect for the rules and for each other. We work as a team, respecting the diversity of ideas and people, allowing everyone to contribute to our sound. We promote compliance with human and labor rights, and we are committed to applying standards and best practices regarding employment conditions, health, and safety for all Kueskis and to:

Carry out actions that **promote a work environment free of harassment, intimidation, prejudice or any kind of discrimination based on ethnic or national origin, gender, age, disabilities, social status, health conditions, religion, opinions, sexual preferences, marital status or any other that violates human dignity** and is intended to nullify or undermine the rights and freedoms of people.

Guarantee inclusive, equitable, dignified and safe working conditions.

Promote the free expression of creed, sexual inclination and political identification.

Have zero tolerance for any physical, moral, work and psychological aggression.

Guarantee the rights of privacy and data protection of all people.

The above is only possible with your support, that's why **we're counting on you!** All Kueskis, regardless of our role, are committed to evaluating, providing feedback, correcting, and reporting deficiencies or failures observed in the practice of our different activities, as well as any situation that may jeopardize the well-being of others or our company.

That's why we understand and confirm that any violation of the above guidelines may be subject to sanction or even dismissal, in accordance with this Code and the Internal Work Regulations.

4. Diversity, Equity and Inclusion

At Kueski, our culture embraces, promotes, and encourages unique perspectives; diversity of thought, beliefs, preferences, races, cultures, characteristics, abilities, nationalities, ages, gender identity or expression, sexual orientation, locations and religions, so that the decisions we make are enriching; that is why we have a Diversity, Equity and Inclusion Council ("DEI"), which acts as an authentic filter to evaluate policies, procedures and programs framed within the DEI.

At Kueski we recognize and promote individuality and respect for people. We focus on **avoiding and preventing** abuse of power, discrimination, exploitation, harassment in any form (including sexual harassment), racism, aggression in any form, psychological abuse, injustice, and any other acts that make our colleagues, clients, suppliers, and other stakeholders feel inferior or excluded. Every person associated with the company will be treated with equality, respect, and fairness in daily operations, based on this Code, the Compliance Directive, the Internal Work Regulations, and applicable local and international regulations¹.

Therefore, all Kueskis commit to **not carrying out or promoting** any of the aforementioned actions by any technological means such as video, video calls, messaging applications, or in person, nor in any of their forms of expression, whether in decision-making, attitudes, omissions, gestures, or other means. Doing otherwise will be considered a conduct or behavior subject to a sanction classified as serious in accordance with the provisions of Article 73 of the Internal Work Regulations and this Code.

Our Diversity, Equity, and Inclusion Council at Kueski was created with the purpose of "being the authentic filter for evaluating policies, procedures, and programs" and will be made up of a multidisciplinary team in charge of promoting a culture of diversity, equity, and inclusion

¹See, for example, the Federal Law to Prevent and Eliminate Discrimination or General Law for the Inclusion of Persons with Disabilities, as well as the Law for the recognition and care of LGBTTIQ+ people in Mexico City.

through national and international best practices, which will allow creating a safe work environment for everyone, where people can be who they really are. This Council will have a six-month rotation to guarantee the diversity of opinions in inclusion projects at Kueski.

Objective of the DEI Council in Kueski

To create and promote favorable conditions through policies, programs and a culture that allows diversity, equity and inclusion in any area (thought, beliefs and preferences) so that the decisions and guidelines established in Kueski are enriched with the greatest number of viewpoints possible.

The importance of having a body that promotes these initiatives serves as a basis for fostering good practices aligned with the culture we seek within Kueski, our vision, mission and values.

5. AML/CFT and Fraud

Kueskis interact with clients, authorities, and public or private institutions with **integrity**, in a way that is **lawful, ethical, respectful, and aligned manner with legal provisions**² for the prevention of any crime of Money Laundering and Terrorist Financing.

Part of our responsibility is to inform the AML/CFT team when we identify a situation suspected of being related to AML/CFT involving customers, suppliers, third parties or partners, in accordance with the Compliance Manual on this matter.

Our stance on fraud is one of zero tolerance, not only towards fraud itself, but also towards any type of breach of trust; therefore, any fraud, error or intentional omission, false statement or any attempt to deceive or unduly influence with respect to general or financial information of Kueski that is detrimental to internal controls, laws or regulations will be subject to sanctions or even dismissal under the terms established in the Code and/or the Internal Work Regulations.

They will also not use company funds or cards to cover actions that are not part of their professional activity.

