

PROTOCOL TO PREVENT DISCRIMINATION AND ADDRESS CASES OF VIOLENCE, WORKPLACE HARASSMENT, AND SEXUAL HARASSMENT, AND TO ERADICATE FORCED AND CHILD LABOR; AND POLICY TO IDENTIFY AND PREVENT PSYCHOSOCIAL RISKS.

1. INTRODUCTION

This document has been prepared to prevent discrimination and response to cases of violence and bullying or sexual harassment, as well as to eradicate forced and child labor in accordance with Article 132, section XXXI of the Federal Labor Law and to comply with the obligations established in Mexican Official Standard 035-STPS-2018 for the Identification, Analysis and Prevention of Psychosocial Risk Factors in the Workplace.

2. OBJECTIVE

Establish the standards, objectives, actions and procedures to be followed in the event of a possible situation of discrimination, workplace harassment or mobbing, violence and/or sexual harassment, forced labor and/or child labor, in order to contribute to its prevention, detection and timely eradication, as well as to identify and channel to treatment those employees subject to a severe traumatic event.

It also seeks to contribute to a favorable organizational environment and provide employees with adequate communication and reporting mechanisms to report concerns, ideas, suggestions, questions and promote problem solving in the workplace.

3. SCOPE

The protocol is of general observance and mandatory for employees at all hierarchical levels who render their services in the Group and its Subsidiaries.

4. DEFINITIONS

Term	Description
a. Traxión or Company	The Corporate HQ and all the Companies, Subsidiaries or Business Units that are part of the Group.
b. Severe traumatic event	An event experienced during or in connection with work that is characterized by the occurrence of death or that represents a real danger to the physical integrity of one or more persons and that may generate post-traumatic stress disorder for the person who suffers or witnesses it. Some examples are explosions, collapses, major fires, serious or fatal accidents, violent assaults, kidnappings and homicides, among others.
c. Sexual harassment	It is any form of violence in which, although there is no subordination, there is an abusive exercise of power that leads to a state of defenselessness and risk for the victim, regardless of whether it is

Term	Description
	carried out in one or several events, through unwanted physical, verbal, nonverbal or visual conduct of a sexual nature.
d. Social support	Actions to improve social relations at work that promote mutual support in solving work-related problems between workers, supervisors and/or subordinates. Examples of actions to provide practical and timely social support in the workplace include: strengthening the supervisor-worker relationship; encouraging mutual assistance among workers; promoting cultural and sports activities; and providing direct assistance when necessary, among others.
e. Protected categories	Ethnic or national origin, skin color, culture, sex, gender, age, disabilities, social, economic, health or legal status, religion, physical appearance, genetic characteristics, immigration status, pregnancy, language, opinions, sexual preferences, political identity or affiliation, marital status, family situation, family responsibilities, language, criminal record and any other established by applicable federal, state or local legislation.
f. Discrimination	Any distinction, exclusion, restriction or preference which, by act or omission, whether intended or not, is not objective, rational or proportional and has the purpose or effect of impairing, restricting, preventing, impeding, curtailing or nullifying the recognition, enjoyment or exercise of human rights and freedoms, when based on one or more of the Protected Categories.
g. Employee	Traxión employee or collaborator.
h. Psychosocial risk factors	Those that can cause non-organic anxiety disorders of the sleep-wake cycle and severe and adaptive stress, derived from the nature of the job functions, the type of workday and exposure to severe traumatic events or acts of labor violence to the worker, by the work developed. It includes unsafe hazardous conditions in the work environment, workloads when they exceed the worker's capacity, lack of control over the work, possibility of influencing the organization and development of the work when the process allows it, working hours longer than those set forth in the LFT, shift rotation that includes night shift and night shift without recovery and rest periods, interference in the work-family relationship and negative leadership and negative relationships.
i. Bullying or mobbing.	It is a conduct that is presented with the objective of intimidating, overshadowing, intimidating or consuming the victim emotionally or intellectually, with a view to exclude him/her from the organization or to satisfy the need, usually presented by the harasser, to attack or control or destroy; It is presented, systemically, from a series of hostile acts or behaviors towards one of the members of the labor relationship, so that an isolated act cannot constitute harassment, given the lack of continuity in the aggression against an employee or the boss himself; the dynamics in the hostile conduct varies, in order to undermine their self-esteem, health, integrity, freedom or security, which aggravates by the vulnerability of the passive subject from which it starts. Disciplinary measures and feedback in the process of performance and productivity management do not constitute bullying or mobbing.
j. Law or LFT	Mexican Federal Labor Law.
k. Forced labor	Work that is performed involuntarily and under threat of any penalty. This refers to situations in which people are forced to work through the use of violence or intimidation, or by more subtle means such as debt

