

**CODE OF ETHICS AND  
CONDUCT FOR  
PARTNERS, SUPPLIERS  
AND CONTRACTORS  
GRUPO TRAXIÓN, S.A.B.  
DE C.V.**

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## 1. OBJECTIVE

The Code of Conduct for partners, suppliers and contractors (the “Code”) establishes uniform criteria that determine the ethical behavior required from all partners, suppliers and contractors with whom Grupo Traxion S.A.B. de C.V. (“Traxion”) maintains a relationship.

It establishes values, principles, standards and guidelines, ensuring compliance with ethical practices to which the Group is committed and which it extends to those who participate in the value chain.

Furthermore, it defines the behaviors that should be avoided in order to prevent conflict situations, and establishes the means whereby violations of the Code can be reported.

Our understanding of ethics connects to socially and environmentally responsible performance that safeguards human rights and contributes to sustainable development.

## 2. SCOPE

The Code includes:

- Those guidelines applicable to our partners, suppliers and/or contractors when interacting and carrying out their activities corresponding to our business, and;
- It is based on the Group’s internal Code of Ethics and other Traxion policies related to environmental, social and governance aspects. It is therefore oriented to our Mission, Vision and Values, and the Group’s track record in sustainability.

All guidelines set forth herein shall apply to partners, suppliers, contractors and their employees, as well as to parent, subsidiary or affiliated companies. We are aware of the various conditions that may arise in the legal, economic, social and environmental spheres.

Therefore, this Code establishes the minimum requirements that any of our partners, suppliers and contractors should meet in order to collaborate with Traxion.

## 3. REFERENCES

### 3.1. Internal

- Code of Ethics
- Anti-Corruption and Integrity Policy
- Related Party Transactions Policy

- Labor Relations Conflict of Interest Policy
- Compliance Policy
- Sustainability Policy and Stakeholder Engagement
- Environmental, climate change and biodiversity policy
- Occupational Health and Safety Policy
- Diversity and Inclusion Policy
- Protocol to prevent discrimination and deal with cases of violence, harassment and sexual harassment, as well as to eradicate forced and child labor and Policy for the Identification and Prevention of Psychosocial Risks.

### 3.2. External

- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Declaration on Fundamental Principles and Rights at Work of the International Labor Organization
- Principles of the United Nations Global Compact
- Sustainable Development Goals, within the United Nations 2030 Agenda.
- Paris Agreement on climate change.

## 4. TRAXIÓN'S VISION, MISSION AND VALUES

### Vision

To be the leading transportation and logistics company; generating value for our stakeholders; and committed to profitability, innovation and sustainability.

### Mission

To meet the needs of our clients with quality integrated logistics solutions; to develop and efficiently use our human and technological resources.

### Values

At Traxion, we believe that values are fundamental to the success of our employees, our clients and our business. While each person has his or her own, the following six values form the basis on which we want to shape the behavior of every member of our company.

- Vision
- Drive

- Strength
- Trust
- Teamwork.

## 5. LABOR

The Group asks its partners, suppliers and contractors to be guided in their performance by international agreements related to labor practices, particularly the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

### 5.1. Freedom of Association

The Group recognizes that our partners, suppliers and contractors, as well as their workers, may freely exercise their right to unionize, negotiate, promote and defend their interests while respecting Traxion's institutional framework, internal administration and image.

### 5.2. Forced Labor

Partners, suppliers and contractors must prohibit any form of forced or compulsory labor and any form of modern slavery with their employees, including those associated with situations of illegality of the worker's residence permit or other forms of coercion.

### 5.3. Child Labor

Traxion expects its partners, suppliers and contractors not to hire personnel who do not meet the minimum age for admission, in accordance with applicable law.

### 5.4. Discrimination

Ensuring equality of opportunity and treatment with respect to employment and occupation for employees of our partners, suppliers and contractors is fundamental to us. They must not discriminate on the basis of race, color, sex, sexual orientation, religion, political opinion, origin, nationality, social or any other grounds.

The above should be considered with regard to hiring, promotions, training, remuneration, benefits, as well as the rest of the processes and activities of the companies that act as partners, suppliers and/or contractors of the Group.

### 5.5. Remuneration and Working Hours

Partners, suppliers and contractors must ensure that their employees work in compliance with all applicable laws and mandatory industry standards regarding working hours, compensation and overtime.

With respect to remuneration, partners, suppliers and contractors are required to comply with the minimum legal requirements, as well as the regulatory provisions related to overtime and welfare.

Suppliers are encouraged to have mediation measures that favor work-life balance.

### 5.6. Training

Partners, suppliers and contractors are encouraged to promote training and development opportunities for their employees to improve their technical skills, knowledge and competencies, as well as to promote career development.

## 6. OCCUPATIONAL HEALTH AND SAFETY

The Group expects its partners, suppliers and contractors to make it a priority to maintain work areas, machinery, equipment and processes in a safe manner and without presenting health risks to its employees.

Adequate conditions must exist within the facilities to reduce possible health and safety risks, such as: availability of drinking water, sanitation, adequate ventilation, temperature and lighting.

In addition, it must provide timely and proper maintenance of machinery and work equipment to avoid accidents.

They are required to have identified the potential risks and emergencies that may occur in their workplaces, as well as to have prevention and response plans in place.

Partners, suppliers and contractors must provide appropriate training to ensure the health and safety of their employees.

