

**OCCUPATIONAL HEALTH
AND SAFETY POLICY
GRUPO TRAXIÓN, S.A.B.
DE C.V.**

May 2023

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1. INTRODUCTION

In the labor setting, the employees well-being may be affected by exposure to risks or hazardous conditions during the performance of their activities, which may result in work-related injuries or diseases that, in addition to causing harm to individuals, impact business results due to costs related to lost work time. To address this situation, at Grupo Traxión S.A.B. de C.V. (hereinafter “Traxión” or “The Group” or “The Company” or “The Corporation”) we establish the Occupational Health and Safety Policy, recognizing healthy and safe working conditions as a human right, to be facilitated through a focus on risk prevention and promotion of the health of our employees and related third parties.

2. OBJECTIVE

To develop an occupational health and safety management system based on the implementation of a comprehensive risk management and preventive medicine strategy that provides safe and healthy workplaces, improving employee performance.

3. SCOPE

This policy is applicable to all companies, affiliates and subsidiaries of Traxión and is mandatory for all levels of administrative and operational employees of the company; as well as, for related third parties that are within our facilities, and/or that have a contractual relationship with Traxion, such as visitors, contractors, vendors, candidates, clients, inplants, etc.

4. REFERENCES

4.1. Internal

- Code of Ethics.
- Sustainability Policy Grupo Traxión S.A.B. de C.V.
- Protocol and Policy to Prevent Discrimination, Violence, Workplace Harassment, Sexual Harassment, Forced and Child Labor and Psychosocial Risks.
- Crisis Management Manual.

4.2. External

- Federal Labor Law.
- General Health Law.
- Social Security Law.
- General Civil Protection Law.
- Federal Regulation on Occupational Health and Safety.
- ISO 45001: Occupational Health and Safety Management System.
- NOM-019-STPS-2011 Constitution, integration, organization and operation of health and safety commissions, and related standards.
- NOM-030-STPS-2009 Preventive occupational health and safety services and related standards.
- NOM-035-STPS-2018 Identification, analysis and prevention of psychosocial risks and favorable work environment.

5. DEFINITIONS

Term	Description
a. Unsafe acts	Actions carried out by the worker that involve an omission or violation of a work method or measure determined to be safe.
b. Unsafe condition	Those that derive from the non-observance or disregard of the measures determined as safe and that may lead to the occurrence of an incident or occupational disease.
c. Consultation	It is defined as seeking interdisciplinary opinions before making a decision.
d. Emergencies	Abnormal situation that requires immediate attention, as it may cause damage to the company and may cause excessive risk to the safety and integrity of a person or the population in general.
e. Occupational disease	Any pathological condition resulting from the continuous action of a cause that has its origin or reason in the work or in the environment in which the employee is required to render his services.
f. Incident	Sudden, unforeseen, undesired event that impacts the safety and/or health of workers or third parties. It may or may not occur simultaneously with an event that causes material damage.
g. Inplant	Any external person whose workplace is within the facilities of our company for an indefinite period of time.

Term	Description
h. Hierarchy of controls	Defines the prioritization of the implementation of controls according to the following: 1. Eliminate the hazard, 2. Substitute with less hazardous processes, operations, materials or equipment, 3. Use engineering controls and work reorganization, 4. Use administrative controls, including training, 5. Use appropriate personal protective equipment.
i. Injury and ill health	Adverse effect on a person's physical, mental or cognitive condition.
j. Preventive medicine	A set of medical actions and advice aimed at disease prevention.
k. Participation	Action and effect of involving multidisciplinary teams in decision making.
l. Hazard	Refers to the inherent characteristics of facilities, processes, machinery, equipment, tools and materials, which may cause an occupational incident or illness.
m. Health promotion	It is the process that allows people to increase control over their health, understanding health as a state of complete physical, mental and social well-being, and not only the absence of disease or illness.
n. Risk	An occupational risk is an event experienced in the workplace generated by the combination of the consequences of exposure to a hazard and the associated probability of its occurrence.
o. Psychosocial risks	These are those characteristics of working conditions that affect people's health through psychological and physiological mechanisms with the capacity to affect their development at work.
p. Occupational health	It is a multidisciplinary entity that focuses on achieving the most complete state of physical, mental and social well-being of workers in the performance of their work.
q. Safety	It is defined as the application of a set of knowledge and skills based on engineering, science, management, and the support of some legal regulations with the objective of anticipating, identifying and evaluating risks in order to take actions to eliminate or control risks to levels considered acceptable.
r. Third parties	Any external person, i.e., other than employees, who is on our premises, e.g., visitors, vendors, contractors, clients, etc.

6. ROLES AND RESPONSIBILITIES

6.1. Senior Management

To assume leadership and commitment for the prevention of work-related injuries and ill health, authorizes and monitors that the necessary resources are in place to establish, implement, maintain and improve the occupational health

and safety management system, in order to provide healthy and safe work environments in all work centers.

6.2. Corporate Human Capital Department

To establish the objectives to comply herewith and approve the **occupational health** strategy, ensuring that the necessary resources are available for its implementation, as well as verifying the effectiveness of the management system to achieve the expected results.

6.3. Corporate Operational Excellence Department

To establish the objectives to comply herewith and approve the **safety** strategy, ensuring that the necessary resources are available for its implementation, as well as verifying the effectiveness of the management system to achieve the expected results.

