

CLASE AZUL.



CODE OF ETHICS

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PART 1 Prologue



HOW DO WE HONOR OUR PURPOSE AS A COMPANY?

The purpose that guides Clase Azul México is more than just a statement; it is the essence of our existence and the engine that drives all our actions. "Captivating the world through the magic of Mexican culture while transforming ourselves into better human beings" is our call to greatness. This purpose inspires our passion, teamwork and desire to share our cultural heritage. As leaders and colleagues of Clase Azul México, safeguarding this purpose is our duty, as it allows us to honor our ancestors and preserve our legacy and essence for future generations.

WHY DOES THIS DOCUMENT EXIST?

This document recognizes that we do not all think alike or share the same beliefs about the world. Its purpose is to establish behaviors that promote mutual respect. It does not limit freedom or autonomy but defines the necessary limits for a healthy and collaborative coexistence.

WHY ARE VALUES IMPORTANT FOR THE COMPANY?

Our values are like the rules of a board game or a sport, a clear framework that fosters mutual respect. Honesty, positive attitude, teamwork, quality and responsibility are the pillars upon which we build trust. All the members of Clase Azul México share and take pride in these values. Putting them into practice makes us better versions of ourselves, creating an environment where excellence and integrity are not aspirations, but our reality.

ARTURO LOMELÍ
CEO y Fundador



How does Clase Azul México honor its values?

CULTURE OF TRUST AND RESPECT

At Clase Azul México, we all contribute to building our culture and fulfilling our purpose. We firmly believe that collective well-being is born from shared effort. For this reason, Clase Azul México ensures that the behavior of all its collaborators is based on TRUST AND RESPECT.

HOW DO WE CREATE A CULTURE OF TRUST AND RESPECT?

Let us all be guided by this document and honor our values with the certainty that we each do what we are supposed to; understanding our purpose in depth and coordinating to achieve our shared goals step-by-step.

III. Clase Azul México gives access to the following tools to colleagues, audiences and clients so that they can make use of them: BEHAVIOR GUIDES.

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- I. The first Code of Ethics of Clase Azul México was drafted in 2015 to complement the literature that existed at that time.
- **II.** This Code of Ethics is regularly updated and pursues a twofold ambition:
- To present the values of Clase Azul México in a simple and methodical way, as well as a legal framework aligned with all relevant national and international standards.
- Address all colleagues of Clase Azul México, regardless of their position, and all the audiences with whom we interact to ensure comprehension of the guidelines being presented.





OUR VALUES

Our values are the principles that distinguish us as a company and are reflected in everything we do. Each colleague of Clase Azul México should reflect these values and the ones we forge must be aimed at finding those who share these principles.

The five values of Clase Azul México are:

Honesty

To look for congruence between what we think, say and do.



Attitude

Maintain a positive stance and befirm in the search for solutions.



Quality

To be consistent and excellent in our effort to achieve our goals.



Teamwork

Collaborate with our colleagues, aware that we share the same objective.



Responsibility

To be faithful to our commitments, taking responsibility for what we do and what we currently are not doing.





HOW CLASE AZUL MÉXICO HONORS YOUR VALUES

Honesty

- Clase Azul México shares messages aimed at its audiences in a clear, concise and timely manner.
- Invites all its audiences to act in accordance with the company's institutional values.
- Is a reference and example of congruence for all its audiences, encouraging them to be coherent in their words and actions.

Attitude

- Clase Azul México fosters empathy and respect in its daily dealings with its audiences.
- Encourages and challenges their audiences to solve problems with creativity and proactivity.



Quality

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- Clase Azul México transmits its savoir-faire (the mastery of its unique and own processes) to colleagues through continuous and specialized training.
- It guarantees the highest quality in all its products and provides an excellent service with luxury standards.

Teamwork

Clase Azul México constantly reiterates its organizational purpose, a common goal, to its audiences to promote its fulfillment.

It fully trusts its audiences and invites each person to make decisions based on individual freedom and attachment to shared goals.