Term	Description
	manipulation, withholding of identity documents or threats of reporting to immigration authorities.
l. Child labor	Refers to any work or activity that deprives children of their childhood. These are activities that are detrimental to their physical and mental health, thus impeding their proper development. In Mexico, it is prohibited for children under the age of 15 to work.
m. Violence	Any conduct that threatens or violates the physical integrity of a person, his or her loved ones or belongings, regardless of the relationship of super-subordination between the persons involved.

5. OUR PEOPLE

As stated in the Company’s Code of Ethics, we recognize that our employees are our most valuable resource, and we value the contribution each employee makes and are committed to treating them with respect. Such respect includes preserving the confidentiality of employee and officer records, refraining from intruding on their privacy, and supporting their aspirations in the workplace to the fullest extent possible.

Our people are the basis of our growth and performance, and our priority is to provide them with an adequate and productive work environment, fostering collaboration and teamwork. In addition, individual development is fundamental for us, encouraging them to excel and achieve their objectives and goals personally and professionally.

6. FAVORABLE ORGANIZATIONAL ENVIRONMENT

The Company encourages a work environment where the employees’ sense of belonging to the organization is promoted, so that all employees are properly trained for the correct and safe performance of their tasks and duties. The Company has adequate job descriptions with a precise definition of each employee’s responsibilities and encourages proactive participation and communication among employees at all levels, proper distribution of workloads, with regular working hours, and has implemented a performance evaluation process.

In order to ensure the proper performance of our employees, we take great care of the different internal communication channels, in order to maintain a safe and efficient communication, in which employees feel free to express any concerns or to propose new ideas for our business. All internal communication is always done with due respect to avoid personal and professional conflicts that could undermine from the work of the Company and its employees.

7. NONDISCRIMINATION, BULLYING OR MOBBING

The Company confirms its commitment to provide a workplace free of discrimination, bullying and/or mobbing.

Employees have an obligation to treat co-workers, supervisors, customers, suppliers, as well as any other person with whom the employee has contact while performing his or her duties, on or off Company premises, in a fair and respectful manner. The employee's conduct must be appropriate at all times while performing his or her duties on or off the Company's premises.

When in the workplace, the Company will do everything in its power to protect its employees against workplace violence, sexual harassment, bullying or discrimination by any person.

The Company will not tolerate threats or acts of violence, whether psychological, physical or verbal, in the workplace. All persons in the workplace, whether employees or not, must refrain from any threat or act of violence.

The processes established herein must be followed to prevent, report, investigate and resolve any case of discrimination, bullying or sexual harassment, as well as all types of threats or acts of violence in the Company's facilities or outside them when they are related to the Company's business or have the possibility of affecting the normal development of the Company's operations.

8. SEXUAL HARASSMENT

The following are examples of conduct, including, but not limited to, conduct that may be considered sexual harassment:

- Lewd looks or offensive gestures with a sexual connotation, derogatory or demeaning remarks directed at persons of a particular gender or sexual orientation, or using such remarks to describe them;
- Visualization or dissemination by any means, of documents, photographs, images, caricatures, or any other documents that have sexual connotations, expressions, images or references;
- Unwanted sexual advances, invitations or propositions;
- Any intimation, invitation or proposition, whether implied or explicit, that could be construed to make employment, continued employment, position, compensation, possible promotion or any condition of employment contingent upon a condition of a sexual nature;
- Intrusive questions or comments about a person's private life;
- Non-consensual physical contact including touching and fondling, verbal abuse or threats of a sexual nature, indecent acts, sexual harassment or assault punishable under criminal law;
- Repetitive invitations to go out upon refusals by the passive subject.

Such behavior is unacceptable in the workplace and in other work-related settings, such as business trips and social events with employees (whether or not the social event is

sponsored by the Company). Such conduct by suppliers, visitors or customers of our Company will also not be tolerated and we are committed to investigating and correcting, without exception, any form of harassment that takes place in our Company.

