



ANTI-CORRUPTION CODE OF CONDUCT

MESSAGE FROM THE OMA's CEO

The Code of Ethics and Business Conduct of Grupo Aeroportuario del Centro Norte, S.A.B. de C.V. and affiliates (hereinafter "OMA") promotes compliance with ethical values and standards of conduct applicable to all our employees.

The fight against corruption is a fundamental principle that permeates the activities of all our employees, encouraging them to adopt impeccable behavior and urging them to participate in the prevention of corruption within their daily activities.

At OMA, as a subsidiary of the VINCI Group, we conduct our activities in accordance with the principles and values that the VINCI Group applies in multiple countries. That is why our employees must abide by the highest standards in anti-corruption in order to protect the reputation of OMA and the VINCI Group.

This Anti-Corruption Code of Conduct establishes the identification of corruption risks and how to avoid them with specific examples, with the aim of ensuring that our employees abide by the rules contained in our Codes of Ethics and Anti-Corruption Conduct.

Ricardo Dueñas
OMA's CEO

A. INTRODUCTION

This Anti-Corruption Code of Conduct (the “Code”) is a guide that promotes the guidelines to follow for the identification of corruption risks in daily activities, based on the principles and values established in the OMA Code (the “Code of Ethics”) and applies to all staff, employees and managers (the “Collaborators”) as well as to clients, suppliers, service providers and contractors (the “Strategic Partners”).

Corruption is a behavior that seriously harms the economy, sustainable development, and the effectiveness of international and national trade, distorting competition to the detriment of consumers and businesses, which is why corruption is illegal in all countries of the world.

Bribery and corruption can take many forms; it is not limited to the exchange of cash. Employees must ensure they do not give, offer, or receive anything that could reasonably be perceived as a bribe, whether to circumvent compliance with a legal provision or to gain a business advantage.

OMA employees must participate in preventing corruption in their daily activities. To this end, this Code includes various ways in which corruption risks may arise in OMA's activities; it also provides answers to questions that employees may have they may arise when confronted with situations that pose a risk of corruption.

OMA, as a subsidiary of VINCI Group (“VINCI Group”), must conduct its activities in accordance with those applied by VINCI Group in multiple countries, in order to protect the reputation of OMA and VINCI Group.

The Code does not exhaustively address all possible situations; each Employee must perform their duties in accordance with OMA's principles and values, and in cases where they believe there is a risk of corruption, they must systematically refer to the applicable internal regulations. In case of regarding the interpretation of the rules of conduct in this Code, each Collaborator must refer to their hierarchical superior, the Legal Department, or the OMA Ethics Officers.

B. DEFINITIONS

B.1. CORRUPTION

Corruption is understood as *"the act of soliciting, offering, granting or accepting, directly or indirectly, a bribe or any other undue advantage or promise of advantage, which affects the normal exercise of the functions or behavior of the person benefiting from the bribe or undue advantage."*

This is dishonest behavior involving the person who misuses their influence to favor others in exchange for a benefit, and the person who proposes or provides the benefit. The person who favors the act of corruption is considered responsible, and the person who takes advantage of this act by receiving an undue advantage is considered a beneficiary; both people will incur legal responsibility.

Acts of corruption can occur through the direct or indirect intervention of the people involved, as follows:

- The one proposing the benefit acts through third parties (intermediaries, commercial agents, subcontractors, suppliers, business partners, among others);
- The person receiving the benefit is not the final recipient (family members, a third party, among others);
- The fraudulent act and the granting of the undue advantage do not occur simultaneously (the undue advantage may be anticipated or granted later);
- The undue advantage does not consist of the delivery of money (it may involve material objects, services rendered, reputational benefits, among others);
- The beneficiary is a public sector employee.

B.2. BRIBERY

Under Mexican law, bribery is defined as *"any act in which a person promises or gives any benefit to a public servant, and any act in which the public servant, either directly or through an intermediary, unlawfully solicits or receives, for himself or for another, money or any benefit, or accepts a promise to perform or refrain from performing an act inherent to his or her employment, position, or commission."*

Mexican law considers bribery an illegal act; this act constitutes a violation of the Federal Penal Code and the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the Organisation for Economic Co-operation and Development (OECD), to the *Foreign Corrupt Practices Act of 1979*, among others.

