

Code of Ethics of Grupo Cuprum

CONTENT

1 Message from the General Director	4	6 Personal Practices	16
		6.1 Up-Front Commitment Against Corruption	16
2 Introduction	6	6.2 Restrictions to Give or Receive Gifts, Courtesies, and Attentive Gestures	18
2.1 Values and Principles of Grupo Cuprum	6	6.3 Relations Between Persons	18
2.2 What is the Code of Ethics?	7	6.3.1 Responsible Development of the Identity and the Freedom of Expression	18
2.3 What is not the Code of Ethics?	7	6.3.2 Respect for Privacy and Personal Information	19
2.4 To Whom Does the Code of Ethics Apply?	8	6.3.3 Diversity, Inclusion, and Zero Tolerance Towards Discrimination	20
2.5 Special Responsibility for Directors, Managers, and Leaders	8	6.3.4 Zero Tolerance Towards Violence of Any Kind, Sexual Harassment, and Workplace Harassment	20
	10	6.4 Relationship with the Company	21
3 Reporting Procedure	10	6.4.1 Health and Work Safety	21
3.1 How to identify actions that violate the Code of Ethics	12	6.4.2 Work Quality and Excellence	22
3.2 How to Make a Report	12	6.4.3 Protection and Use of Company Property	23
3.3 Protection for the Reporter	13	6.4.4 Protection for the Company's Reputation and Image	24
3.3.1 Procedure of Investigation, Resolution, Report, and Monitoring	14	6.4.5 Conflict of Interest	25
	14	7 Relationship with our Communities and the Environment	26
4 Corporate Ethics Program	15	7.1 Dialogue and Resolution of Conflicts	26
	15	7.2 Environmental Impacts	26
5 Corporate Practices	15	7.3 Involvement with the Community	27
5.1 Responsibilities in the Ethics Code's Procedure			

1 MESSAGE FROM THE GENERAL DIRECTOR

4

It is a pleasure for me to present our renewed Code of Ethics. I am convinced that the success of the Grupo Cuprum depends on how we live our higher purpose and respect our values and principles. At our company, we want the people who work in it to develop not only professionally but also in the personal and working fields acting in an ethical manner to satisfy clients, suppliers, employees, shareholders, and the community around us as well as take care of the environment.

In the Group, we seek to be better, transcend, and remain in the long term through a conscious culture focused on customer satisfaction and the innovation of products and services. Maintaining high standards of performance, as we have done so far, is achieved by complying with the local laws and regulations of the countries where we operate since both elements fortify each other. This is why Grupo Cuprum always does business with strict adherence to ethics, truthfulness, and our organizational values. This commitment is complemented through the responsibility of our executives to maintain a transparent environment with open doors to allow every person to express any concern of integrity or a conflict of interest.

I invite you to read our Code of Ethics with attention and consult it often as a guide for action. It is important to report the behaviors that you observe that do not adhere to our code, policies, principles, or values through the means of contact indicated in this document.

The excellent reputation of the company and its permanence in the future is based on how each of us behaves. It is very important for all to preserve the good name of Grupo Cuprum.

We must recognize that working with honesty allows us to gain and reinforce the trust of all the interest groups we serve, which in the end translates and results into a successful business.

Feel welcome to always live and act with integrity!



Eugenio Clariond Rangel
General Director
Grupo Cuprum

5



2 INTRODUCTION

2.1 Values and Principles of Grupo Cuprum

The values **Grupo Cuprum** believes in are a fundamental part in the adoption and implementation of this Code of Ethics, and this reflects the expected behavior of the entire Cuprum community. Practicing them

> Integrity

"I do the right thing!":

it is the personal choice and the commitment to think, say, and act based on the principles and values of the company.

> Respect

"I value and consider!":

this is to recognize one's own value and that of others, considering dignity and the compliance with rules.

makes us colleagues, citizens, and people who are more aware of our surroundings. Through our daily actions and behavior, guided by the following **values**, we will give life to the Code of Ethics:

> Humility

"Goodbye ego":

it is to recognize one's own strengths and weaknesses, taking advantage of them to act for the common good.