²General Provisions PLD, Foreign and Corrupt Practices Act (FCPA), The UK Bribery Act, National Anti-Corruption System, NOM 035, Federal Labor Law, Law for the inclusion of LGBTTTIQ+ people.

At Kueski, we act as owners, so if we witness or become aware of any act related to the above, it is our responsibility to report it through our reporting channel - DIME

6. Corruption and Bribery

Kueskis do not give, pay, or receive bribes. We do not offer money or any object of value, gift, incentive, stimulus, or prizes to public officials, customers, suppliers, collaborators, community agents, competitors, or stakeholders—neither directly nor through third parties—that gives us an unfair advantage, since we have **zero tolerance for acts of corruption or bribery** and we are committed to implementing the best anti-corruption and anti-bribery practices³ included in detail in the Compliance Policy.

Any relationship with public administrations must be previously authorized by Kueski through the Compliance team based on the Compliance Directive. Kueskis do not accept gifts of any kind from a third party, especially if it includes cash or its equivalent in prepaid cards.

Gifts valued at less than \$1,500.00 Mexican pesos are excepted from the above rule if they are proportionate and reasonable according to local practice, transparent, given for legitimate, socially acceptable and sporadic interests. If the above amount is exceeded, the gift will be made available to Kueski for raffles or internal contests.

All gifts and invitations whose value exceeds \$500.00 Mexican pesos must be reported to the Compliance team through the Service Desk in the Legal & Compliance section in order to verify the reason why it was granted and to approve its acceptance or rejection, as the case may be.

Kueskis will avoid obtaining any type of benefit in tax, legal, or public matters. In the event that any Kueski is accused of any crime related to corruption or bribery, Kueski undertakes to investigate the facts to determine what legal support can be provided to the Kueski in question.

Receiving a gift or any invitation from a third party does not constitute a breach of this Code; however, **failing to report it promptly** could be grounds for a sanction or even dismissal under the terms established in the Code itself and/or the Internal Work Regulations.

³National anti-corruption system, Anti-bribery management system, ISO 37301 - Compliance management system

7. Conflict of interest

The best way to achieve our goals is through impartial, objective, and conflict-free action, as this will allow us to protect Kueski's interests in the long term.

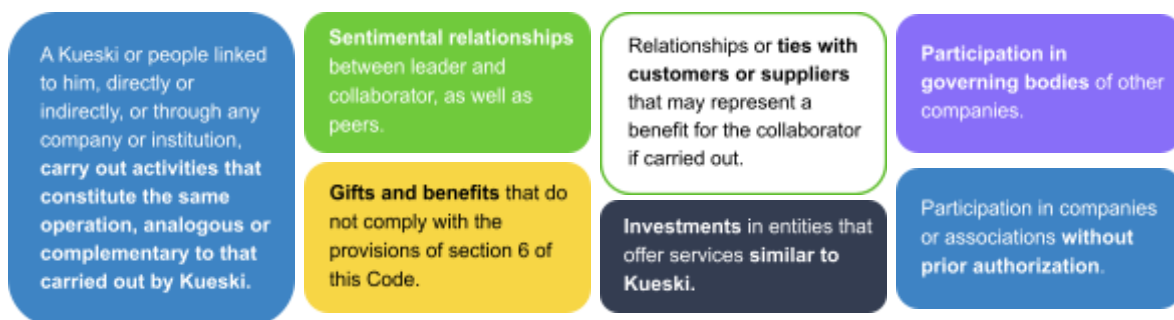
Conflicts of interest occur when Kueskis find themselves in a situation that may lead them to make decisions motivated by interests other than those of the company.

Kueskis must avoid and report any situations that could create a conflict of interest between our personal interests and those of Kueski. We will also refrain from intervening in or influencing decision-making, directly or indirectly, where we or a related third party have a personal interest. Likewise, we must not exploit our position at Kueski to obtain personal or financial advantages or business opportunities for ourselves.

No Kueski employee may provide services as a consultant, advisor, director, employee, or counsel to another competing company, except for services that may be provided at Kueski's request with authorization from the Ethics and Compliance Committee.

To avoid any breach of our Code, any situation where you are involved in or witness any conflict of interest that may compromise the necessary objectivity or professionalism based on our functions at Kueski, it must be reported in a timely manner through the Service Desk in the Legal & Compliance - Ethics section.

Some potential conflict situations that require submitting a report are:



Having a real, potential, or apparent conflict of interest does not constitute a breach of this Code; however, **failing to report it promptly** could be grounds for a sanction or even dismissal under the terms established in the Code itself or the RIT, as applicable.

