



CODE OF  
ETHICS AND  
CONDUCT



GRUPO BAL

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CONDUCT

# MESSAGE FROM THE PRESIDENT



Dear employees:

Through this document, we share the ethical values and conduct principles that constitute the fundamental elements for decision-making and management of *Grupo BAL*'s activities.

The values and principles contained in this Code have enabled us to build our reputation as good corporate citizens, because we who abide by the law and the sound principles of honesty, respect for others, transparency, consistency, and sustainability. This Code has enabled us to respond appropriately to our fiduciary responsibilities and has been a decisive factor in leading our efforts to achieve social recognition; our customers appreciate the reliability of our products and services, as well as our companies' testimony of integrity in their conduct.

In sharing these values and conduct principles with you, I invite you to also make them your own, so they become your everyday tools for your professional development. This genuine eagerness to preserve the proper conduct and good performance of our companies in a cordial, trusting and respectful environment will allow you, in better conditions, to achieve your professional fulfillment and will make you feel even prouder of collaborating at *Grupo BAL*. Our efforts and our commitment to values and proper conduct will also contribute to building a better society in our beloved Mexico.

Alberto Baillères  
President of *Grupo BAL*

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# I. VALIDITY AND OBJECTIVES

Our Code of Ethics and Conduct defines the ethical standards that guide the conduct of all of us who are part of the *Grupo BAL* companies, it is mandatory for all employees and its validity is indefinite.

The Code of Ethics and Conduct is based on the principles that distinguish us as an organization, on what we do and how we do it, on our organizational philosophy and our values, and brings together the ethical conduct of all who are part of *Grupo BAL*, with the following objectives:

- To have a frame of reference for the activities we carry out.
- To regulate our behavior at work, with other people and the communities we interact with.
- To establish the guidelines that should govern our conduct when we relate to stakeholders, such as authorities or interested third parties.
- To complement the internal and external regulations in force.
- To disseminate the whistleblower hotline to report breaches to this Code.
- To establish the corresponding disciplinary measures for those who deviate from the provisions herein.



## ETHICAL BUSINESS CONDUCT

*Grupo BAL* companies maintain a customer-centric approach, as well as a commitment to excellence and innovation.

All our employees comply with and monitor the compliance according to the legislation that regulates our activities and those of the companies for which we work for.

# II. ORGANIZATIONAL PHILOSOPHY

## CORPORATE

### VALUES

The reputation of *Grupo BAL* companies has been forged and remains constant thanks to the principles lived by our employees inside and outside the workplace; it is our individual commitment to apply the following values:

#### INTEGRITY

To always act with rectitude under the principles of honesty, truth, justice, and transparency; to be congruent between what we think, we say, and we do, as well as to take individually, freely, and consciously, the commitment to develop the assigned tasks and the responsibility to fulfill them with care and promptness, to achieve the quality and excellence that distinguish us.

#### LOYALTY

To always fulfill, even in adverse conditions, our commitments to our shareholders, the Group's companies, our clients, colleagues, suppliers, authorities, society and even to ourselves. Furthermore, to look after the Group's companies' assets by safeguarding the assets entrusted to us, by keeping confidential the information we handle and by protecting the intellectual property rights and industrial secrets of *Grupo BAL* companies.

#### RESPECT

To recognize the inherent value of every person and to treat them impartially, without distinction, to preserve their dignity and personal integrity, avoiding any conduct that may be offensive. As a fundamental part of this principle, we value the opinions and beliefs of all the people; therefore, we are willing to listen to ideas that differ from our own, to recognize their value and to accept people's right to disagree. In addition, we are deeply committed to abide by the law and its spirit, and to protect the environment.

### III. SCOPE AND ENFORCEABILITY

All members of the organization, regardless of the legal entity for which we work for, the location or employment relationship in which we are, the activities we perform or the position we hold, are obliged to adhere our conduct and behavior to the principles and values contained in this Code of Ethics and Conduct; therefore, it applies to directors, managers, permanent and temporary staff, interns and in general to all staff, who will be referred to collectively with the term "employees".



To make this explicit, all employees must sign a commitment letter annually and when joining the company, in which we commit to accept and follow the rules established herein.

Similarly, this Code is applicable to suppliers, business partners, distributors, agents acting on behalf of *Grupo BAL* companies and other third parties with whom they have a relationship, so they are expected to share the values of *Grupo BAL* and act in accordance with the guidelines defined therein.

Audit and Compliance are responsible for verifying that our relationship with customers, suppliers, stakeholders, and other employees adhere to the guidelines of this Code.

The Ethics Committee, a body made up of executives from the Group's companies, is responsible for supervising and monitoring the compliance to the Integrity Policy and the Code of Ethics and Conduct, as well as investigating complaints and applying disciplinary measures when misconduct occurs.

This Code of Ethics and Conduct, as well as the policies to which it relates to, are available on our website and the internal portal to facilitate its access and ensure its dissemination.