Responsibility

Clase Azul México takes care of all its colleagues and audiences by providing them with a safe and trusting work environment.

They keep colleagues and audiences informed about events within the organization through newsletters, communiqués, public forums and talks with leaders, among others.

Educates on the appropriate and responsible use of the company's financial resources for the fulfillment of the organizational purpose.

Demonstrates a genuine interest in the professional growth of their colleagues, offering them opportunities and development tools that are tailored to their individual needs.

It promotes a healthy and balanced lifestyle, as well as support for personal transformation, through nutrition, physical and mental health, among other tools and services.



BEHAVIOR PRINCIPLES

Clase Azul México's actionable values have their applications in business practices for our colleagues and other key audiences. The most relevant are cited in this document. For more in-depth consultation, please review the BEHAVIOR GUIDE.

DIVERSITY, EQUITY, INCLUSION AND EQUAL OPPORTUNITIES:

Clase Azul México does not discriminate based on sexual preference, gender, religion or ethnicity, and strives to provide all its colleagues and audiences with the means to feel supported and included under a framework that guarantees equal opportunities.

HARMONIOUS AND HARASSMENT-FREE WORK ENVIRONMENT

Clase Azul México does not tolerate any type of harassment, discrimination, intimidation, harassment or humiliating or violent behavior, whether psychological, sexual, physical or that constitutes an abuse of power. It is the responsibility of everyone to behave with integrity and address colleagues and audiences with respect without violating their dignity and rights.

CONFLICTS OF INTEREST

Conflicts of interest can arise when personal, family, financial, political, or other interests interfere with or conflict with a member's loyalty to the company or with their ability to make appropriate decisions on its behalf.

A colleague who establishes a romantic relationship with any member of the company may not belong to the same hierarchical line and area. If so, you must report it to the Talent and Culture area. Similarly, if you have family members working at Clase Azul México, you must report it immediately, and in both cases document it through the conflict-of-interest declaration form.

If any concerns arise about potential conflicts of interest, especially in the case of leaders responsible for approving purchases or making decisions, it is crucial to reach out to the direct supervisor,

legal department, or a Talent & Culture partner to address the situation appropriately.

GIFTS TO COLLEAGUES AND PROVISION OF PRODUCTS

As colleagues of Clase Azul México, we have access to the brand's products and experiences. It is our responsibility to make good use of them, as they are products and experiences not intended for the public.

RESPONSIBLE CONSUMPTION OF ALCOHOL, TRAVEL EXPENSES AND SUPPLIES

Each member of our audiences is an ambassador for the image of Clase Azul México and actively advocates for the responsible consumption of alcoholic beverages.



For more details on any point, please refer to the **BEHAVIOR GUIDE.**



How do our leaders honor values?

HOW WE HONOR THE LEADERS VALUES

Honesty

With transparency:

Be direct, honest, and clear with what you expect from your work teams. Recognize when you don't know and when you are wrong. Raise your hand when you need support.

With integrity:

Always make positive choices, **even** when no one is watching.

Attitude

With warmth:

Relate to your work teams and colleagues with kindness, consideration and respect.

Open Minded:

Open dialogues, willingness to listen and providing feedback in an assertive and timely manner.

Motivated:

Positively influence your colleagues. Promote initiatives favorable to the continuity and improvement of the company.

Quality

With sensitivity:

Get to know your work teams to determine their needs and provide them with the necessary tools for their development.

With excellence:

Constantly improve yourself.

Motivate your work team not to lower their standards, considering that the growth of the entire team depends on the developmental capacity of its leader.

Teamwork

With confidence:

Be an example for your work team and other colleagues. Share your knowledge with them and motivate them not only to acquire it, but to surpass it.

With genuine interest:

Show a genuine interest in the development of your work team. With daily interactions:

Seek constant dialogue to contribute to collective success.



Responsibility

With caution:

Be sensible and aware of how your actions and words affect your environment.