8. Social and environmental commitment

Kueski's social responsibility, understood as its social and environmental commitment in the development of its activities and for the benefit of all its stakeholders, is part of its Code of Ethics and Conduct. This Code sets the guidelines for any activity carried out with the company's internal or external clients, and with any other stakeholders with whom it has a relationship.

Kueski seeks to reduce its environmental impact through initiatives such as remote work, providing financial services digitally, and developing administrative processes through technology, aiming to eliminate the use of paper.

9. Marketing and communication media

Following our value of putting the customer at the center of our mission with integrity, we design campaign strategies and promotions in the offering of our products in a clear manner, always avoiding providing false, misleading, or confusing information to customers and parties related to the company, which also allows us to fulfill the legal guidelines/rules to which we are subject.

Kueski employees will also avoid spreading malicious or false information about the company's competitors.

Kueski has zero tolerance and will be subject to sanctions or even dismissal when a collaborator breaks the limits of trust, disrespects or discloses information about customers, products or any person related to Kueski.

10. Social media and brand usage

At Kueski we believe in open communication, all employees are ambassadors of the Kueski brand and we live the culture to the fullest, both inside and outside the company, so we are committed to protecting the reputation, security and privacy of information.

To achieve a safer Kueski, **we do not share information on our personal social networks or the internet that violates controls, legal, financial, operational matters, or information about our clients, suppliers, processes, policies, and internal agreements**, including anything labeled as confidential, restricted or internal information, as we are putting Kueski's security at risk.

That is why we must do it responsibly and with good intentions, avoiding at all times violating trade secrets; remember that together we build the company's reputation.

Just like in our work environment, we at Kueski have zero tolerance for using language that discriminates, intimidates, threatens, or violates human rights in any way when sharing opinions on personal social media related to Kueski.

11. Information care, computer security and use of resources and assets

All Kueskis respect the privacy and confidentiality of the information of our customers, employees, suppliers, and any third parties with whom we have a relationship, always complying with all applicable rules, laws, and policies. Therefore, we collect and use your information only if we have a legitimate reason to do so and access it only when necessary in accordance with the Law on the Protection of Personal Data Held by Private Parties and its regulations.

We are also committed to complying with the policies, processes, and procedures of **Information Security, Data Protection Policies and Information Asset Usage Policy** avoiding using for our own benefit any data, information or document obtained during the exercise of our professional activities.

Kueskis use company resources and assets efficiently and do not misuse them. Under no circumstances will the equipment be used to install or download programs, applications, or content whose use is illegal, that violates company rules, or that could harm its reputation.

Kueskis are advocates for security, complying with the timely reporting to the Information Security area through the Service Desk or email security@kueski.com of any incident we detect related to the loss of confidentiality or integrity of information or to the protection of personal data, as well as to what is established in the RIT.

12. Economic competition

Kueski competes fairly in the market and does not tolerate any deceptive, fraudulent, or malicious conduct. When Kueski seeks commercial or market information, we do so without violating the regulations that protect it.

Kueski rejects and has zero tolerance for any practices that deviate from fair competition. Therefore, Kueski does not engage in, negotiate, participate in, or promote any act that tends to enter into any agreement with competitors who carry out or intend to carry out absolute monopolistic practices on behalf of Kueski. These are understood as agreements

between competitors to determine market conditions such as: (i) fixing prices; (ii) restricting supply; (iii) segmenting and dividing markets; and/or (iv) coordinating bids in tenders.

It is important to know that monopolistic activities are not permitted at Kueski, and engaging in them will be considered a serious offense under Article 69 of the Internal Work Regulations.

Remember that if you witness, carry out, or are a victim of an action that may suggest an absolute monopolistic practice, you should report it through the Anonymous Reporting Channel **DIME**. If you have any doubts about whether a certain conduct is considered an absolute monopoly practice, you can consult with the Legal and Compliance team by sending an email to legal@kueski.com.

13. Intellectual and industrial property

At Kueski, we follow the guidelines for the protection of intellectual and industrial property (both our own and third parties'). Therefore, we as Kueskis commit to **respecting our own and third-party intellectual property rights**, including, but not limited to, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction rights, trade secrets, and rights to specialized technical knowledge.

Kueski is responsible for the originality of its own designs, developments, and business model, as well as the uses its suppliers make of the brand. Kueskis must not use third-party intellectual property, including but not limited to their works, creations, designs or distinctive signs, without written authorization for the use and/or exploitation of the corresponding rights and/or licenses.