## IV. REGULATION

To ensure that our activities are being carried out within a legal framework that promotes the highest standards of corporate, operational, and social responsibility, *Grupo BAL* companies have a system of internal regulation that is part of our corporate governance, to which this Code is complementary and should be considered as a frame of reference for our actions.

This system is integrated by policies and procedures that each company has designed and that all employees must comply with; and by specific procedures, management guidelines, operational plans and manuals that have been defined for the companies' workers. Employees must be familiar with their applicable regulation.





# V. EMPLOYEE BEHAVIOR

As collaborators we contribute with our talent and best effort to the achievement of the organizational objectives, living the values and complying with the policies and procedures.



## OBLIGATIONS OF EMPLOYEES

- To know what we do and how we do it.
- To seek permanently the value generation and to contribute to the achievement of the objectives and goals of the Group's companies by practicing our values, complying with our policies and procedures, as well as with the provisions of this Code.
- To fulfill our work and commitments in a consistent, honest, and responsible manner.
- To acquire the commitment of our own training and development.
- To work as a team and to have a collaborative attitude towards our colleagues to support the achievement of organizational goals.
- To avoid activities that might damage the image or reputation of *Grupo BAL* companies. To represent the image of the companies by setting a good example.
- To comply with and monitor that the laws are respected, regardless of the time, place, or circumstance in which we are.
- To report all violations of which we are aware, including suspected violations of this Code. If we are uncertain about a potential violation, we should seek assistance or consult the Ethics Committee or Compliance. Directors, officers, and supervisors have heightened responsibility; if they suspect prohibited actions and fail to report them, they may also be held jointly responsible.
- To cooperate with investigations regarding violations of the Code and always tell the truth.
- To ratify our commitment to this Code by reading and signing, among others, the following documents:
  - i) Annual Statement of Compliance and Adherence to the Code of Ethics and Conduct,
  - ii) Annual Conflict of Interest Disclosure, and
  - iii) Commitment on Confidentiality and Information Management.



## VI. PEOPLE INTERACTION

*Grupo BAL* companies respect the diversity and inclusion of all people, so we value their different characteristics, beliefs, preferences, and backgrounds. We also respect human rights and labor standards.



## RESPECT FOR HUMAN RIGHTS

Employees and third parties who have a relationship with *Grupo BAL* companies or act on their behalf must:

- Treat every person with dignity and respect, without discriminating for ethnic origin, nationality, gender, age, disability, social or economic status, health conditions, religion, sexual orientation, marital status, trade union membership, or any other status that violates human dignity and is intended to nullify or impair the rights and freedoms of individuals.
- Strive to provide the necessary facilities and conditions within the workplace for employees with disabilities.
- Promote equal opportunities between men and women and do not allow gender violence.
- Prevent harassment, including workplace and sexual harassment.
- Respect people's privacy.
- Ensure that there is no forced or child labor.
- Respect the political preferences and affiliations of employees, without influencing, intervening, or restricting their participation in political matters.
- Respect people's freedom of expression and express our own in a respectful manner, without fear of reprisals and without compromising good coexistence in the workplace.



## EQUITABLE CAREER DEVELOPMENT

For *Grupo BAL* companies, human capital forms the essential basis for the achievement of its organizational goals; therefore, it encourages the training of its employees and favors the development of those skills that are related to the exercise of their functions. Likewise, hiring and promotions are based solely on the ability, results, and demonstrable professional merits.

For our part, we employees must be committed to our personal growth and professional development.



## HEALTH AND SAFETY AT WORK

The Group's companies are committed to the health and safety of their employees in the workplace and to maintaining an appropriate culture for risk prevention, so they provide training, equipment, and the necessary tools to maintain a safe and healthy environment for their employees.

Employees observe the internal rules of conduct, safety, and hygiene and under no circumstances we carry out actions that put at risk our physical integrity or our colleagues'. It is forbidden to consume, to

possess or to sell alcohol, narcotics, or any other prohibited substances on company premises, as well as to work under their effects. It is also forbidden to carry or to use weapons in the workplace.

## VII. INTERACTION WITH STAKEHOLDERS

The relationships we establish with the stakeholders of the Group's companies are based on respect, transparency, fairness, justice, and honesty.

Employees must treat shareholders, customers, suppliers, creditors, competitors, authorities, employees of other Group companies, our co-workers, and the public in general with impartiality, independence, objectivity, and respect.

Employees must inform agents, representatives, customers, suppliers, associates, and business partners with whom we establish working relationships, the guidelines of this document so that they adhere to them and do not carry out acts contrary to them.

As employees, we must avoid any risk of non-compliance with antitrust laws when interacting with competitors.





## WITH SHAREHOLDERS

*Grupo BAL* companies seek to be the best investment option in the medium and long term through growth and profitability.