Financially conscious:

Be responsible for the investments that are made. Make use of the goods and resources of Clase Azul México as if they were your own. Be responsible for the company's movable or real estate assets and avoid using them in ways that are foreign to your needs. Use your ingenuity and creativity when using the company's resources.



THE COMMITMENTS OF THE LEADERS OF CLASE AZUL MÉXICO

1.

As leaders, we are references of the principles and values of Clase Azul México. **Our behavior impacts the different audiences we engage with.** 2.

As leaders of Clase Azul México, we are committed to ensuring business prosperity by **establishing genuine connections with our colleagues.**

3.

It is our responsibility, both individually and collectively, to live the company's values in our day-to-day lives to serve as inspiration by example.



We are aware of our

responsibility to share an exquisite and unique of Mexican culture.

We seek to be a global benchmark in the luxury industry through innovation and excellence in our products and experiences.



How do we honor our colleagues values?

HOW WE HONOR OUR COLLEAGUES VALUES

Honesty

With transparency:

Speak your mind respectfully and through the right channels.

Communicate directly with your leader by giving feedback that favors team and company dynamics.

With integrity:

Understand what is expected of you and try to do things to the best of your ability.

Own the purpose of Clase Azul México and consider how it aligns with your purpose and personal values.

Teamwork

With conviction:

Believe in the company's purpose, honoring it with every gesture you make.

With passion:

Show your love for what you do.
Show genuine interest in the
company and your interactions with
your colleagues.

With daily interactions:

Encourage conversations between colleagues and leaders from different areas of the company to contribute to collective success.

Attitude

With warmth:

Address your colleagues with respect, kindness, and consideration. Look for harmony in the spaces in which you collaborate.

Open minded:

Communicate with your direct leader and colleagues in an assertive and timely manner.

Approach your leader or the Talent and Culture team to find the necessary tools for your personal and professional training.

Motivated:

Contribute ideas constructively and proactively, always seeking to obtain extraordinary results. Inspire and encourage your colleagues to leverage their talent to innovate and improve every day or identify areas of opportunity in organizational processes.



Quality

With sensitivity:

Be confident in your ability to execute tasks flawlessly. If you need help, ask for support from your direct leader and colleagues, as it is crucial to always meet the standards of a luxury home.

With excellence:

Develop your skills and criteria so that you can support your team based on your experience.

Responsibility

With caution:

Be sensible and aware of how your actions and words affect your environment.

Carefully:

Be an exemplary colleague by fulfilling your responsibilities. Report through the appropriate channel any situation that threatens the company's values or that may affect its integrity or continuity.

Financially conscious:

Be responsible for the investments that are made. Make use of the goods and resources of Clase Azul México as if they were your own. Use your ingenuity and creativity when using the company's resources.



How do we honor the values of our allies and business partners?

HOW WE HONOR THE VALUES OF OUR ALLIESAND BUSINESS PARTNERS

Honesty

With transparency:

Please maintain clear documentation of all information from our contractual relationship.

Be consistent in the relationship between your rates and services.

With integrity:

Respect the contractual agreements reached with the company.

Adhere to the regulations of Clase Azul México and to national and international regulations when extracting raw materials and in all your product production processes. Ensure the traceability of all your actions.

Trabajo en equipo

Con confianza:

Comparte nuestros valores y buenas prácticas y apoya nuestro propósito. "Nos cuidas y te cuidamos".

Con consciencia:

Como aliado y/o socio comercial, mantén la confidencialidad de nuestros procesos organizacionales y maneja adecuadamente cualquier información tanto durante como después de nuestra alianza.

Attitude

With warmth:

Address Clase Azul México colleagues and your teams with respect, kindness, and consideration.

With openness:

If any difference arises with the colleagues of Clase Azul México, present your case in a cordial manner with the corresponding Talent and Culture partner.

If you identify any areas of opportunity in organizational processes, discuss them openly with your points of contact within Clase Azul México or with the corresponding Talent and Culture partner.

With provision:

Demonstrates flexibility and adaptability to the requirements of Clase Azul México and certifying companies.

Motivated:

Contribute ideas constructively and proactively, always seeking to obtain extraordinary results.