> Unconditional Responsibility

"Make it yours!":

it is the commitment of a collaborator or organization to be accountable for their actions and be responsible for the results in a transparent manner.

Likewise, as an organization, we are convinced that the principles presented here must be present at all times as a priority and serve as a reference in all our interactions with our shareholders:

- 1) **Our highest priority** is the safety and well-being of our colleagues.
- 2) **We trust** our collaborators and empower them to create value.

- 3) **We meet** the current and future needs of our clients.
- 4) **We treat suppliers** as ethical and valuable business partners.
- 5) **We take care** of the community and the environment where we are present.
- 6) **We respect** the principles and think as business owners to generate superior and repeatable value.

2.2 What is the Code of Ethics?

It is the most important policy of Grupo Cuprum and the guiding principle of all the activities carried out by the company. It defines the behaviors that we expect from all the people that make up the organization, and it guides us concerning:

- 1) The responsibilities and commitments of the company, its directors, employees, and all other persons and entities that have business or institutional relationships with Grupo Cuprum
- 2) The way we relate as people
- 3) The way in which we commit ourselves to the company, its assets, and its objectives, and
- 4) The way we relate to our neighboring communities and how we represent the company in our personal lives.

The Code of Ethics is a guide that will allow us to generate a safe, inclusive, cordial, and productive work environment, as well as conduct ourselves responsibly as a company by complying with the laws and regulations wherever we do business. The goal is that no matter what our work is, we all feel satisfied with what we do and are happy to be part of Grupo Cuprum.

2.3 What is not the Code of Ethics?

The Code of Ethics cannot anticipate everything that will happen every day so we hope that we all use our common sense and stay informed by asking for help when we do not know what to do.

While the Code of Ethics is the most important corporate policy, it does not substitute other policies and guidelines that we must know and follow, nor does it replace existing laws, both at the local and federal level in Mexico and in other countries where we operate. Therefore, in addition to adopting this code, it is our responsibility to know the policies and corporate guidelines related to the activities we perform in the company.

« **The Code of Ethics** is a guide that will allow us to generate **a safe, inclusive, cordial, and productive work environment.**

2.4 To Whom Does the Code of Ethics Apply?

All persons who have an employment or business relationship with the company, which includes the Board of Directors and all the employees and workers, as well as any external personnel such as clients, suppliers, contractors and subcontractors, business representatives, and other persons representing Grupo Cuprum have the responsibility to know the Code of Ethics and conduct our actions according to what it indicates. It also applies to any external person who performs work within our facilities or who carries out any type of transaction or procedure with the company. All of them should familiarize themselves with this document and follow it while they are inside the facilities of the company or when representing it at an external forum. Likewise, it applies anywhere in Mexico and abroad where Grupo Cuprum has operations.

Due to this, we must comply with the Code of Ethics within and outside Grupo Cuprum.

This means that it does not apply only within our factories, offices, distribution centers, branches, or stores. It also applies:

- When traveling with vehicles belonging to the company;
- When making a visit or carrying out an installation for a client or supplier;

- When wearing uniforms or equipment with the corporate image of Grupo Cuprum, including appearing in photographs or videos posted on social networks;
- When visiting and carrying out procedures on behalf of the organization at government offices, banks, or other similar institutions;
- When making a business trip, especially with per diem and travel allowances provided by the company.

2.5 Special Responsibility for Directors, Managers, and Leaders

At Grupo Cuprum, we think that a managerial or high executive position implies greater responsibilities; therefore, those who occupy these positions should be an example to follow. That is why we hope that all personnel who have people under their charge will practice leadership based on ethical testimony and congruence. Managers, Directors, and Leaders have the obligation to protect their subordinates by not giving them instructions that violate the Code of Ethics and to guide them in case they have doubts about any personal conduct or behavior observed in another person.