Accordingly, it is prohibited to make any payment, promise of payment, or give any object of value to officials or officers of national or foreign governments (the “Public Servants”). Violations of applicable law may result in civil and criminal penalties for both OMA and Employees. It is strictly prohibited to the Employees offering or delivering something of value, commission, or consideration for the purpose of influencing or persuading any Public Servant to obtain or maintain an undue benefit or advantage.

Bribery or corruption of any kind is considered a serious breach of this Code and will be considered a lack of probity or honesty under the Federal Labor Law, regardless of the legal responsibility incurred by the Employee who carries it out.

According to our Code of Ethics, gifts and favors accepted by Public Servants or members of their family may constitute bribery, although gifts are permitted up to the equivalent of a maximum of 25 Units of Measurement and Update (UMA)¹ in effect in Mexico City. Likewise, year-end gifts given to Public Servants in general must comply with this limit and will be authorized, where applicable, by the General Counsel and the CEO of OMA.

¹ On January 10, 2025, the update to the UNIT OF MEASUREMENT AND UPDATE was published in the Official Gazette of the Federation, determining that the daily value of the Unit in force from February 1, 2025 is \$113.14 Mexican pesos, in accordance with article 4 of the Law to Determine the Value of the Unit of Measurement and Update.

C. APPLICABLE LEGAL FRAMEWORK

OMA's employees, in carrying out their operations and activities, must conduct itself in accordance with the following regulations, which include those applicable to OMA as a subsidiary of VINCI Group:

a. OMA Internal Policies:

- Code of Ethics and Business Conduct;
- Code of Ethics and Rules of Conduct for Suppliers, Subcontractors and Business Partners;
- Anti-Corruption Code of Conduct.

b. VINCI Group's Anti-Corruption Regulations:

- The Manifesto: through which the commitment is established that ethics occupies a central place in contracts and in the relationship with clients and that the VINCI Group subsidiaries worldwide must apply this commitment.
- Code of Ethics and Conduct: through which the following rules are adopted: (i) respect for the law; (ii) respect for persons and human rights; (iii) competition law; (iv) fight against corruption; (v) selection of commercial agents based on a legitimate, useful service and founded on professional competence; (vi) prohibition of financing political activities; (vii) prevention of conflicts of interest; (viii) transparent and reliable communication; (ix) protection of assets; (x) communication systems for professional purposes; (xi) transparency and internal control; and (xii) financial operations in compliance with laws and regulations;
- Anti-Corruption Code of Conduct: through which answers are provided to the questions that Collaborators may ask themselves when faced with situations of risk of corruption.

c. Applicable legislation:

- The Rules of Conduct for Combating Extortion and Bribery published by the International Chamber of Commerce (the "Rules");
- General Law on Administrative Responsibilities (the "Anti-Corruption Law");
- Foreign Corrupt Practices Act (FCPA)²;

² The Foreign Corrupt Practices Act applies to American citizens or residents and subsidiaries of companies incorporated in the United States, regardless of where their operations and employees are located.

- The UK Bribery Act contains a series of rules that, in certain cases, allow the prosecution of people from other countries for acts committed abroad. It applies to foreign companies that carry out their activities, wholly or partly, in the United Kingdom³; and
- Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and modernization of economic life (known as the “Sapin II Law”). French judicial authorities may prosecute French citizens for offenses committed in France or abroad, foreigners for offenses committed in France or foreigners for offenses committed abroad, provided they habitually reside in France or carry out part of their professional activity in this country.

³ This is a UK law with extraterritorial reach that allows the authorities of that country to sanction acts of corruption committed by persons or companies that are outside its territory

D. IDENTIFICATION OF CORRUPTION RISKS IN OMA ACTIVITIES

OMA's main activity consists on the administration, operation, and management of 13 airports (the "Airports") that comprise the airport group. To this end, it must enter into and execute a series of contracts for the operation of the Airports and carry out certain processes before government authorities. Occasionally, these activities may give rise to situations in which Employees face a risk of corruption.

OMA employees are strictly prohibited from soliciting or proposing payment in kind or in cash of any amount to any individual, legal entity, or public servant in exchange for a favor or support in achieving an objective or benefit, whether or not it is for the benefit of OMA. If such a situation is verified, it will be reported through any of the means described in this Code.

Corruption exposes companies and their employees not only to criminal penalties, but also to civil and contractual consequences (termination of contracts, compensation to injured third parties, etc.).

Corruption is often accompanied by illegal behavior, such as, influence peddling, favoritism, presentation of inaccurate accounts, embezzlement of assets, abuse of authority, illicit enrichment, among others.