For this reason, management teams should:

- Provide truthful information that reflects the real situation of the operations.
- Ensure the proper management of resources and assets.
- Report, eradicate and apply disciplinary measures for behaviors that go against sound business practices, market freedom or fair business dealings.

## WITH CUSTOMERS AND SUPPLIERS

*Grupo BAL* companies do business by providing products and services with the highest quality and timeliness within their reach, adhering to best practices.

Commercial relations with suppliers are carried out using selection criteria of quality, competence, impartiality, economic aspects, and experience, considering only the needs of the Group's companies.

In *Grupo BAL* companies, advertising is always done honestly, responsibly and in accordance with our principles, respecting our competitors and adhering to the applicable legal provisions.

Those who want to be suppliers of the Group's companies, in addition to sharing our values, must:

- Be partners who base their relationships on good business practices and ethical commitment.
- Report any illegal activity, malpractice, or breach of the Code of which they are aware. .
- Establish mutually beneficial, long-term relationships.

Likewise, all employees, in our dealings with customers and suppliers, refrain from:

- Conducting business with companies that are not legally incorporated or not in good standing.
- Delay or anticipate the payment or collection of invoices, without any justification.
- Soliciting, giving, or receiving any improper inducement.
- Paying suppliers or contractors other than those who provided the services or products.



## WITH AUTHORITIES

We, the employees, must:

- Carry out, in accordance with the applicable laws, the agreements, procedures and relations that, on behalf of the companies of the Group, we carry out before governmental agencies or officials.
- Collaborate with the authorities in the exercise of their powers and always act in the best interests of *Grupo BAL* companies.
- Do not falsify facts, information, or documents.
- Refrain from participating directly or indirectly in any tender or bidding process where there are indications of corruption. If they are identified, we must report them to the authorities.
- Respond in a timely and transparent manner to requests for information and observations from the authorities.
- Submit to the corresponding authorizations, investments, and commercial activities with natural or legal persons that are directly or indirectly controlled by public officials; in any case, they must be carried out in a transparent manner and in strict compliance with the law.

## WITH GRUPO BAL COMPANIES

The employees of *Grupo BAL* companies who, among our functions, carry out business and/or records for two or more companies of the Group, are required to know, to comply with and to enforce compliance with the laws and regulations that exist, so we must:

- Perform transactions at market prices.
- Comply with regulations regarding transfer pricing, payment of royalties and use of trademarks.
- Comply with the regulations related to the granting of loans in which a market interest rate and commercial conditions must be agreed.
- Respect the provisions concerning issues of unfair competition.
- Obtain, in appropriate cases, authorizations from the appropriate person or internal governing body.







## VIII. CONFLICTS OF INTEREST

They arise when personal interests come into play and conflict with those of *Grupo BAL* companies. Because conflicts of interest can affect our judgement and objectivity in decision-making, we must always put the interests of the Group's companies before any other interests.

Employees must avoid conflicts of interest, real or even apparent, in all activities in which we participate; however, if there is any, employees have the obligation to disclose such circumstances to those indicated in the Conflicts of Interest Policy before the activities or operations are carried out.

A conflict of interest exists when employees carry out any of the following actions or, being aware of them, do not report them:

- We carry out transactions for *Grupo BAL* companies with customers, suppliers, or their business partners with the purpose of obtaining a personal benefit, or for a family member or for a third party.
- We own shares of a competitor, customer or supplier that were not acquired through the stock market.
- We hold financial interests in transactions with Group's companies directly or indirectly (for example, through a member of our family). Such an interest must be approved before the transaction is executed.
- We perform the duties of a board member, corporate governance committee member, secretary, director, or officer, in a company outside the Group, without the express authorization set out in the Conflicts of Interest Policy.
- Participate in business or activities seeking personal benefit (directly or indirectly via

third parties) taking advantage of any relationship developed by our functions as employees.

- We grant loans to employees with resources from Group companies without adhering to established policies.
- Hire or influence in the hiring of personnel who are relatives of employees, customers, suppliers, members of the Board of Directors or any other party interested in the Group's business, without the corresponding authorization.
- We rehire former employees of Group companies or acquire goods or services from them, without the respective authorization.
- Acquire, without authorization, work, or professional commitments in addition to those provided in the companies of the Group.

Any employee who discovers a conflict-of-interest situation or a potential conflict of interest must inform the Compliance area, the Ethics Committee or report it to the whistleblower hotline.


Employees are required to file a Conflict-of-Interest Statement at the time of hire, annually, or whenever a potential conflict of interest situation arises.

# IX. PREVENTION OF BRIBERY AND CORRUPTION



## ZERO TOLERANCE

*Grupo BAL* companies take pride in conducting all their operations and business relationships in an ethical manner. Therefore, they have established a zero-tolerance policy for bribery and corruption, according to which all employees must adhere to the laws in force.