3 REPORTING PROCEDURE

3.1 How to identify actions that violate the Code of Ethics

Following the Code of Ethics and complying with all that it indicates is only part of our responsibility. It is also our responsibility to ask for advice when we have any doubts and report non-compliance when we see that someone is acting against our ethics. To this end, various means were designed to

ask for help when someone witnesses something that they consider incorrect and also a procedure to report violations to this code, same that can be found in this document or in the Corporate Ethics Program that is explained later.

To know what to do, you have to follow these steps:

1.- How to know if something might not be ethical?

- > You consider it an improper action or situation or even know it is illegal.
- > It is an aggression against you or another person. It is something that bothers you personally or an invasion of your private life.
- > It puts our security or the safety of people outside the company at risk.
- > Information is omitted, hidden, or modified.
- > Misuse of the assets and resources of the company or causes damage to its image or reputation.
- > It is deceitful against our suppliers or clients, against the authorities, or against the company.
- > A provider, client, authority, or competitor asks you for something which is not right.
- > The neighboring communities, our facilities, society in general, or the environment are damaged.

2.- If you have questions, you can ask for help or advice under these options:



a) Consult, in detail, the sections of this code as well as the additional information sources to which it refers.



b) Talk to your superior (unless he/she is involved in the situation that concerns you) and if necessary talk to the highest authority to which you have access at the site.



c) Talk to the person responsible for Human Resources at your workplace or contact someone from the Ethics and Integrity Committee, whose contact information you will find in the Corporate Ethics Program section on the Intranet.



« It is also **our responsibility** to ask for advice when we have any doubts and report non-compliance when we see that **someone is acting against our ethics** *contra de la ética*.

3.2 How to Make a Report

Where and How

The following means of communication are the ways to make your complaint:

 Download the **APP: LETICA** (Available on the **App Store** and **Google Play**), followed by the company pseudonym: **grupocuprum** (Note: must be written in lowercase letters)

 Send an **EMAIL** to: **grupocuprum@letica.email**

 Visit our **WEBSITE**: **letica.mx/grupocuprum**

 Send **WHATSAPP** message: **81 1917 9005**

 Call the **HELP LINE 800 00 CUPRUM 800 00 CUPRUM (800 00 28778)**

 Write to the **INTEGRITY MAILBOX** (**www.cuprum.com/codigo-de-etica**).

All complaints made are received by the members of the Ethics and Integrity Committee.

Likewise, if you wish to report a case or situation directly, you can use the means proposed in item 2 of the "Reporting Procedure" section.

It is essential that at the moment of making a report, you provide all the details of the situation

that you are reporting and that you speak with total honesty and adherence to the truth. If you have evidence of the situation, it is ideal that you share them when you make your complaint.