Quality

Masterfully:

Demonstrate the unique expertise and attention to detail that characterize your product or service.

With excellence:

Ensure that the quality of your product or service is optimal and consistent, aligned with the standards of a luxury house like Clase Azul México.

Responsibility

Carefully:

Report through the appropriate channel any situation that threatens organizational values or that may affect the continuity of the company.

Financially Conscious:

Be prudent and efficient in your processes to offer a better service or product, always looking for a win-win scenario.



Clase Azul México and Its Impact

CLASE AZUL MÉXICO AND ITS IMPACT

We seek to make a positive change socially, environmentally and culturally. We believe our presence is valuable to the communities in which we operate.

SUSTAINA-BILITY

We are committed to providing environmentally responsible products and services. We strive to follow best practices to minimize our impact, certifying ourselves in responsible disposal and reuse of waste. We comply with regulations national and international excellence, and we constantly innovate in favor of sustainability.



CULTU-RAL

We seek to promote Mexican cultural and artisanal legacy, both in the creation of Clase Azul México's products and experiences, and through Fundación Causa Azul, our nonprofit organization dedicated to empowering communities of artisans to develop and preserve their family and cultural heritage.



SOCIAL

We want to get more involved in the communities of the country where we have a presence. We can all share the enthusiasm with the shout of goal! Through initiatives such as our support for Club Atlético La Paz, we seek to strengthen community ties through experiences that promote social integration and a healthy lifestyle.





LEGALITY OF ACTIVITIES

RELATIONSHIP WITH THE GOVERNMENT:

The relationship with government institutions (national and international) must strictly adhere to the rules and laws, which are imperative to know when establishing Clase Azul México businesses in other countries or states. If any uncertainty arises in a negotiation, interaction or activity, the Legal Department should be consulted and its recommendations followed.

NO BRIBERIES:

Any act of corruption is categorically rejected. Giving or receiving bribes is illegal and will have severe consequences for everyone involved. We are committed to conducting our operations in a transparent and comprehensive manner; all our transactions must adhere to anti-corruption laws, including requirements to maintain complete and accurate accounting books and records.

CONFIDENTIALITY OF INFORMATION, USE OF DATA AND INTELLECTUAL PROPERTY:

The goods and resources protected by the intellectual property of Clase Azul México must be used in a reasonable, legal and appropriate manner. Their use, sale or loan without corresponding explicit authorization is prohibited. The following concepts are under the protection of the intellectual property of Clase Azul México:

- The registration of the trademarks that protect our products.
- The patents that protect our inventions, such as our unique technologies and production methods.
- The copyrights and designs that protect our advertising materials, bottles (decanters), products, and characteristic packaging.
- Our trade secrets, such as formulations and distillation processes.

Clase Azul México respects and protects the personal information of its colleagues, customers, suppliers, consumers and other audiences, ensuring compliance with current regulations on data protection. The use of this data must be exclusively for legitimate business purposes and comply with the Use and Data Protection Policy authorized by the audiences.

CULTURAL APPROPRIATION:

As promoters of Mexican culture, we have a responsibility to protect and respect the diversity of our country's handicrafts. Their use in our products must be based on respect and appreciation, always in collaboration with the artisans who create and safeguard them. Clase Azul México does not tolerate cultural appropriation and adheres to national regulations to honor Mexico's artisanal legacy.

SOCIAL NETWORKS:

Everything that colleagues, suppliers and audiences linked to Clase Azul México do or express about the company can affect its reputation. We invite our audiences to be prudent when expressing their opinions about the company on social networks, clarifying that the opinion is personal and not the official position of Clase Azul México. Any improper use of the company's logo or name on personal social networks could be penalized.

GIFTS, ENTERTAINMENTSOCIAL NETWOR-KS:TO AND HOSPITALITY:

Class Azul México colleagues may not accept or offer courtesies of any kind that compromise, or appear to compromise, our decision-making processes in current or future negotiations.



How does
Clase Azul México
handle the concerns
of its different
audiences?