Bribery is any offer, promise or giving of a benefit, whether in money, gifts, entertainment payments, hospitality, travel, dues payments, vacations, offers of employment, privileges, loans, personal services, assumption of obligations or the giving of anything of value in exchange for:

- Avoiding compliance with a legal provision, administrative or judicial resolution.
- Failing to comply with other companies' code of conduct or statement of ethical principles.
- Obtaining direct or indirect advantage.
- Influencing a decision.
- Securing a business.

The above applies whether it is carried out with public officials, authorities, private companies or between individuals.

It is strictly forbidden for employees to bribe public officials or any other third party.

Corruption is the abuse of power for personal benefit or for a third party. Corruption encompasses a variety of situations such as: bribery, nepotism, collusion, influence peddling, facilitating or accelerating payments, bribery, conflicts of interest, theft, extortion, embezzlement, misuse of resources, among others.

It should also avoid acts that may be legitimate but are used to promote corruption, such as invitations to entertainment events, trips, donations, or any other similar events. Meals with public officials must be approved in accordance with the corresponding internal policy.

The directors of *Grupo BAL* companies do not take decisions which action could jeopardize the freedom and integrity of other employees or collaborators.

Employees, persons representing or related to Group's companies (such as agents, suppliers, business partners or any third party) are forbidden to engage acts of bribery or corruption or acts that could be perceived as such.

## GIFT ACCEPTANCE

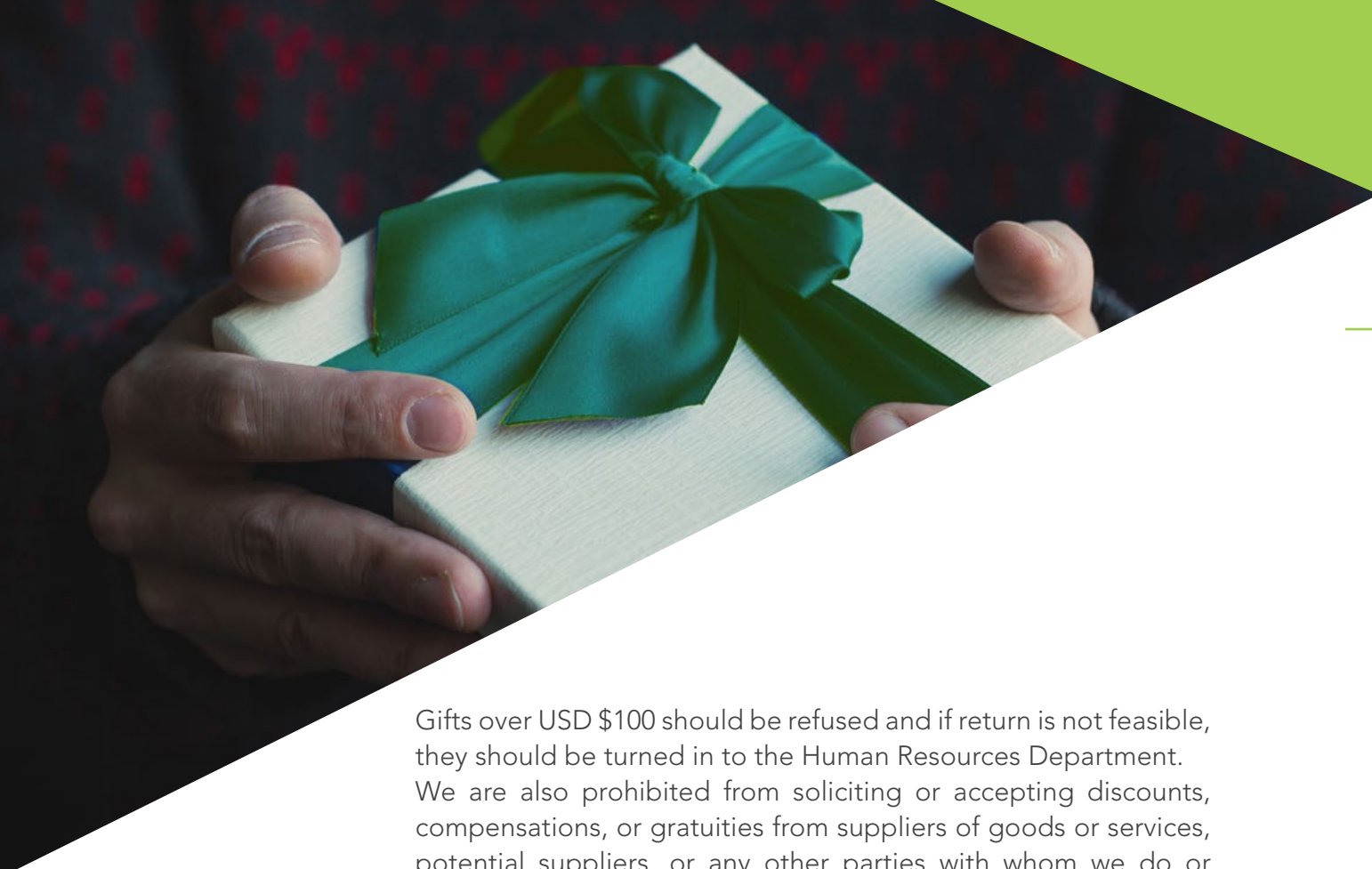
We do not accept gifts from third parties that are or could be perceived as an act of bribery or corruption that in any way compromises the exercise of our function.