The following are some illustrative examples of activities that could lead to acts of corruption:

D.1. CELEBRATION OF CONTRACTS

- a. Form of corruption: attempting to favor the awarding of a contract to a third party.

Promise of undue advantage in favor of whoever awards the contract or participates in its awarding. This can materialize through the delivery of money; gifts (luxury items, hospitality expenses, children's school expenses, etc.); coverage of various expenses; promise of short- or long-term employment; hospitality expenses (leisure trips, invitations from friends, invitations exceeding 25 UMA's); sponsorship with advantageous effects for the third party responsible for awarding the contract. The beneficiary of the advantage may be a representative of a third party to whom the contract is awarded, an agent or a third party designated by him, and the promise can be disguised in a contract whose object appears lawful but which contemplates overvalued services.

It is important to emphasize that if a third party makes a promise or a delivery of money on behalf of OMA, the latter incurs liability to the third party, to OMA and personally.

- b. Form of corruption: to create a privileged situation.

There are several examples of these actions, such as influencing the decision-making process in resolving a dispute, or gaining an undue advantage from a judge, arbitrator, mediator, expert, or any other justice official, regardless of the name by which they are

identified.

- c. Form of corruption: accelerating actions or decisions of the Strategic Partner.

The form of corruption can be the promise of better conditions to a Strategic Partner, for example: expanding the scope of a contract, increasing the compensation, or generally granting an advantage to a Strategic Partner so that he can carry out his work diligently.

- d. Form of corruption: accelerating the obtaining of a resolution or conclusion of a procedure by an administrative authority, such as obtaining a permit, favorable tax treatment, mitigation of consequences of an infraction or any other type of favorable decision by a Public Servant.

It may consist of the promise, offering or delivery of money or any other gift to a Public Servant or to a third party, in exchange for said Public Servant performing or refraining from performing an act related to his functions or those of another Public Servant, with the purpose of obtaining or maintaining a benefit or advantage, regardless of the acceptance or receipt of the money or the result obtained.

E. RULES OF CONDUCT AND GUIDELINES

OMA Collaborators are prohibited from granting or receiving from third parties, either directly or indirectly and by any means, undue advantages of any kind in order to obtain or maintain a business transaction or favorable treatment therein.

OMA Collaborators will refrain from maintaining relationships with third parties that could create situations of dependency or compromise their integrity. They will also avoid exposing such situations to third parties whom they intend to convince or persuade to close a deal with OMA.

The following symbols will help OMA Collaborators assess risk in decision-making:



HIGHER RISK



POTENTIAL RISK

In general, all OMA employees who have any doubt about the conduct they should adopt must respect the rule of **transparency**, that is, not try to resolve the matter on their own; in case of doubt, they must report the conduct to their hierarchical superior or to the OMA General Counsel.

The following are some rules of conduct and recommendations to follow in the following risk situations:

E.1 RELATIONSHIPS WITH STRATEGIC PARTNERS IN THE FRAMEWORK OF PROCUREMENT.



The negotiation and execution of contracts must not give rise to behaviors or events that can be classified as active or passive corruption, or as complicity in influence peddling or favoritism.

No illegal payments, directly or indirectly, may be made to a representative of the Strategic Partner.

Rules of Conduct

Absolute respect for the prohibition against making any type of illegal payment in favor of a Strategic Partner, in the negotiation or execution of a contract. There are no exceptions to this rule, either by the OMA Collaborator's superior or by the OMA ethics department.

Guidelines

- Remember that a payment of this nature could expose the applicant, the OMA Collaborator and the company itself to serious penalties, especially of a criminal nature.
- Ask the author of said request to formulate their request officially, in writing, mentioning their identity, their request and the signature of the same by a legal representative, which should dissuade them from proceeding.
- Notify the Strategic Partner's manager, indicating that this request may jeopardize the project's development and reminding them of their obligation to end this practice.

Obligation to act with caution.

- OMA employees must remain vigilant and not endorse any illicit practices by Strategic Partners that may come to their attention.

E.2 CONTRACTING OF SERVICE PROVIDERS

The contracting of service providers must be carried out with reasonable diligence, commensurate with the nature of the service and its place of performance. This diligence refers to the integrity of the service provider, the legitimacy of the contract to be entered into, and the proportionality of the payment for the service.

While hiring service providers is common practice for carrying out certain services, it can also be used to conceal corruption. Excessive compensation or an inflated invoice can raise suspicions of a hidden commission, so it's advisable to remain especially alert.

