

	CODE OF ETHICS
	Chairman of the Board Executive Chairman General Director Legal Management

Grupo Estrategia Política (GEP) recognizes that, in its professional actions, each of its collaborators has the duty to conduct themselves under the following principles and values:

DILIGENCE. Execute assignments promptly and with interest; knowledge and expertise.

PROBITY. The actions carried out by our collaborators must be motivated by reason, the desire to fully fulfill the duty without incurring in reprehensible acts or lack of professional ethics.

GOOD FAITH. Regardless of the expectations of clients or any other actor with whom GEP interacts, its collaborators will achieve professional objectives through means that do not represent deception or morally or ethically questionable trickery. They shall not obtain information by illegitimate means or as a result of misrepresentation, simulation or deception about the nature of the work or those involved in the performance of their duties.

TRUST AND INTEGRITY. It is the obligation of each collaborator not to disappoint the trust placed in him, as well as not to defend conflicting interests, whether his own or those of third parties.

ADHERENCE TO THE LEGAL FRAMEWORK. Respect the legal norms in force in the United Mexican States and those of the countries where the clients' companies reside, as well as those that govern the functioning of the Congress of the Union.

TRANSPARENCY AND ETHICS. Those collaborators who engage in lobbying must carry them out under strategies that contribute to the public decision-making process, that defend the interests of GEP's clients and, at the same time, contribute to the consolidation of Mexican democracy. In the same sense, they must handle with transparency and ethics before the authorities the nature of the work entrusted and the identity of the clients, without this principle affecting the confidentiality responsibilities subscribed.

CONFIDENTIALITY. Maintain the obligation of secrecy with third parties on the matters entrusted, unless express consent of the owner of the information.

TIMELY DISCLOSURE OF CONFLICTS OF INTEREST. To make known with opportunity and certainty to the clients any possibility of current or potential conflict of interest of those involved.

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GEP's principles and values in action

Article 1.- GEP's Integrity Policy consists of the Code of Ethics, the Conflict of Interest Prevention Policy and the other legal and administrative provisions determined by the Ethics Committee.

Article 2.- GEP expects its collaborators to comply with applicable laws and maintain the highest standards of conduct.

Article 3.- For the proper performance of its function, GEP collaborators must bear in mind that they fulfill a democratic and social function, so they must act in accordance with the principles and values declared in this Code: diligence, probity, good faith, trust and integrity, adherence to the legal framework, transparency and ethics, confidentiality and timely disclosure of conflicts of interest.

Article 4.- In the accomplishment of its duties, GEP is free to accept or reject the matter before it without the need to justify its decision, regardless of the claims of its prospective clients.

Article 5.- The GEP collaborator must not:

- i. Use, in his professional performance with GEP, privileged and confidential information and all that which he was obliged not to disclose in matters in which he has participated in past assignments.
- ii. Improperly take advantage of the information obtained during his time at GEP and use it in his favor in a new job in a public entity or government agency.
- iii. Assure the client the success of the matter, but only comment on their expectations regarding the entrusted matter.
- iv. Forward emails, messages or notes sent with confidential information by other people without the express consent of the owner of the information. In this sense, it must strictly adhere to what is established in GEP's confidentiality policy.

Article 6.- The GEP Collaborator must avoid incurring conflicts of interest, so he must know, master and train continuously in the contents of the Integrity Policy of the firm.

Article 7.- At the end of each matter, or the termination of any contract, GEP must deliver the client's own documentation, even if it is owed fees or expenses. The foregoing does not constitute a waiver of the right of the firm to request, by all legal means, payment of fees and rights not covered.

Article 8.- The GEP Collaborator must maintain secrecy regarding all the facts and news that he knows through his professional performance. The obligation to maintain secrecy includes disclosures made to it by customers, authorities and third parties that may affect the customer or GEP. This duty is permanent, it dies only in accordance with the rules and conditions established within the hiring process.