USE OF CODE OF ETHICS

These pages summarize different scenarios to guide your decisions. If you do not find a specific case, we invite you to act according to the description of the values or consult with a Talent and Culture manager.

This Code of Ethics is protected by a series of internal control and audit mechanisms that guarantee compliance.

It is recommended to be aware of local uses and customs, understanding that each social and cultural context is different, both inside and outside of Mexico. Respect for different cultural identities is compatible with the spirit of this Code of Ethics.

All colleagues should be aware of and study this Code of Ethics and should use it appropriately.

All colleagues must collaborate diligently in compliance with this Code of Ethics, consulting any doubts with the Talent and Culture. Collaboration is also expected if required in investigation and/or audit processes.

This Code of Ethics fosters the company's growth by safeguarding its reputation and protecting our colleagues. It protects us all when it is applied correctly, as well as protects the identity of those who decide to denounce behaviors contrary to it. It is important to remember that the malicious use of the Code of Ethics and the mechanisms that support it will have consequences and that its abuse or improper use may result in sanction.





COMPLAINTS AND FOLLOW-UP

HOW DOES CLASE AZUL MÉXICO HANDLE CONCERNS OF ITS DIFFERENT AUDIENCES?

Clase Azul México takes very seriously the denunciations and follow-up of non-compliance with our Code of Ethics. If you or someone else has witnessed or been a victim of any wrongdoing, we invite you to report it.

To report any breach of the Code of Ethics by any of the audiences with which you are linked, follow the instructions below:

1

Review the Code of Ethics to be clear about what area is being violated. 2

Discuss the non-compliance situation with your leader.

3

If your leader is the offender, discuss the situation with your Talent & Culture Partner. 4

If you are not given the expected follow-up, report your complaint through the **Te Escucho line.**



teescucho@ethicsglobal.com



CONFIDENTIALITY

Both the Code Office and the Ethics Committee always guarantee the confidential treatment of the data of both the people who access them and the facts that are brought to their attention.

Inquiries to the Code Office may be sent anonymously, but in any case, a means of contact must be indicated so that the Office can issue a response.

On the contrary, and in order to guarantee the veracity of the information received, the complaints received through the Complaints Channel may not be anonymous, although the Ethics Committee will guarantee the confidential treatment of the data at all times.

Both the Code Office and the Ethics Committee shall ensure that there is no retaliation against those who access or use the procedures provided for in this Code in good faith.





LEGAL FRAMEWORK



The ethical principles of conduct of the Clase Azul México company are intended to respect the following key international references:

- The United Nations Universal Declaration of Human Rights and the European Convention on Human Rights.
- Several International Labour Organization Conventions, in particular Conventions 29, 105, 111 (discrimination), 100 (equal remuneration), 87 and 98 (freedom of association, protection of the right to organize and collective bargaining).
- The OECD Guidelines for Multinational Enterprises.
- The 10 Principles of the United Nations Global Compact and the corresponding Sustainable Development Goals (SDGs).
- The United Nations Guiding Principles on Business and Human Rights (UNGPs).
- The United Nations Principles for the Empowerment of Women.
- The application of ethical principles in our daily activities can generate doubts, so they must be constantly reinforced and encouraged through their knowledge and example, training and the right to ask.

- In addition to the Code of Ethics, which is
 the basis and framework for the company's
 ethical conduct, there are other
 documents with which it is essential to be
 familiar, and which must be applied
 correctly. It is therefore the responsibility
 of everyone to improve their knowledge of
 the issues that affect them, in accordance
 with their specific responsibilities, by
 reading the documents that complement
 the Code.
- All colleagues at Clase Azul México should be aware of the Code and its principles, reflect on their actions before acting, and, if they have doubts about their conduct, be careful. They should seek help if they do not know how to resolve the ethical dilemma they face and report any problems or breaches of the Code.
- We are committed to avoiding and penalizing any breach of the Code of Ethics, and to apply all necessary corrective measures.



Artisans of an exquisite life

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