Rules of Conduct**Guidelines**

The hiring of a service provider must be legitimate.

- The legitimacy of using a service provider implies that the services are legal and legitimate and correspond to a genuine need of OMA in accordance with its internal regulations and the price must be consistent with the services provided.

The conditions of intervention of the service provider should not raise suspicions about the honesty of OMA

- A prior and reasonable analysis of the service provider's reputation should be carried out, in accordance with the risk it may represent.
- The operating entity determines the methods for this analysis based on its risk map. It is recommended to systematically investigate new service providers.
- It is an essential requirement verify the financial and technical aptitude of the service provider to carry out the projected services, taking into account the market practices observed in the study of similar offers.
- The circumstances of hiring a service provider must be legitimate.
- The services entrusted to the service provider must be reflected in a contract approved by the Legal Department of OMA.

The contractual relationship must be clear

- The exact definition of the planned benefits.
- Reasonable remuneration consistent with the contracted service. Many technical services can be provided to overbilling for illicit purposes. OMA Collaborators must take care not to authorize these practices expressly or tacitly.
- Modalities of a transparent payment.

	<ul style="list-style-type: none">• A clear commitment to complying with OMA's ethical standards, along with a contract termination clause in the event of non-compliance with these rules by the service provider.• A documented record of the services provided.• A permanent right to audit the services provided.
Enhanced transparency	<ul style="list-style-type: none">• Depending on the risk involved, the hiring of a service provider by a Collaborator will be documented through a report addressed to their superior officer.• The remuneration of the service provider must be clearly and in detail stated in the accounts of OMA

E.3 FACILITATION PAYMENTS

Facilitation payments are prohibited, except in the cases indicated below:



Facilitation payments consist of small commissions or gifts offered to public servants by private individuals or companies to incentivize them to fulfill their obligations expeditiously. (The "Facilitation Payments"). This practice creates a vicious cycle that undermines OMA's ethical values, potentially exposing it to increasingly frequent and burdensome demands. Therefore, facilitation payments are considered a form of corruption and are prohibited in many countries.

OMA is not required to make this type of payment to process administrative procedures that do not constitute preferential or improper treatment, but are simply the fulfillment of a job for which the State pays Public Servants.

Rules of Conduct**Guidelines**

If a Public Servant requests a Payment of Facilitation should be denied and explained to him:

Prohibition of facilitation payments

- That the ethical standards of the VINCI Group and OMA does not authorize him to access his request;
- That the request is illegal and that, according to the law, this act could expose the applicant, the Collaborator and OMA to serious sanctions, including criminal penalties;
- The administrative procedures you wish to have processed do not constitute preferential treatment but merely the fulfillment of a task for which the State compensates Public Servants. Should the Public Servant insist, they must be required to submit the request officially. Once obtained provide written proof of this request and notify your supervisor. OMA will take the necessary steps to obtain respect for their rights through legal means.

Exception: imminent risk to the safety of OMA and/or its employees.

Engaging the Strategic Partner

- Inform the Strategic Partner that any Facilitation Payment may jeopardize the development of the project and will result in the termination of the contract.
 - Inform the Strategic Partner that, in cases where administrative authorizations are required for the execution of the contract, they must commit to obtaining them without offering Facilitation Payments and must mention in the contracts the timeframes required to obtain the
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	<p>different authorizations administrative, taking into account possible time contingencies, so that the Strategic Partner can make provisions without incurring Facilitation Payments.</p>
<p>Transparency</p>	<ul style="list-style-type: none"> • Immediately report any difficulties to a higher-ranking official or to the Department responsible for ethical issues at OMA.

E.4 CORPORATE GIFTS AND INVITATIONS



Gifts⁴ may be offered or accepted provided that their value is symbolic or does not exceed 25 UMAs in force in Mexico City, and that their nature cannot call into question the honesty of the person giving the gift or the impartiality of who receives it. Giving corporate gifts is generally considered a courtesy and is a widespread practice, although it is recommended to act with caution to avoid conflicts of interest or being considered an act of corruption.