We are committed to addressing such conduct effectively internally when our employees report such a problem to us. Accordingly, we need your cooperation in immediately reporting any conduct that you believe may be a form of harassment.

Violations of any of the guidelines in this protocol may result in disciplinary action, including termination with just cause and without liability to the Company in accordance with law.

9. WORKPLACE VIOLENCE

Employee safety is of paramount importance to the Company, and the Company has adopted a zero tolerance policy regarding workplace violence. Threats or acts of violence, including intimidation, bullying, physical or mental abuse and/or coercion, involving or affecting Company employees or occurring on Company premises will not be tolerated.

The prohibition against threats and acts of violence applies to all persons involved in the operation of the Company, including, but not limited to, Company employees and other personnel, consultants, contractors, customers, suppliers, visitors and anyone else on Company premises. Any violation of the guidelines of this protocol may result in disciplinary action, as previously disclosed, including termination for cause.

Workplace violence includes, but is not limited to, any conduct that is sufficiently severe, abusive or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends and/or property in such a way as to disrupt the conditions of employment or create a hostile, abusive or intimidating work environment for one or more teammates.

Examples of conduct that may be considered threats or acts of violence under this protocol include, but are not limited to: Harassment; Threat of physical contact directed toward another person; Threatening a person or their family, friends, associates or property with harm; Threatening telephone calls; Veiled threat of physical harm or similar intimidation; and/or promoting the inappropriate use of firearms or weapons of any kind.

Employees must help maintain a workplace free of violence. To do so, they should immediately report any incident that violates this protocol to a supervisor or manager.

10. ERADICATION OF FORCED AND CHILD LABOR

As a general rule, the Company will not hire underage employees. It is absolutely forbidden

for the Company to hire minors under 15 years of age, over this age and under 18 years of age who have not completed their compulsory education, except in exceptional cases approved by the corresponding authority, where, in its judgment, there is compatibility between studies and work.

To hire any employee under 18 years of age, the written authorization of the Human Capital and Legal department will be required. It is a fundamental obligation of employees over 15 and under 18 years of age to submit to the Company a medical certificate establishing their capabilities for work and shall be required to undergo the medical examinations required by the Ministry of Labor and Social Welfare, as provided by Article 174 of the Federal Labor Law, as well as the authorization of the persons who have parental authority over the minor, otherwise they may not be hired by the Company.

Likewise, the Company ratifies its commitment to promote, protect and respect the human rights of its employees, so under no circumstances will it carry out, or allow to be carried out, any activity in which subordinate personal work is performed without the employee's consent and/or under coercion, either to perform work related to the Company's operations or for purposes of sexual exploitation. By virtue of the foregoing, the Company will not tolerate, in any way, conduct relating to or resulting in forced labor, human trafficking and slavery-like practices in its daily operations, which will be considered as just cause for termination of the employment relationship without any liability for the Company, regardless of any criminal action or of any other nature that the Company decides to take against the offending employee.

11. PREVENTIVE MEASURES

The Company will take all necessary and appropriate measures to prevent any type or act of discrimination, violence, bullying or sexual harassment. Among the protective measures that the Company may take, at its sole discretion, are: policies, training programs, identification and analysis of psychosocial risk factors, installation and operation of closed-circuit cameras, inspections, inquiries, information and dissemination campaigns, medical examinations and psychological evaluations when necessary, implementation of disciplinary measures and the complaint investigation and response system described herein, as well as various initiatives aimed at preventing any act of discrimination, violence, sexual harassment or bullying. All employees of the Company shall actively participate in inquiries, courses, training and any other measures determined by the Company. In addition, employees agree to enter into settlement discussions with the Company in the event that it becomes necessary to transfer to another available position, if so determined by the Company, at its sole discretion.

12. RESPONSIBILITY OF MANAGERS OR SUPERVISORS

Any employee, especially supervisors or managers, who becomes aware of a situation of

violence, discrimination, sexual harassment or bullying, must take reasonable measures to put an end to such acts, specifically they must notify and report the aforementioned acts to the Human Capital representative, a Legal Department, Comptroller and/or Internal Audit representative, area managers or to the Whistleblower Hotline at 800-6078-737 and/or to the e-mail address contacto@traxion.global according to the procedure detailed below.