The Kueskis reject information about competitors obtained illegally or in violation of the confidentiality maintained by its legitimate owners.

14. Donations

Kueskis do not make donations of any kind to political parties, unions, organizations or associations to avoid any political influence or activity that could unduly benefit us or Kueski.

Donations made in Kueski's name must be approved by the Ethics and Compliance Committee and must be in kind only. These will be documented in Kueski's official media to promote transparency and social welfare.

15. Reporting Channel - “DIME”

We have a reporting channel available called “DIME”. This data is hosted by a trusted third-party provider that adheres to the highest information security standards. Therefore, any external party or Kueski employee who wishes to report an act or activity that violates this Code may be investigated impartially and objectively by an internal or external multidisciplinary team, as the case may require.

It is our responsibility to **report and denounce any suspicious activity**, as failing to do so makes one an accomplice to or guilty of a violation of this Code, regulations, and policies, as well as acts of corruption, bribery, money laundering, and other illicit acts. *Remember that by having the courage to act like owners, we protect our culture!*

16. Code Compliance

All Kueskis commit to complying with the guidelines established in this Code, as well as the Policies and Procedures linked to it. We also commit to promoting the application of this Code and to reporting in good faith any non-compliance, conduct, or behavior we observe, commit, or witness through our anonymous reporting channel “DIME”. Kueski makes this information available to us, knowing that failure to comply may result in sanctions or even dismissal, depending on the severity of the infraction. In the event of any discrepancy between this Code and the Internal Work Regulations, the latter shall prevail and is subject to approval by the Ethics and Compliance Committee.

17. From the Ethics and Compliance Committee

At Kueski, we have an Ethics and Compliance Committee comprised of a multidisciplinary team responsible for promoting best practices and expected behaviors that mitigate risks both within and outside the company, as well as addressing and resolving disputes involving violations of this code, the Internal Regulations, or any activity that goes against Kueski's culture and values. All information is treated with strict confidentiality, regardless of the impact or complexity of each case, in accordance with the commitments made by all members of the committee.

18. Advertising of the Code

This Code will be communicated to all employees or related third parties to whom it applies and will remain posted in [kDocs](#).

Likewise, all the Kueskis agree to attend the training necessary for understanding this document, accrediting them with at least 70% approval.

19. Confidentiality

We as Kueskis confirm our commitment to confidentiality through the agreement we signed during our onboarding, where we also commit to the care, protection, and non-disclosure of any type of information, even after our contractual relationship has ended.

Remember! Any complaints you file, the related investigations, and their results will be handled with strict confidentiality and discussed only with the necessary individuals, depending on the circumstances of each case. Therefore, no information can be disclosed that could put you, Kueski, or any related person at risk.

20. Authorizations

Done	Revised	Approved
Eduardo Pinedo Velarde Manager of Internal Control	Yazmín Cardeña Compliance Associate	Carlos Sánchez Almada SVP Of Legal, Security, Compliance & Internal Control Sung Hae Kim Chief People Officer

21. Change control

Date	Revision	Modified by	Description / Modifications
20/12/2018	00	People Success - Compensation & Benefits.	Initial Edition
20/06/2020	01	People Success - Compensation & Benefits.	Two paragraphs were added to section 12, regarding working from home.
07/11/2022	02	Compliance	General Modification
30/01/2023	03	Compliance	The section on economic competition was developed. The section on the use of



Date	Revision	Modified by	Description / Modifications
			resources and assets was combined with information security and cybersecurity. A reference to the ethics hotline, DIME, was added. The CEyC training approval rate was standardized to 70%.
04/08/2023	04	Compliance	The gift allowance is updated to \$1,500 MXN.
17/06/2024	05	Compliance	The terms sexual orientation, gender identity, and gender expression are included, as well as the DEI council's objectives regarding diversity, equity, and inclusion.
06/12/2024	06	Compliance	The values were updated based on what is described in the document Day #1: Kueski Values.
08/04/2025	07	Compliance - Internal Control	Guidelines for reporting gifts and invitations have been modified. Gifts and invitations (received or to be given) with a value greater than \$500.00 Mexican pesos must be reported to Compliance.
11/11/2025	08	Internal Control	The value " Think long-term " was updated and the company's mission and vision were also included.
30/09/2026	09	Internal Control	The values were restructured into four main ones: "The mission comes first", "Speed", "We are a rock band" and "The revenge of the Geeks has arrived". The value for " Speed " was added in its entirety, which is completely new. The descriptions, quotes, philosophies, and operational anti-patterns were integrated.