Rules of Conduct

Guidelines

<p>The applicable local law should permit the type of gift or invitation⁵ that is contemplated</p>	<ul style="list-style-type: none"> • Make sure that the delivery of the gift or invitation is not prohibited by law due to the recipient's professional status.
<p>The gift or invitation must comply with OMA's policy</p>	<ul style="list-style-type: none"> • In this matter, please adhere to this Code, the OMA Code of Ethics, and the VINCI Group Anti-Corruption Code of Conduct. VINCI Group and

⁴ Gift: This refers to any benefit in kind that can be considered a gratuity, such as the delivery of a material object or the payment of an expense on behalf of the recipient of the gift.

⁵ Invitation: This refers to any public relations activity intended to share a pleasant moment or event with the recipient, whether exclusively or partially for professional purposes. Invitations may consist of:

- A meal at a restaurant
- A show
- A trip

OMA entities may set limits per event and per time period, without prejudice to applicable law, and OMA Employees are obligated to comply with these limits.

The context and circumstances must be taken into account

- The gift or invitation should only constitute a general expression of esteem or gratitude.
- It should not be perceived as a reward in exchange for a benefit to the company.
- The value or repetition of the gift or invitation should not call into question:
 - the honesty of the one offering it;
 - the impartiality of the one who receives it;
 - to instill any suspicion, especially regarding conflicts of interest;
 - nor give rise to suspicion of covering up an act of corruption

Gifts and invitations are prohibited when OMA is about to enter into a contract with the entity to which the potential recipient belongs



Anti-corruption laws prohibit giving gifts to third parties with the objective of gaining an undue advantage or unjustifiably influencing any official action.

Any gift or invitation, unless its value is below the limits authorized in this Code and in the OMA and VINCI Group Code of Ethics, may only be made if the Collaborator has the prior authorization of the hierarchical superior.



The value of the gift or invitation should be symbolic, taking into account the circumstances.

It is wise to show discernment and good sense. The more expensive the gift or invitation, the more suspicious it will seem.

Avoid gifts and invitations that common sense might deem inappropriate.

<p>What to do in case of excessive or inappropriate demands</p>	<p>You have to deny it and explain:</p>
	<ul style="list-style-type: none">• That the ethical standards of the VINCI Group and OMA does not authorize you to access this request.• That according to current legislation, this act could constitute an illegal act that would expose the applicant, the Collaborator and OMA to serious sanctions, especially criminal ones.
<p>Invitations from representatives of Strategic Partners to meals must be related to professional activity.</p>	<p>During the meal, the conversation should revolve around professional topics.</p> <p>The cost of the meal will be that of an ordinary business meal in accordance with local regulations.</p>
<p>The meal should not include guests who are not directly linked to the professional activity.</p>	<p>There are two exceptions to this prohibition:</p> <ul style="list-style-type: none">• If the employee has prior authorization from their superior.• If there are special circumstances (celebration of a significant event, for example, in the development of a project).
	
<p>Invitations to events must be professional in nature. The OMA Collaborator who organized these events must participate</p>	<p>The topics covered must be related to professional activity. These may include, for example, invitations to trade fairs, seminars, conferences, or visits to professional facilities, which may or may not involve reasonable travel and accommodation expenses.</p> <p>Additionally, the event may include a moment of distraction or sightseeing, but this aspect must be insignificant compared to the purpose of the trip.</p>
<p>Trips may not include friends, parents,</p>	

<p>spouse, or children of the guest or other related parties</p> <p style="text-align: center;"></p>	<p>There is one exception to this prohibition:</p> <ul style="list-style-type: none"> • If the employee has prior authorization from their supervisor.
<p>Enhanced transparency</p>	<p>Any gift or invitation:</p> <ul style="list-style-type: none"> • Failure to exceed the permissible limit established in this Code and in the OMA and VINCI Group Code of Ethics shall result in a report from the Employee to their hierarchical superior and to the Department in charge of ethical matters at OMA. • It must be clearly and thoroughly recorded in OMA's accounting records.

E.5 POLITICAL CONTRIBUTIONS AND SPONSORSHIP.



Any contribution, whether in the form of Political Contributions⁶, Corporate Patronage⁷ or sponsorship⁸, must have the prior authorization of the Legal Department and the CEO of OMA. While these actions are legal in most countries, they may be questionable when linked to illicit considerations from which the company could benefit directly or indirectly (through another VINCI Group company and/or OMA).

In general, gifts or disbursements directed to public figures, even indirectly,

⁶ Political Contributions: These include, among others, gifts or donations intended for political parties, political or trade union organizations, political party leaders, political representatives or candidates for political or public office.