13. EMPLOYEE RESPONSIBILITIES AND OBLIGATIONS

All employees have an obligation to behave and conduct themselves in a respectful manner. Likewise, in accordance with the procedure detailed below, employees must notify a manager or supervisor or the Human Capital department, a Legal Department, Comptroller's Office and/or Internal Audit representative, area managers or the Whistleblower Hotline at 800-6078-737 and/or contacto@traxion.global if they witness or have knowledge of any conduct involving discrimination, violence, sexual harassment or bullying committed by any co-worker, supervisor, manager, customer, visitor or supplier of the Company against any person.

In addition, employees must cooperate in inquiries and proceedings conducted by the Company's Investigation Committee either on its own or through specialized third parties acting on its behalf, in order to determine a possible violation of Company policies or any other Company policy. Such cooperation includes, but is not limited to, spontaneous participation and disclosure of any information related to the investigation. Refusal to cooperate with the Company in inquiries relating to Company policies or withholding information will be considered unjustified disobedience to contracted work and may result in disciplinary action or termination for cause.

In order to maintain the integrity of the process and ensure the truthfulness of the participants, employees shall maintain confidentiality in the process throughout the investigation. Likewise, the results of the investigation shall be made known only to those persons who have a need to know and may be informed verbally or in writing as determined by the Company.

14. COMPLAINT PROCEDURE AND INVESTIGATIONS

14.1. Report

Any person who is the victim of an incident involving discrimination, violence, sexual harassment or bullying is encouraged to challenge the unwanted conduct or act in order to end it directly with the perpetrator.

The Company has an "open door" policy that gives employees the freedom to express their opinions or concerns without fear of retaliation. An employee or any person who is a victim of or becomes aware of an incident involving discrimination, violence, sexual

harassment or bullying should immediately report the conduct to his or her supervisor or manager, or to the Human Capital department, a Legal Department, Comptroller and/or Internal Audit representative, area managers or the Whistleblower Hotline at 800-6078-737 and/or contacto@traxion.global. Employees are not required to report a violation of this protocol and policies to their immediate supervisor if the employee participated in such conduct, has a close relationship with the offender, or if the employee does not feel comfortable discussing the matter with his or her immediate supervisor.

In the event that there is a risk or threat of imminent violence, serious harm or conduct that threatens the life or physical integrity of the victim, their family or close relatives, or their property, employees must immediately report this to 911, the local police or the competent authorities.

14.2. Investigation

The purpose of the investigation is to ensure whether or not the reported conduct took place and, if so, to take the necessary measures to stop and/or prevent any future incidents. The Company will determine which person or area will be appointed as a member of the Investigation Committee responsible for conducting any investigation, which may be specialized third parties outside the Company that are hired by the Company for such purposes.

The investigation shall be conducted in a prompt, fair and impartial manner. Whenever possible, all persons involved in the investigation (including the possible victim, perpetrator, and witnesses) shall be heard, and the representations of each shall be fairly evaluated. Investigations will be conducted as confidentially as possible and information related to the investigation will be shared only with those who should have knowledge thereof, unless disclosure is necessary to protect employees, continue the investigation or take corrective action.

When the Company concludes the investigation, both the person who filed the complaint and the person about whom the report was made will be informed of the findings of the investigation. To ensure the confidentiality and reputation of the persons involved, the Company shall have the discretion not to issue a written report and to only make reports verbally. The Company, at its sole discretion, may engage a specialized vendor to conduct the investigation, either in whole or in part.

In order to conduct a thorough investigation and to ensure the safety of the persons involved, it may be necessary for employees to take paid leave without this being considered a modification of working conditions, but as part of the process detailed in this protocol.

14.3. Searches, inspections and monitoring

Any investigation arising from a report of workplace violence, discrimination, bullying or sexual harassment may require an inspection of the employee's work area and/or property found in the workplace, including but not limited to lockers, computers, telephones, portfolios, briefcases, bags, text messages, emails, recordings, videos, instant messaging systems, among others, with or without prior notice.

14.4. Disciplinary measures

Once the investigation is completed, the Company will make a determination as soon as possible based on the severity of the misconduct. The Company will discipline employees who have violated Company policies. Depending on the seriousness of the conduct, facts and relevant circumstances examined in the investigation in accordance with the Federal Labor Law.