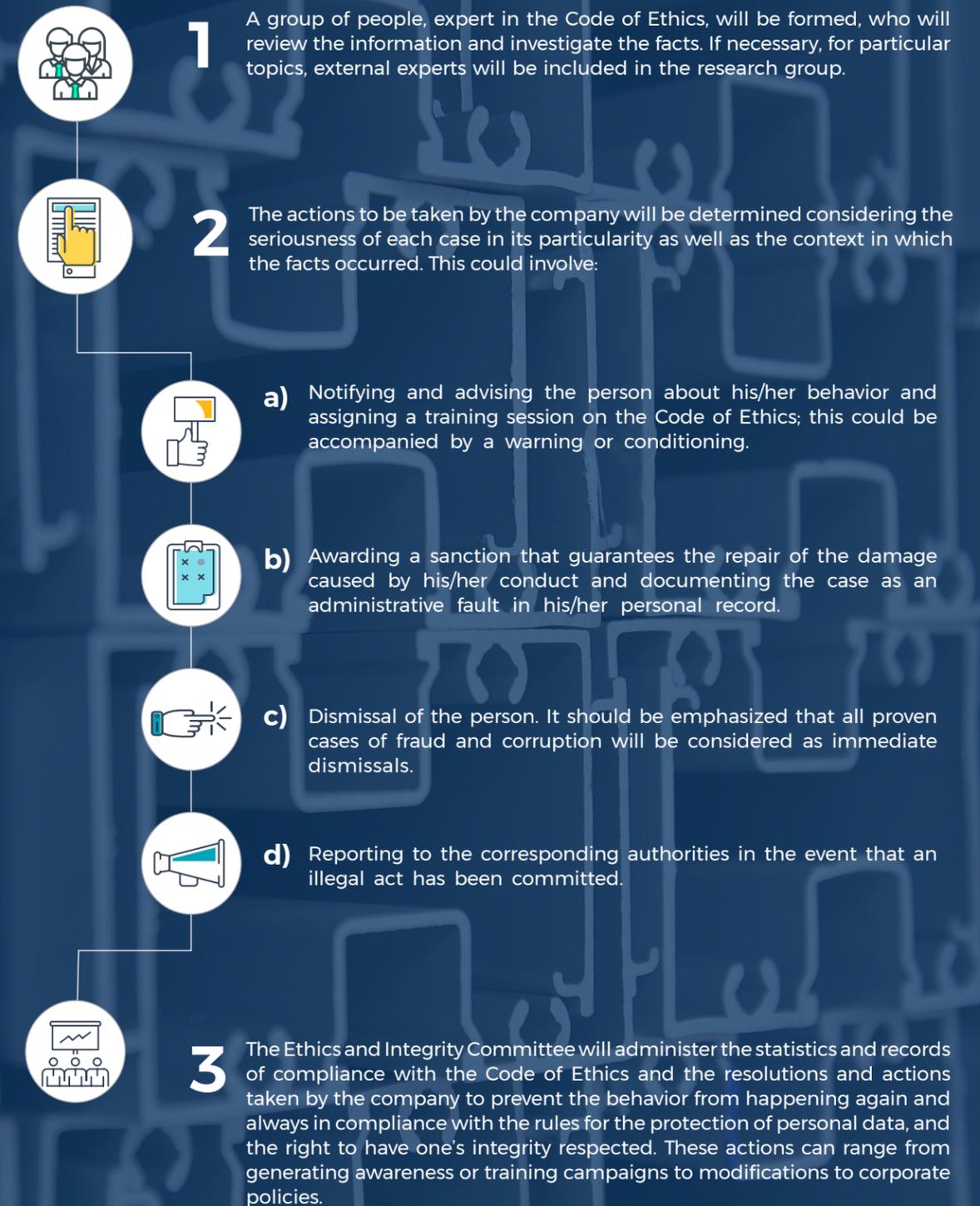
Even if you are not the person affected or who has raised the complaint, you should collaborate openly in any investigation of a problem when requested, as well as answer all questions with absolute truth and deliver the information that is requested with total transparency.

3.3 Protection for the Reporter

The complaints system of the Code of Ethics is designed so that you can make any query or report anonymously. However, in some cases, the best way to resolve the case you are reporting is that the members of the Ethics and Integrity Committee can talk to you directly. For this, we have adopted a policy of zero tolerance against reprisals for anyone who reports violations to this code. By the **zero tolerance policy**, for this and other issues, we refer to the taking of actions that ensure the prevention and elimination of behaviors such as reprisals, corruption, discrimination, and harassment against individuals who report under this Code of Ethics so to avoid these actions to become a recurring habit. When you make a report or report a situation, you contribute to the collaboration of becoming a more solid and reliable company, therefore the complaints system of the Code of Ethics protects you, keeping total confidentiality against any reprisal from the people involved in your report or by a superior or manager unless the complaint was made in bad faith or with malice.