⁷ Corporate Patronage: This refers to the financial, expert or material support provided by a company, without expecting direct economic compensation, to an organization that carries out a non- profit activity, in order to support projects of general interest (art, culture, science, humanitarian and social projects, research, etc.).

⁸ Sponsorship: This is a communication technique that involves a company's financial and/or material contribution to a social, cultural, or sporting event, with the aim of obtaining a direct benefit: increased visibility of the sponsoring company's values and greater brand awareness. The sponsor's contribution is not a donation but a communication expense; the sponsor has a commercial intention and their action is self-serving.

carry particularly high risks and must be monitored very carefully.

Rules of Conduct

Guidelines

Any donation, patronage, or sponsorship must be lawful.	Donations must be made in accordance with the Federal Civil Code of Mexico ("Civil Code"), or its counterparts in the different States of the Mexican Republic.
Any donation, patronage, or sponsorship must be accommodated within the company's policy.	In this matter, adhere to this Code and OMA's Good Neighbor Program. The objective of the transaction must align with the company's communication strategy.
Any donation, patronage or sponsorship must have the prior authorization of the company's general management.	The Collaborator must report any gift, patronage, or sponsorship to their supervisor, who will in turn report the project to: <ul style="list-style-type: none">• CEO.• Legal Department.• Department in charge of ethical issues in your company.• Company's communications department in your company.
The objective pursued, both by the person offering the donation, patronage or sponsorship, and by the person requesting it, must be legitimate.	This Code prohibits offering donations, patronage, or sponsorship to third parties with the aim of gaining an undue advantage or unjustifiably influencing any type of official action. The circumstances under which a donation, patronage, or sponsorship is used, the amount of support or its repetition should not: <ul style="list-style-type: none">• Raise doubts about honesty of the person offering it.• Nor the impartiality of the one who receives it.• Nor to instill any kind of suspicion.

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- Nor should it give any suspicion that it is an attempt to cover up an act of corruption.

Special attention must also be paid to the context and circumstances: any donation, patronage or sponsorship should be avoided when the company is about to enter into a contract with the entity to which the applicant belongs.

Donations, patronage, or sponsorships should also not be perceived as a reward in exchange for hiring the company.

Enhanced transparency

Any donation, patronage or sponsorship must be formalized and documented through a contract approved by the OMA Legal Department, which must state the identity of the recipient and the intended use of the donation, patronage or sponsorship.

Any donation, patronage or sponsorship must be evaluated and monitored by the Collaborator under the supervision of their hierarchical superior and the OMA ethics department.

Any donation, patronage or sponsorship must be reported clearly and in detail in OMA's accounting records.

F. IMPLEMENTATION

I. FUNCTION OF OMA DIRECTIONS

Each OMA Directorate is responsible for ensuring the proper application of this Code. It is incumbent upon them to assess the corruption risks they face based on the country or countries in which they conduct their activities, the nature of those activities, and the contracting parties.

II. ROLE OF OMA COLLABORATORS

All OMA employees are required to respect and apply these rules in accordance with their roles and responsibilities. In case of doubt or difficulty regarding these rules and their application, each employee should notify their supervisor, the Legal Affairs Department, or the department responsible for ethical matters at OMA.

III. INTERNAL ALERT DEVICE

If an OMA Collaborator believes that a legal or regulatory provision or this Code is going to be breached or is being breached, they must inform their hierarchical superior or the Legal Affairs Department as soon as possible, or resort to OMA's professional alert system, respecting the rules of said system, the applicable law and their own company's rules.

Based on the above, in order to receive complaints about violations of this Code, OMA makes available to Collaborators a direct line called **OMA Listens**, at no cost to the complainant, which can be used anonymously, and which is available 24 hours a day, 365 days a year, either by dialing the telephone +52 55 7100 2193 PIN 2341 or by entering the following website: <http://omateescucha.integrityline.com>

IV. SANCTIONS

Any act that constitutes an infringement of this Code may give rise to disciplinary sanctions, and would constitute an offense that justifies the application of disciplinary sanctions, without prejudice to the legal actions that correspond to OMA.

Furthermore, any action that constitutes an infringement of the applicable laws and

regulations regarding the fight against corruption is liable to result in disciplinary and criminal sanctions for the Collaborator involved.

In accordance with applicable law, these sanctions could include the dismissal of the Collaborator for serious misconduct; without prejudice to the fact that non-compliance with the rules may be detected by OMA through internal controls.

Date of modification by the Audit Committee: October 20, 2025.

Board of Directors approval date: October 23, 2025.