15. RETALIATION AND CONFIDENTIALITY

The Company will not tolerate retaliation against any person who, in good faith, reports any violation or potential violation of this protocol or policies or who cooperates in the investigation of such a report, which is also the obligation of all employees. To the extent permitted by law, the Company will keep the details of the report confidential, provided that such confidentiality permits a full and complete investigation of the facts.

Any employee may report or file a complaint or report discrimination, violence, sexual harassment or bullying in full confidentiality and without fear of retaliation or the threat of retaliation against them. No employee will be criticized or penalized in any way for reporting or filing a complaint about a situation covered by this protocol.

16. SUPPORT FOR EMPLOYEES AFFECTED BY DISCRIMINATION, VIOLENCE, SEXUAL HARASSMENT, BULLYING OR RETALIATION

The Human Capital, Legal, and/or Comptrollership departments are available to provide support to employees affected by discrimination, violence, bullying, sexual harassment or retaliation, or if they have suffered a severe traumatic event as defined herein, in order to make them feel more comfortable and safer in the work environment. The Company's assistance may include, but is not necessarily limited to, transferring or reassigning the employee to avoid future contact with employees who were subjected to traumatic events during or because of work, referring employees for care at a private or public social security institution, conducting medical examinations and psychological evaluations of the victim, either through the Mexican Social Security Institute or a private institution, all at the sole discretion of the Company.

17. ATTENDANCE AND WORKING DAYS

17.1. General Framework

Regular employee attendance at the Company is important to all of us and our success depends on working together and the absence of one person affects us all.

The Company expects all employees to report to work regularly at their assigned start time. When this is not possible, the Company expects the employee to communicate this in a timely manner to his or her supervisor or Human Capital representative.

Regular attendance is considered one of the Social Support measures that will reduce psychosocial risks and all managers, supervisors and employees should adhere to their scheduled shifts to minimize the need for overtime and ensure a fair distribution of workloads. Adhering to pre-established work shifts will also allow employees to have a balance between work and personal responsibilities.

17.2. Shifts

The work schedule of employees shall respect the maximum weekly working hours established in the LFT, and which shall be assigned in accordance with the needs of the Company to achieve the greatest use of human and material resources and to allow employees additional rest time in accordance with the second paragraph of Article 59 of the LFT. Employees shall have appropriate rest and meal periods as established by the Company and employees are required to enjoy such rest periods.

18. PERFORMANCE EVALUATION

Employees will ordinarily receive a performance evaluation at least once a year. The performance appraisal is a vehicle for the supervisor to discuss the employee's work and is a time to review strengths and point out ways to improve performance and an opportunity to discuss each employee's professional development.

Therefore, employees are encouraged to seek guidance from their managers and supervisors to ensure they understand their job expectations and request additional training if necessary.

19. JOB TITLES AND DESCRIPTIONS

Job titles and/or job descriptions have been established for each job and due to changes in job content, all job titles and/or job descriptions are subject to periodic evaluation and review. Employees are encouraged to seek assistance from their supervisors and managers if they have questions about job functions.

All employees, supervisors and managers will receive training and instruction in general and job-specific health and safety practices.

20. FINAL CONSIDERATIONS

Any employee who obtains a restraining or protective order against another person, or who is subject to a restraining or protective order, must immediately report it to Human Capital.

The Company will not tolerate any violation of Company policies, regardless of whether it occurs in the workplace, on Company premises, during business travel or any other event involving employees performing work activities. Likewise, the Company will not permit any act of retaliation against any Employee for making reports related to this protocol or for participating in an investigation regarding a possible violation of this protocol by another employee.

21. ACKNOWLEDGEMENT OF RECEIPT AND CONFIDENTIALITY

I acknowledge that I have received and read a copy of the protocol to prevent discrimination and response to cases of violence, bullying and sexual harassment, as well as to eradicate forced and child labor and policy for the identification and prevention of psychosocial risks of the Company.

I understand that this protocol, in addition to the Company's Code of Ethics, sets forth the terms and conditions of my employment with the Company, as well as my duties, responsibilities and obligations.

I agree to abide by and be bound by the rules, protocol and standards set forth herein and acknowledge that the Company reserves the right to revise, delete and add to the protocol for the benefit of its employees and the Company.

I have read and understand this document and agree to it.

EMPLOYEE'S NAME AND SIGNATURE

DATE RECEIVED