6.4. Corporate Sustainability Department

To identify requirements and recommendations from the market and Traxión's stakeholders on occupational health and safety issues in order to enrich the strategy and best practices implemented in the company.

6.5. Corporate Safety and Environment Area

To define and manage the **safety** strategy, as well as the relevant guidelines for its implementation in all the Group's business units.

6.6. Corporate Occupational Health Area

To define and manage the **occupational health** strategy, as well as the relevant guidelines for its implementation in all the Group's business units.

6.7. Occupational Health Responsibles in the Business Units

To execute the **occupational health** strategy defined by the Human Capital Corporate Direction, ensuring compliance with the management system through the application and monitoring of indicators, preventive and health promotion programs for employees to achieve the established objectives.

6.8. Safety Responsibles in the Business Units

To execute the **safety** strategy defined by the Corporate Department of Operational Excellence, ensuring compliance with the management system through the evaluation and control of risks to which employees are exposed during the execution of their work activities, as well as the monitoring of indicators for the achievement of the established objectives.

6.9. Employees

To comply with all policies, procedures and guidelines established in the occupational health and safety management system, actively participate in programs, campaigns and training that are developed, and report unsafe conditions and acts that may generate risks to the safety and health of employees or third parties.

To propose occupational health and safety training and education programs appropriate to their position.

7. POLICY

In Traxion Group we consider occupational health and safety as a priority to preserve the physical and mental integrity of our employees and third parties in the development of their activities and the achievement of business objectives, promoting the development of a culture of risk prevention, providing the necessary resources to create safe and healthy workplaces that allow compliance herewith, through the following commitments:

1. To permanently perform work activities in the safest way, implementing measures to eliminate hazards and minimize occupational health and safety risks.
2. To provide workplaces focused on the prevention of occupational incidents and illnesses.
3. To ensure compliance with legal, Federal, State and local requirements, as well as other applicable occupational health and safety requirements in force.
4. To promote consultation and participation of all employees and employee representatives in occupational health and safety programs, projects and activities.
5. To monitor our occupational health and safety performance against defined objectives and targets to drive continuous improvement.

8. GENERAL GUIDELINES

8.1. Principles

Traxión establishes the Occupational Health and Safety Policy to protect the life and health of our employees, promoting respect for human dignity and ensuring dignified, healthy and safe working conditions through the protection of all employees and third parties against occupational hazards, ensuring equitable treatment, without being subject to any type of discrimination or violence, in relation to their personal or cultural characteristics, their convictions, gender, sexual orientation or any other kind.

Our quest for safety and health is for all employees, with the commitment of all officers, directors and employees of the company, using all available resources in a timely, adequate and sufficient manner, to ensure the implementation of programs and projects on occupational health and safety, promoting a business model in which the employee and the community, participate and develop a sense of cooperation among all, without any discrimination.

8.2. Strategies and Lines of Action

- To have the human, financial, technological and training resources, as well as to define an organizational structure that allows the implementation of the occupational health and safety management system.
- To identify applicable legal requirements regarding occupational health and safety, as well as internal requirements at each work center and ensure compliance.
- To identify hazards and assess risks that may have an impact on the health and safety of employees and implement the necessary controls for their mitigation according to the hierarchy of controls.
- To develop and implement processes, procedures and guidelines based on applicable regulations and the best occupational health and safety practices in all work centers, according to their line of business, segment and particular needs.
- To develop and implement a permanent health surveillance program for carrying out the diagnosis, treatment and follow-up of occupational diseases, as well as the containment of general illnesses.
- To identify health problems and risks by carrying out entry and periodic medical examinations to determine the possible relationship between ill health and working conditions.
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- To define occupational health and safety indicators and monitor their performance periodically in all work centers.
- To encourage the active participation of employees in training, campaigns and other programs, as well as the reporting of unsafe acts and conditions to create a culture of risk prevention and maintain safe and healthy environments in the company.
- To ensure that all incidents are reported and investigated, as well as follow up on the implementation of the necessary actions to prevent recurrence and share lessons learned.
- To plan and execute drills to evaluate the established emergency plans, to ensure that the necessary resources and skills are in place to deal with emergencies in a timely and effective manner.

9. SANCTIONS

Traxión's employees who fail to comply herewith shall be subject to disciplinary measures determined by the Company's management, depending on the severity, which may be as follows:

1. Warning call.
2. Issuance of administrative record.
3. Suspension from work without pay.
4. Termination of employment agreement.
5. Criminal complaint or appropriate legal action.

In the event of non-compliance by authorized third parties that provide a good, service or have any type of interaction with Traxion and its Subsidiaries, the disciplinary measures that the Company's management considers appropriate in each case shall be applied, which may range from the imposition of economic sanctions, temporary or definitive bans and the corresponding legal actions.

10. LIABILITY / OWNERSHIP

The Corporate Occupational Health Area and the Corporate Safety and Environment Area, each in their relevant areas of responsibility, are the assigned owners of this policy and are mainly responsible for its content, updating and request for approval by Traxión's General Management.

11. EXHIBITS

- Exhibit 1: Occupational Health and Safety Organizational Chart.

Exhibit 1: Occupational Health and Safety Organizational Chart

