

**TRAXIÓN**

LIFE IN MOTION

**HUMAN RIGHTS POLICY  
GRUPO TRAXIÓN, S.A.B.  
DE C.V.**

July 2024

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## 1. OBJECTIVE

To establish the principles and guidelines for the promotion, respect and monitoring of human rights in all operations of Grupo Traxión S.A.B. de C.V. ("Traxion"), involving the stakeholders with whom it maintains a relationship and, seeking to contribute to the sustainable development objectives set forth by the United Nations.

## 2. SCOPE

This policy applies to all companies, affiliates and subsidiaries of Traxión and is mandatory for all officers, directors and employees of the company, as well as for third parties that have a contractual relationship with the company.

## 3. REFERENCES

### 3.1. Internal

- Code of Ethics.
- Code of Ethics and Conduct for Partners, Suppliers and Contractors.
- Sustainability and Stakeholder Engagement Policy.
- Diversity and Inclusion Policy.
- Protocol and Policy to Prevent Discrimination, Violence, Workplace Harassment, Sexual Harassment, Forced and Child Labor and Psychosocial Risks.
- Compliance Policy.
- Occupational Health and Safety Policy

### 3.2. External

- International Bill of Human Rights.
- International Covenant on Civil Rights and its two protocols.
- International Covenant on Economic, Social and Cultural Rights.
- Statements of the International Labor Organization.
- United Nations Guiding Principles on Business and Human Rights
- The Ten Principles of the United Nations Global Compact.
- Current regulations associated with the risks identified as part of the due diligence process.

## 4. DEFINITIONS

| Term  | Description  |
|---|--|
| <b>a. Harassment</b>                            | Behavior that presents itself with the objective of intimidating, overshadowing, frightening or consuming the victim emotionally or intellectually, with a view to exclude him/her from the organization or to satisfy the need, which is usually presented by the harasser. It occurs systemically, based on a series of hostile acts or behaviors towards one of the members of the employment relationship. |
| <b>b. Collective agreements</b>                 | Agreement entered into between the employees of a company or a labor sector and their employers. This agreement may regulate all aspects of the employment relationship, such as salaries, working hours, bonuses, etc.  |
| <b>c. Value chain</b>                           | A complete sequence of activities upstream (stakeholders providing value: suppliers, contractors and others) or downstream (stakeholders receiving value: clients and other users) that materialize in the form of products or services purchased or sold by the company.  |
| <b>d. Workplace</b>                             | All places such as buildings, premises, facilities, and areas where activities related to production, commercialization, transportation, and storage or the provision of services are carried out, or where people work who are subject to an employment relationship.   |
| <b>e. Due diligence respecting human rights</b> | Ongoing management that a company implements according to the industry in which it operates, its size, its operating environments, and other factors, to ensure that it respects human rights and is not party to human rights abuses. This involves "identifying, preventing, mitigating and accounting for" potential negative human rights impacts generated by the company.                                |
| <b>f. Human rights</b>                          | Those rights inherent to all human beings, without distinction of any condition; the universality is established from international law, to which is added its integration in national regulations and in guidelines of companies and social organizations.  |
| <b>g. Discrimination</b>                        | Actions of distinction, exclusion and restriction that with or without intention are carried out based on intolerance, rejection and ignorance and that result in hindering, belittling and restricting the value, equality and recognition of a person's human rights, all due to individual differences and features.  |
| <b>h. Diversity</b>                             | It is a value that recognizes the originality and plurality of identities within a group and the value they bring to the whole.  |
| <b>i. Stakeholders</b>                          | Any Group or individual that may affect or benefit or is affected or benefited by the operations of the organization.  |
| <b>j. Freedom of association</b>                | The right to join and form part of social groups in which they are represented, under a common objective.  |
| <b>k. Equitable remuneration</b>                | One in which employees receive the same remuneration for the same work or for work of equal value, without considering aspects of seniority. It seeks especially to avoid the occurrence of gender bias in the remuneration of men and women.  |

| Term                        | Description  |
|-----------------------------|--|
| <b>l. Forced labor</b>      | Such carried out involuntarily and under threat of penalty. 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 manipulation, withholding of identity documents or threats of report to the immigration authorities. |
| <b>m. Human trafficking</b> | Constitutes a modern form of slavery, including trafficking for sexual exploitation, forced labor, domestic servitude or other purposes.   |
| <b>n. Child labor</b>       | Any activity that deprives children of their childhood. These are activities that are detrimental to their physical and mental health, thus impeding their proper development.   |
| <b>o. Violence</b>          | 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. ROLES AND RESPONSIBILITIES

### 5.1. Executive Presidency and General Management

Compliance with the policy is the responsibility of the Executive Presidency and the General Management, with the support of the Sustainability Department.

### 5.2. Corporate Sustainability Management

- Follow up on the implementation hereof by employees.
- Regularly update the identification and prioritization of human rights risks in Traxión's activities and value chain, on which this policy is based.
- Together with the areas related to these risks, establish the measures that comprise the prevention and mitigation plans, which will be implemented by the different areas of the Group to which they correspond.
- Monitor the progress of the initiatives integrated into the prevention and mitigation plans, which are integrated into the Sustainability Strategy and its governance.
- Facilitate the connection with the members of the value chain, when they have to participate in said initiatives; likewise in case of the need to propose remediation actions in which they participate.
- Promote knowledge and awareness of human rights among employees, in collaboration with the Human Capital team.