As a rule, Group's companies expect gifts to be received only during typical cultural holidays of the year (such as Christmas).

Employees who know of, suspect or are victims of acts of corruption must report it to their immediate supervisor, to the Compliance area or through the whistleblower hotline.

The disciplinary measures for anyone who participates in acts of bribery or corruption, either directly or through a third party, are: (i) in the case of employees, the termination of their employment contract and (ii) in the case of third parties, the termination of the commercial relationship with the Group's companies. The foregoing, in addition to the measures that may be legally applicable.

Employees must refuse a gift if there is a risk that it could be considered or perceived as a bribe or if it is excessive in value. It is our policy that employees should not solicit or accept entertainment invitations, special treatment or gifts valued at more than the equivalent of USD \$100 and under no circumstances should we accept cash gifts.



Gifts over USD \$100 should be refused and if return is not feasible, they should be turned in to the Human Resources Department. We are also prohibited from soliciting or accepting discounts, compensations, or gratuities from suppliers of goods or services, potential suppliers, or any other parties with whom we do or may in the future do business, and we must not agree to make payments outside of the contracted terms.

In case of doubt, employees should seek guidance from the Compliance area.

## GIFT GIVING

*Grupo BAL* companies may give gifts to third parties only if they are not public servants or officials, that they are reasonable gifts and that the following conditions are accomplished:

- To not aim to influence the business decisions of third parties.
- To be approved by the General Management.

Employees of *Grupo BAL* companies must not offer commercial conditions other than those established, nor give gifts whose commercial value is greater than the equivalent of USD \$100.

## INVITATIONS AND COURTESIES

It is forbidden for all employees to accept invitations, whether for their own benefit or for their family members, that come from suppliers, customers, or competitors, to shows or sporting events, as well as courtesies or compensation of any kind. In the case of invitations for commercial purposes such as presentations and conferences, these must adhere to internal policies and to be authorized by the General Management before being accepted. Travel expenses must, in all cases, be covered by the relevant *Grupo BAL* company.

## POLITICAL CONTRIBUTIONS

Employees must not make direct or indirect contributions or donations on behalf of *Grupo BAL* companies to political parties, electoral campaigns or any individual or legal entity, association, organization, trade union or any other type of public or private entity related to political activities, whether in Mexico or abroad. If we make personal contributions, these must comply with the applicable legislation.

*Grupo BAL* companies recognize and respect the right of their employees to participate in political activities; however, they must be legal and not interfere

with or compromise the obligations and responsibilities that the employee has assumed as part of his or her employment relationship.

Political activities must not be carried out in any way on behalf of Group's companies, nor may they be construed as a contribution made on their behalf; furthermore, under no circumstances may we, employees, use company time and resources (office, equipment, utility vehicles, machinery, etc.) for these purposes.

## X. FAIR COMPETITION



*Grupo BAL* companies promote fair competition and the sound conduct of business; therefore, employees must comply with the regulations applicable to intellectual secrets and industrial property of our competitors or any other third party. Under no circumstances are we authorized to use deception, bribery, corruption, or infiltration techniques to obtain confidential or reserved information from third parties; nor are we allowed to make agreements outside the legal framework with our competitors' personnel, or to share information from the Group's companies with them. If for any reason it is necessary to share information with competitors, it must be done in compliance with the law and with the required approval in accordance with internal policies.



## XI. MONEY LAUNDERING

Employees and third parties acting on behalf of *Grupo BAL* companies must know and comply with the legal provisions applicable to the prevention of money laundering and terrorist financing, to prevent the use of services or products of *Grupo BAL* companies to hide or simulate the origin of illicit resources.

To ensure compliance with this regulation, we have established procedures and controls within our business processes. Likewise, we train our employees for their correct execution, and we monitor their compliance

## XII. CRIME PREVENTION

*Grupo BAL* companies are committed to prevent the commission of crimes within the organization. This requires strict and diligent behavior by all employees in compliance with the law.

If employees or third parties become aware that a crime has been committed, we must report it immediately to the Compliance area, the Ethics Committee or through the whistleblower hotline.

*Grupo BAL* companies will apply the appropriate disciplinary measures without detriment to any legal consequences.



The image features a 3D rendered set of three silver keys on a ring, positioned on a document. The document contains a bar chart with several bars of varying heights and a series of numbers (8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 24, 25) arranged in a grid-like pattern. The keys are highly reflective and detailed. The background is a dark red diagonal band that serves as a backdrop for the text.