The GEP Partner will responsibly use the information and communication technology at its disposal, for this it will take extreme care in preserving the confidentiality of the information.

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Objective and scope of the Code of Ethics

Article 9.- This Code of Ethics applies to all collaborators of GEP (consultants, administrative staff, directors, managers, presidents or any person authorized to act on behalf of GEP, regardless of where they reside) and to all private bodies with whom it has commercial relations. Its main objective is to publicize the actions, policies and strategies undertaken by GEP to prevent and combat any act of corruption.

Article 10.- GEP's Code of Ethics applies to the company's business with private sector counterparts.

When the laws that regulate the cases set forth herein are stricter than this Code, GEP collaborators must comply with applicable laws.

Article 11.- GEP has a policy of zero tolerance towards any form of bribery or corrupt conduct, therefore, it prohibits its collaborators from soliciting, agreeing, receiving or accepting bribes, perks, facilitation payments or any other illegal or inappropriate incentive, benefit or advantage.

It is strictly forbidden to make contributions or donations to political campaigns, candidates for elected office or political parties on behalf of GEP, or its clients. Infringements of this provision will be sanctioned in accordance with the provisions of the respective regulations.

Article 12.- According to the national legal framework, GEP strictly prohibits giving, offering, promising or authorizing, directly or indirectly through third parties, any financial advantage or anything of value to any public official, with the intention or purpose of exerting inappropriate influence, inducing the recipient to violate his duties, securing an undue advantage for GEP or its client or unduly reward the recipient for past conduct. This prohibition includes payments to third parties, where it is known, or have reasons to know, that that third party will offer, use or promise, any part of the payment to bribe.

Article 13.- For the purposes of this Code of Conduct, "Public Official" means any person employed by the State, or by a government or decentralized unit thereof, whether elected or appointed, acting in that capacity, representing any level of government, federal or national, state or municipal; including but not limited to, to their legislative bodies, secretariats, judicial bodies or investigative agencies. As well as any member belonging to any political party or candidate for any position of popular election.

Article 14.- The mere fact of offering or insinuating an inappropriate gift or consideration constitutes a violation of this Code of Conduct and the Integrity Policy, even if the recipient has not accepted it.

Article 15.- GEP collaborators may not, on behalf of GEP, offer or give a gift, meal, entertainment invitation, travel expenses or other hospitality to a public official or any representative of any commercial counterparty, as an incentive or in exchange for or in reward for undue advantages, such as granting a permit, facilitate a procedure, modify or block a regulatory project, among others.

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Article 16.- GEP collaborators are prohibited from offering gifts to commercial counterparties that exceed the commercial value of two hundred and fifty US dollars quoted at the time of purchase of the gift. Nor can they offer or deliver more than one gift to the same person in a twelve-month period.

Article 17.- Meals for public officials may only be paid for and organized when the following is complied with:

- a. The meal was requested and financed by one of the clients and is intended to make known a position in relation to a public problem, public policy or some other relevant issue for the sector where the client works; or, the lunch was organized by GEP and aims to provide a space in which commercial ideas or topics of interest to the firm are exchanged.
- b. In both cases, the attendance of the guests will not be conditioned to resolve any issue under their responsibility in a specific sense and;
- c. It must always be notified, with documentary support to Legal Management -with a copy to the Executive Presidency and General Management- about the meaning, scope and name of the attendees to the event.

Receiving gifts

Article 18.- GEP collaborators are authorized to receive gifts from customers under the following assumptions:

- a. Cash gifts or cash equivalents (gift cards or certificates) are always prohibited;
- b. The commercial value of the gift does not exceed two hundred and fifty US dollars quoted at the time of receipt;
- c. It was notified, within forty-eight hours after receipt of the gift, to Legal Management. Within the notification that is sent, mention must be made of the name of the client who offered it, the approximate cost of the gift, the date of receipt, as well as a photographic support of the present.