### 5.3. Corporate Audit Management

- Attending to complaints received through the hotline, which may include possible human rights-related misconduct.
- Establish the necessary response measures in accordance with the offense, informing the Audit Committee. The latter is responsible for approving the measures in the most serious cases.

### 5.4. Corporate Human Capital Management

- Complement the Audit Directorate as a recipient of complaints, which it will bring to the attention of the latter.
- Participate in the design and implementation of training and awareness initiatives (e.g. campaigns), together with the Sustainability Department.

### 5.5. Corporate areas and Business Units areas

The corporate, as well as the administrative and operational teams in Traxión's Business Units are responsible for compliance herewith.

Its main activities include:

- Participate in the updating of due diligence, according to the periodicity we establish in the Group.
- Perform in accordance with our self-regulation, including this Policy, and actively promote this to all employees in their teams.
- Actively promote the implementation of the initiatives included in the prevention and mitigation plans.
- Participate in the implementation of remediation initiatives, if required.

The Legal Department and the Compliance Officer may receive reports of non-compliance, which must be brought to the attention of the Audit Department.

## 6. GUIDELINES

At Traxión we are committed to the promotion, respect and monitoring of human rights in our activities and those that occur in the value chain associated with our requirements.

Through the due diligence process, risks are identified and prioritized, and prevention and mitigation plans are drawn up, as well as remediation measures if necessary.

We reject in every way any practice that violates human rights: forced labor, child labor, human trafficking and discriminatory acts; we also promote respect for collective agreements, freedom of association, equitable remuneration, health and safety in operations and the welfare of people.

## 7. PRINCIPLES OF ACTION BY STAKEHOLDERS

### 7.1. Employees

- We safeguard the integrity of our employees and promote a culture based on respect, rejecting any form of discrimination, harassment or act of physical or psychological violence.
- We promote diversity and inclusion within the Group, generating contracting for people with disabilities and developing the talent of women for leadership positions, inter alia.
- Employees are offered opportunities for development without bias based on gender, age, ethnicity, among other individual features.
- At all times, employees are contracted in accordance with the law. Likewise, they are provided with their benefits in accordance with the law, although at Traxión we seek to complement them with other additional benefits that can be offered to our employees.
- All forms of exploitation, forced labor, human trafficking and child labor are prohibited.
- Employees are guaranteed freedom of association and the right to enter into collective bargaining agreements, as well as the free exercise of their individual rights and the privacy of their information.
- Based on policies and procedures, we promote safe workspaces, from training, awareness to monitoring of the condition of work centers, motor and transportation units, and other equipment. Employees are responsible for following the health and safety standards established by Traxión, as well as making good use of the facilities, their work tools and equipment.
- We promote a more holistic concept of health, focusing on the well-being of our employees, in aspects such as a culture of respect, professional development, and work-life balance, among others.

## 7.2. Operators

- We take special care to ensure that they comply with formal working conditions, subject to the law, in aspects such as contract signing, workload, road time, etc.
- We foster a culture of education and road safety, promoting the safety of operators and third parties that may be involved in vehicular accidents and incidents.
- We protect your integrity, providing technology that reduces the risk of theft, as well as strict security protocols, especially when operations are riskier (e.g. transportation of hazardous substances).

## 7.3. Suppliers and contractors

- We seek to maintain sustainable relationships over time with our supply chain, which in turn is aligned with our principles and values. We seek a mutual benefit that does not violate human rights.
- Suppliers and contractors must be familiar with and sign the Code of Ethics and Conduct for Suppliers, Partners and Contractors. This document is published in Traxión's official website ([traxion.global](https://traxion.global)).
- To reduce the risks of human rights impacts in their activities, we evaluate suppliers in relation to their compliance with laws and the adoption of good governance, social and environmental management practices. This includes the measures they have in place to prevent forced and child labor.
- Suppliers and contractors are expected to have and promote human rights policies and guidelines in accordance with their operations.

## 7.4. Environment and Community

- Care for the environment contributes to guaranteeing people's basic rights. The Group has specific policies for environmental protection and preservation.
- Strict safety guidelines are applied in operations to reduce the risk of accidents and incidents that could compromise the communities, including those related to hazardous substances.
- The social initiatives that are supported through the Traxión Foundation, recipient of the Group's grantees, will always be analyzed to avoid affecting human rights that are collateral effects of the social objectives sought.



## 7.5. Clients and passengers

- In relation to clients, we especially seek to safeguard the information they provide us with, in order to reduce the risk of misuse and/or theft. Everyone has the right to the protection of their data. This includes the users of the transportation units.
- We work on the prevention of any type of harassment in passenger mobility units, including the training of operators.

## 8. SANCTIONS

Traxión employees who fail to comply herewith will be subject to disciplinary measures as determined by Traxión and/or business unit management, which, depending on the severity, 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 Traxión and its business units, the disciplinary measures that the management of Traxión and/or its business units consider appropriate in each case shall be applied, which may range from the imposition of economic sanctions, temporary or definitive bans and the relevant legal actions.

## 9. LIABILITY / OWNERSHIP

The Sustainability Department is the assigned titleholder hereof and is the main responsible for its content, updating and request for approval by Traxión's General Management.

### 9.1. Approval

This policy was approved by the Company's Board of Directors at its meeting on July 19, 2024.

## 10. APPENDICES

- Does not apply.