## XIII. CARE AND PROTECTION OF RESOURCES

We must promote the care and safeguarding of our physical and informational assets to protect them against loss, theft, and misuse.



## INTELLECTUAL AND INDUSTRIAL PROPERTY

In addition to the industrial property respect of our competitors, we employees respect the intellectual and industrial property rights of *Grupo BAL* companies and, in general, of all persons and companies in accordance with the applicable regulations, even when our employment relationship has ended.

The creation of new technology, inventions or literary or artistic works that we employees create as part of our work are property and exclusive use of the Group's companies.

## VERACITY OF THE INFORMATION

The veracity and integrity of the operating, commercial, accounting, and financial records of the Group's companies are based on the accuracy of the information with which they are prepared.

The employees involved in its creation and registration are responsible for:

- Not misrepresenting any facts, information, or documents.
- Respecting the regulations.
- Avoiding altering the natural flow of information from its generation to its communication.
- Not hiding information from auditors who require it.
- Recognizing and recording assets and liabilities timely, properly and at fair value.
- Delivering complete and correct accounting or financial information to the stock exchange institutions and other authorities and institutions as appropriate, as well as to the addressee in a timely manner.
- Protecting the integrity of the documents and databases in our custody, observing the legal terms of conservation of the same and destroying it at the expiration of such terms.

The people in charge of preparing and distributing the information to be disclosed to the market must ensure that it is adequately disclosed and that it represents the transactions recorded, always in compliance with the applicable regulatory framework.



## TECHNOLOGY AND INFORMATICS

The technology and IT resources of *Grupo BAL* companies shall be used only for the purposes of the companies.

It is forbidden to use of the technology and IT resources for:

- Broadcasting, storing, or distributing harassing, mobbing discriminatory in any form, offensive, defamatory, pornographic, fraudulent, threatening, or disruptive messages, as well as "chain" type messages that request forwarding of the same.
- Accessing Internet pages that damage computer equipment and information.
- Causing security breaches or disruption of network communication.
- Usurping the identity of a user; as well as, revealing your password to others.
- Infringing the copyrights, trade secrets or patents or similar intellectual property of any person or company; for example, unlicensed software.
- Downloading or installing programs and files that are not required for operation.
- All software that is necessary for the operation must be authorized before being acquired by the corresponding Group's company. Software that does not have the approval of the Systems Department must not be installed.

## HANDLING AND CONFIDENTIALITY OF INFORMATION

All financial, strategic, statistical, operational, technical, business, acquisition or expansion plans, new products, marketing campaigns, personal information of shareholders, directors and employees of *Grupo BAL* companies or related to them, which is not known to the public, which may or may not be considered as a trade secret, is considered strictly confidential, so that employees are responsible for safeguarding it and refraining from disclosing it.

In addition:

- Employees of Group's companies must refrain from disclosing non-public, restricted, or confidential information to any person (including colleagues, family, or friends), except when required for business reasons with the prior authorization of the authorized officer, after having informed the immediate supervisor or the owner of the information in writing. The commitment of not to disclose the information continues even if you leave the employment of any of the Group's companies.
- No actions shall be carried out that result in any kind of personal gain or benefit from the access to privileged information that one has as an employee.
- The creators, custodians, or owners of restricted or confidential information shall protect, classify, and label it as such.
- Those who have access to restricted or confidential information and facilities are jointly responsible for the consequences of granting access to them.



## ASSET PROTECTION AND USE


- Those who have access to passwords, electronic signatures, etc., are jointly responsible for the consequences of their misuse or loss.
- Employees of *Grupo BAL* companies with access to confidential or privileged information may not, either directly or through a third party, including blood relatives, acquire or sell shares in the Group's companies, unless they comply with applicable laws and regulations.
- Any case of unauthorized access or attempted unauthorized access to restricted or confidential information will be presented to the Ethics Committee to define the actions to be taken.
- It is forbidden to take photographs, videos, audio recordings and live broadcasts within the Group's companies' facilities without the corresponding authorization.
- Employees of *Grupo BAL* companies who carry out academic activities, such as lecturers or students, may only use public information of the Group's companies.
- Employees shall not spread or disclose rumors that directly or indirectly affect the reputation of other employees and companies of *Grupo BAL*, its shareholders, and directors.
- Any disclosure of information through the media will only be permitted to authorized persons.

- The assets owned or leased by *Grupo BAL* companies, whether they are tangible assets (cash, securities, furniture, real estate, machinery, equipment, vehicles, etc.) or intangible assets (trademarks, patents, logos, concessions, etc.), may be used by employees and authorized third parties only to carry out the operations of the corresponding company and not for their personal use, unless it is for employment benefits.
- The employees will use the services, resources, and tools available (email, computer, cellphone, telephone, internet, utility car, offices, among others), efficiently and exclusively for the fulfillment of the functions that have been assigned to us. In addition, we must comply with specific policies for their use, as well as policies related to information protection and data privacy. Likewise, it is strictly forbidden to use the name of the Group's companies to create

accounts, groups, or profiles on social networks (Facebook, Twitter, Instagram, LinkedIn, etc.) others than institutional ones.