## 7. INTEGRAL ASPECT OF SUSTAINABILITY

As Traxion has a Sustainability Policy and a holistic approach to its critical issues related to the environment, social performance and corporate governance, its suppliers are expected to have a similar policy and approach.

We encourage them to adopt measures to mitigate and control their impact on the environment, assuming their responsibility and commitment to employees, communities and the environment.

On the other hand, compliance by partners, suppliers and contractors with the laws applicable to them in any subject matter is required in all cases.

## 8. ENVIRONMENTAL PERFORMANCE

Regarding the environment, it is connected to ethical management, based on a responsible conduct that considers: The sustainable use of resources (including water and energy), reduction of emissions and waste generation, and safeguarding biodiversity.

Initiatives related to circular economy, reduction of the contribution to climate change and development of environmental awareness.

As a basis, partners, suppliers and contractors are in any case required to comply with the environmental laws applicable to them.

### 8.1. Resource Efficiency

Partners, suppliers and contractors are encouraged to regularly identify opportunities for efficient use of materials, water and energy, especially those required for Traxion-related activities.

This includes, but is not limited to: revision of processes, renewal of machinery and development and/or updating of infrastructure.

### 8.2. Emissions and waste reduction

It is recommended that partners, suppliers and/or contractors, together with resource efficiency measures, seek options for renewable energy sources, either their own or from third parties.

Moreover, it is recommended that Greenhouse Gas (GHG) Emission reduction targets be set.

Likewise, it is recommended that in addition to working to reduce the use of materials, measures be taken to collect, reuse and/or recycle waste, especially waste generated in activities related to Traxion.

### 8.3. Safeguarding biodiversity

Partners, suppliers and contractors are encouraged to analyze whether their activities generate risks to biodiversity. If so, they should develop prevention and mitigation initiatives.

### 8.4. Environmental awareness

Suppliers are required to raise awareness among their employees on good environmental practices and the importance of protecting the environment.

## 9. CONFLICT OF INTEREST

Partners, suppliers and contractors are required to inform Traxion of any situation in which a particular interest is reflected on the part of the Group's officers or employees, and through which they could obtain an economic benefit or benefit in kind from the commercial relationship generated between the parties.

## 10. GIFTS AND HOSPITALITY

Gifts or hospitality should always be consistent with accepted business practices and never be necessary to do business. They should not have a negative impact on the companies or individuals involved. Gifts or hospitality should be disclosed to the relevant supervisors; and, also make reference to them as a token of gratitude.

## 11. ANTI-BRIBERY AND ANTI-CORRUPTION

Doing business and acting with integrity is part of the Traxion philosophy. Partners, suppliers and/or contractors shall not accept or compromise any form of compensation to influence decisions pertaining to our business. Likewise, any person who carries out any bribery or extortion practice with the Group's employees or with whoever carries out operations will be penalized.

## 12. ANTI-TRUST

In our commitment to promote ethical and responsible business practices, we categorically reject any anti-trust practices. Therefore, partners, suppliers and contractors are expected to respect free trade practices and not to engage in actions that distort the market in bad faith.

## 13. PROTECTION OF INFORMATION

Traxion expects its partners, suppliers and contractors to safeguard and protect all information and intellectual property they obtain from the performance of business or services rendered.

They shall not publish or disclose any information obtained from the Group to any member of the public, such as the press, official organisms or any other person without prior authorization.

## 14. QUALITY AND SAFETY

Partners, suppliers and contractors must comply in relation to the products and services provided to Traxion with the standards and/or quality levels, delivery



times and prices and/or remuneration established in the contracts or service orders, unless modified by agreement of the parties.

Special attention is required to those conditions that could affect the safety of Traxion's employees and clients.

## 15. EVALUATION AND AUDIT

We reserve the right to request that partners, suppliers and contractors conduct self-assessments of their performance in relation to the topics covered hereby.

Similarly, Traxion may be required to conduct audits in the workplaces of our partners, suppliers and contractors directly with our own personnel or contracted to third parties, with prior notice and to verify compliance herewith.

Suppliers, partners and contractors are expected to make their best effort to comply with all audit requirements.

The costs of audits may initially be covered by Traxion. However, if the audit findings show any non-compliance with the Code of Ethics and Conduct by the relevant partner, supplier or contractor, further audit costs, including review and implementation of corrective actions, will be borne by them.

We also reserve the right to take further action as necessary, including the potential termination of any contract or business relationship with the partner, supplier or contractor in the event of non-compliance herewith.

## 16. COMPLAINTS AND REPORTS

Any partner, supplier or contractor who suspects a breach of this Code of Conduct or a violation of the regulations or laws applicable to his or her company must report it.

It will be necessary to communicate it immediately to Traxion, being a confidential report through:

Traxion Line: 01 800 6078 737 and/or [contacto@traxion.global](mailto:contacto@traxion.global).

## 17. COMPLIANCE

Partners, suppliers and contractors who wish to do business with Traxion must have received, read and understand this Code. It is their responsibility and commitment that their conduct as a partner, supplier or contractor complies at all times with the rules and policies set forth herein, as well as any other policy issued by Traxion or any of its subsidiaries, which is in the public domain, or

has been made known to the partner, supplier or contractor.

## 18. TITLE/LIABILITY

The Compliance Officer is the assigned titleholder of this Code and is primarily responsible for its content, updating and requesting approval from the Corporate Legal Department.

## 19. EXHIBITS

Statement of Third Party Interests FCU-TX-120.