In those cases, in which gifts are received or accepted without respecting the principles established in the Integrity Policy, Legal Management will inform the Ethics Committee who will determine what is appropriate.

Recruitment of staff free of conflicts of interest

Article 19.- It is forbidden to hire or bind a public official or former official, representative or former representative of a commercial counterparty, as well as their close relatives to exert undue influence over them, or in exchange for any inappropriate favor or benefit.

Article 20.- GEP may offer employment to a former public official or a former representative of a commercial counterparty, or to their close relatives, for legitimate commercial or labor purposes. In the same sense, GEP collaborators can leave the firm to accept a public position or some private

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responsibility provided that the corresponding legal framework is complied with and with what is established in the Integrity Policy.

Article 21.- The hiring of former public servants must be authorized by the Executive Presidency if it is for a managerial position or by the General Directorate in any other case. These contracts must not take advantage of the privileged information possessed by the former public servant, nor must they contravene the limits established by the authority and / or applicable legislation in the matter.

Training on the contents of the Integrity Policy

Article 22.- GEP collaborators must become familiar with the content of the Integrity Policy and the business actions that arise from it, as well as participate in courses and training sessions on it.

GEP declares to update the knowledge and skills of its collaborators in the field at least once a year.

New hires must be trained within the first seventy-two hours after entering the firm.

Distribution of responsibilities

Article 23.- Legal Management is responsible for the application and supervision of this policy, for this it will periodically evaluate its effectiveness and adopt the necessary measures to solve deficiencies.

It is the responsibility of immediate managers, supervisors, or contractors to enforce this Code of Ethics, lead by example and provide guidance to collaborators.

The Human Resources and Materials Management is responsible for ensuring that new collaborators are aware of GEP's integrity policy within the deadline established herein.

Whistleblowing system

Article 24.- Cases of non-compliance with this Code or GEP's Integrity Policy in general must be submitted to the Ethics Committee so that it can propose the applicable sanctions.

The Ethics Committee shall be composed of the Presidency of the Board, the Executive Presidency, the General Directorate and the Legal Department. The latter will come to the Committee as Technical Secretary: it will summon the parties, explain what happened, issue an opinion when requested and draw up the corresponding minutes. He shall not have the right to vote.

Throughout the process, it will be ensured that the person involved has the right to know what is imputed to him, to present his version of the facts and to offer evidence or considerations that support his claim.

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The solutions to the cases that are submitted to the consideration of the Ethics Committee will be taken unanimously and will be unassailable.

The sanctions that the Ethics Committee may apply will be specified within the Policy for the Prevention of Conflicts of Interest and may range from an Administrative Act, a pecuniary fine and even the termination of the collaboration contract, without prejudice to notification to the corresponding authorities when applicable.

Article 25.- It is the right of collaborators to report any breach of GEP's Integrity Policy by any of the following means:

- a) **Phone:** 555203 1300 ext. 286
- b) **Email address:** juridicogep@com.mx

GEP maintains a policy of non-retaliation towards whistleblowers, so the confidentiality of the complaint and the complainant will be taken care of at all times in any situation that results in a violation of the contents of the Integrity Policy.

For each complaint, an objective, detailed and fair investigation will be carried out before a sanction is applied. Each collaborator is expected to cooperate in the investigation.

CHAIRMAN OF THE BOARD

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GUSTAVO ALMARAZ MONTAÑO

EXECUTIVE CHAIRMAN

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GUSTAVO ALMARAZ PETRIE

GENERAL DIRECTOR

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ERIKA MARTINEZ MOTT

VERSION CONTROL

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ID	HOLDER	VALIDATION	VALIDATION DATE
1	Legal Management	Ethics Committee	July 2023

VERSION	DESCRIPTION OF THE CHANGE
1	Creation of the Code of Ethics, as part of the Integrity Policy, in accordance with the national legal framework and good practices.