- We, the employees, acknowledge and accept that the computer equipment and communication that we receive for the performance of our duties (cellphone, telephone, electronic tablets, computers, email accounts, etc.), are work tools, that all information and communications contained in such equipment are property of *Grupo BAL* companies and that they may be reviewed, copied, transmitted, stored and used by them at any time, without





the need for us to be present and without the need to inform us, for any purpose that suits them. Hence, the personnel authorized to monitor, as well as authorized service providers for these purposes, will have unlimited access to the information and communications in the computers and communication devices owned by *Grupo BAL* companies.

- Likewise, we, the employees, accept that the authorized personnel of *Grupo BAL* companies and the service providers hired for these purposes, will have unrestricted access to the offices, to the email accounts assigned to us and to the instant messaging applications that we use in the equipment owned by the companies. Los colaboradores de las empresas de *Grupo BAL* renunciamos a argumentar cualquier derecho sobre confidencialidad, privacidad personal o de las comunicaciones, al utilizar los equipos de cómputo y telecomunicaciones que recibamos como herramientas de trabajo.
- The employees of *Grupo BAL* companies waive the right to argue any right to confidentiality, personal privacy, or communications, when using the computer and telecommunications equipment that we receive as work tools.
- The employees who safeguard the assets are responsible for their physical condition, integrity, and use.

# XIV. COMMITMENT TO SOCIETY AND THE ENVIRONMENT

We must promote respect for human rights, environmental protection, and good relations with the communities where we operate.





## CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility is the balance between the objectives of business and the interests of the community.

Employees must adopt a conscious and consistent commitment to fully comply with the purpose of the Group's companies both internally and externally, considering the expectations of all its participants in the different areas: social, human, and environmental, showing respect for ethical values, people, communities, and the environment, to achieve the construction of the common good.

This commitment entails:

- The performance of each of the employees of Grupo BAL companies, consciously and committed to the continuous improvement, living the values, and performing ethically with honesty and transparency, thus generating added value to promote and contribute to the full development of people, communities, and the environment, in an ethical, sustainable, and responsible manner.
- The development of the operations of the Group's companies minimizing the damage to nature, promoting the prevention, care, control, and reduction of environmental impacts.
- The care of the environment through the development of strategies aimed at achieving:
  - i) efficiency in the consumption of resources such as water and non-renewable materials,
  - ii) to minimize the environmental impact with the use of clean energies,
  - iii) to prevent pollution by reducing, reusing, and recycling waste, and
  - iv) to protect ecosystems by promoting reforestation and care of wildlife, among others.

We also implement measures to provide a timely response to possible contingencies. *Grupo BAL* companies strictly comply with environmental protection laws and regulations when carrying out their activities.

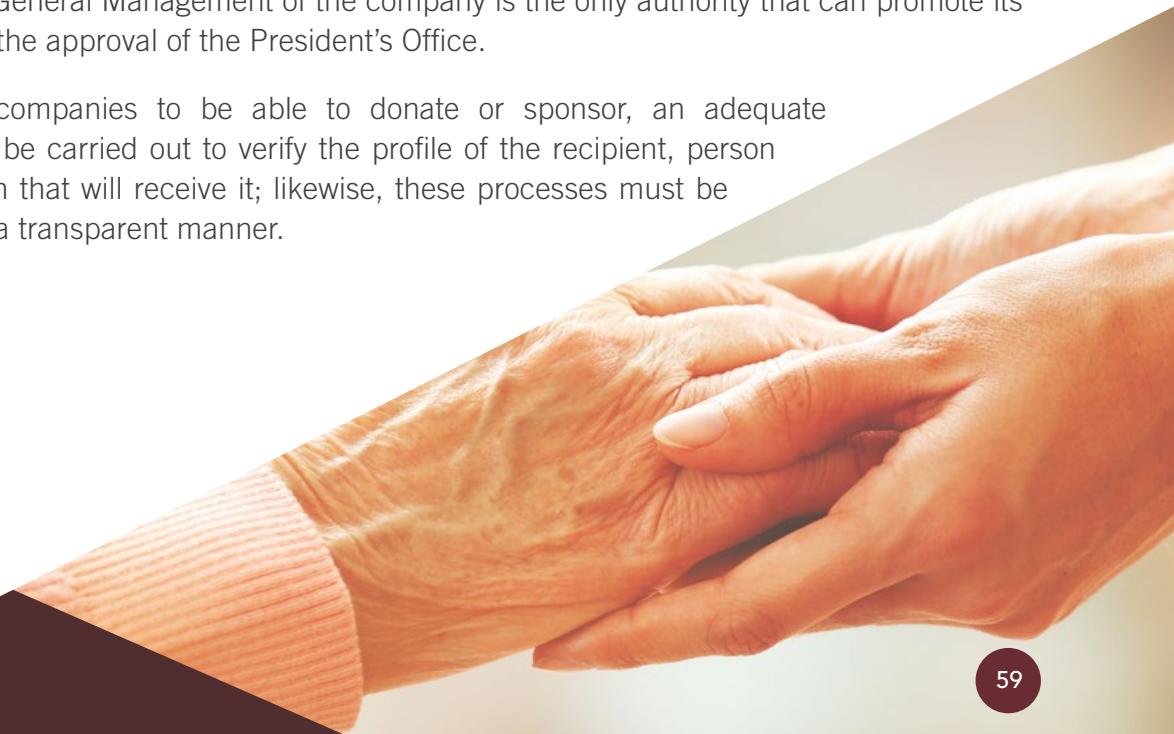
## SUSTAINABLE DEVELOPMENT

*Grupo BAL* companies promote respect for labor rights, as well as the appropriate balance between work and personal life. As employees, we are committed to ensuring health and safety at work, as well as maintaining a good relationship with the communities where we work, basing our operations on regulatory compliance, under a culture of sustainable development and continuous improvement.

## CHARITABLE DONATIONS AND SPONSORSHIPS

Any charitable donation or sponsorship must undergo a formal approval and documentation process. The General Management of the company is the only authority that can promote its approval with the approval of the President's Office.

For Group's companies to be able to donate or sponsor, an adequate process must be carried out to verify the profile of the recipient, person or organization that will receive it; likewise, these processes must be conducted in a transparent manner.



## XV. PROVISIONS FOR BOARD OF DIRECTORS AND THEIR COMMITTEES

It is expected that, by their example, the Boards of Directors members and their committees will be the main promoters of the values and principles of conduct contained in this Code.



The members of both the Boards of Directors and their Committees add strength to Corporate Governance; therefore, to permanently maintain their oversight function and their duty of loyalty and diligence to *Grupo BAL* companies and their shareholders, the following conducts are expected from them:

- To provide impartial advice to the companies' management.
- To exercise their functions within the approved limits.
- To avoid conflicts of interest between its activities and possible similar commitments to other organizations.
- To establish lines of communication and monitor progress towards corporate objectives.
- o refrain from buying, selling, or providing products and services to *Grupo BAL* companies at non-market prices and without the corresponding consent.
- To inform when any of their family members is an official or employee of the companies, before accepting their assignment as a director.



## XVI. DISCIPLINARY MEASURES

Employees must always comply with the ethical principles of this Code.

These are considered violations of the Code of Ethics and Conduct:

- To not follow our principles and obligations.
- To request or to order other employees not to comply with them.
- To not report observed violations or suspected violations.
- To not cooperate or to obstruct investigations.
- To not apply disciplinary measures for the non-compliances with this Code.

Violations will result in disciplinary measures that will vary depending on the circumstances and severity of each case. Before any disciplinary measure is determined, the available evidence is validated while respecting the rights of the individuals involved in the allegations.

Among others, and at the discretion of the Ethics Committee, one or more of the following disciplinary measures may be applied:

- Verbal warning.
- Written warning.
- Temporary suspension of duties or certain benefits.
- Termination of the employment relationship.
- Others that may be legally applied.





## XVII. ASSISTANCE AND REPORTING CHANNELS

Employees must support the good development of our companies by reporting deviations from this Code.



## REPORTING ASSISTANCE

This Code of Ethics and Conduct does not cover all situations or circumstances that may arise; therefore, if there is any doubt about its content, further information may be requested from the Compliance area.

## CHANNELS FOR REPORTING

To provide various anonymous and confidential means of communication that facilitate employees, suppliers, customers, business partners and other interested parties, the communication of situations or events that may correspond to a violation of this Code, a system has been established to deal with complaints with the following channels that are available 24 hours a day, 365 days a year:

- Phone: 800 0146774
- Email: [bal@lineacorrecta.com](mailto:bal@lineacorrecta.com)
- Website: <https://bal.lineacorrecta.com>

The employees of *Grupo BAL* companies take the reporting of misconduct and illegal practices seriously, so under no circumstances do we report any person unfoundedly or in bad faith.

## NON-RETALIATION AND WHISTLEBLOWER PROTECTION

*Grupo BAL* companies are committed to the protection of whistleblowers, so it is forbidden to impose any form of punishment or retaliation against individuals who raise or assist in raising a genuine concern about a breach of this Code. Retaliation will be grounds for disciplinary measures, up to and including dismissal.

Employees must inform the Ethics Committee, the Compliance area, or the whistleblower hotline when we are unable to fulfill our responsibilities objectively due to pressure from a third party because of their position, authority, or influence in the organization.

An objective, thorough and fair investigation of allegations will be conducted before a disciplinary measure is applied. Cooperation is expected from employees and third parties in internal or external investigations.

All complaints are treated confidentially, including when they are not received anonymously.



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