3.3.1 Procedure of Investigation, Resolution, Report, and Monitoring

Once the report or claim has been made through the official channels, the following steps will be followed:



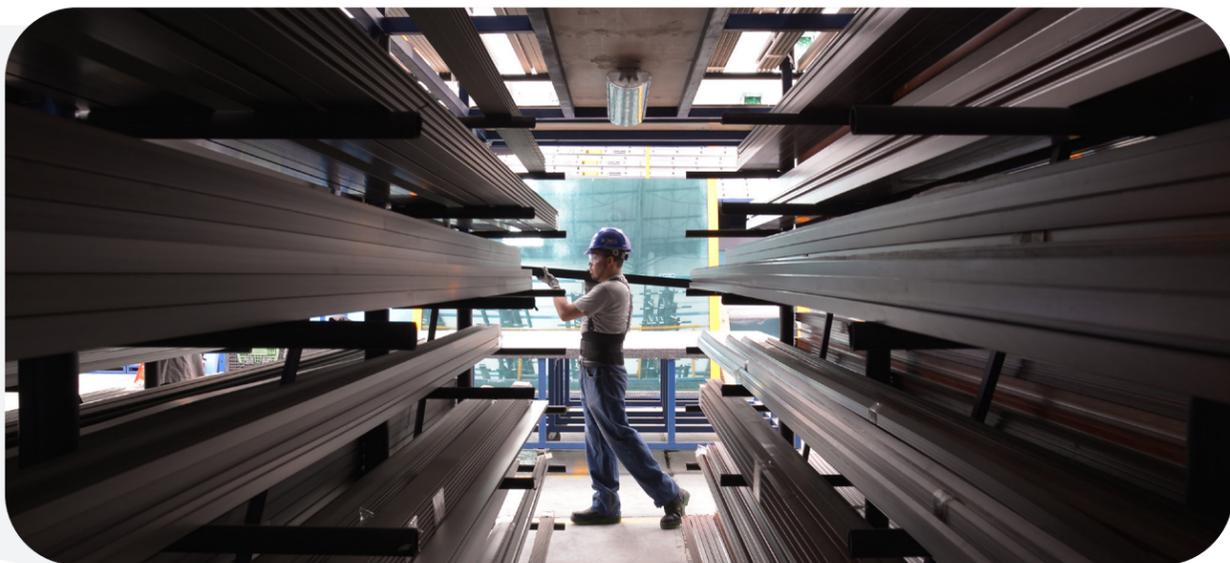
4 CORPORATE ETHICS PROGRAM

The Corporate Ethics Program brings together all the resources, tools, and policies that complement the implementation of this code. In the microsite hosted on the Intranet for this program, you will be able to find:

- > The downloadable version of the Code of Ethics which is also available on the company's website, as well as the document, "Special Responsibilities of the General Management and the Board of Directors".
- > The corporate and internal control policies which are key to specifying and detailing the expected behaviors as well as the guidelines to be followed.
- > The name and contact information of the members of the Ethics and Integrity Committee.

- > The link to the Integrity Mailbox to report cases and irregularities.
- > A package to deploy a face-to-face training session anywhere in the company.
- > The online course (e-learning) of the Code of Ethics so that the staff and employees of all levels of the company are fully aware of the information, inasmuch as to the Corporate Ethics Program as well as to the contents of the code.

With the establishment of this Program, Grupo Cuprum seeks to encourage a culture of ethics and legality among our collaborators, all committing ourselves to exercise and live this culture day to day.



5 CORPORATE PRACTICES

In Grupo Cuprum, we have a Corporate Governance model aligned with the best international practices. The Shareholders' Assembly delegates to our Board of Directors, the establishment of the strategies, and the monitoring of the management of the company. The General Directorate has the mandate of the Board of Directors to lead the organization to achieve the objectives of generating economic value, human development, respect for the environment, and compliance with the Code of Ethics agreed to with the Board itself. Those who make up the management team together with the General Director have the responsibility of making decisions aimed at achieving the aforementioned objectives. For more information on this section, consult the document, "Special Responsibilities of the General Directorate and the Board of Directors" on the Intranet.

5.1 Responsibilities in the Ethics Code's Procedure

It is the responsibility of the top management of Grupo Cuprum to guarantee that all persons related to the company have access to the Code of Ethics and all the tools for its application. This implies that:

- 1. We generate, in a timely and sufficient manner, all the necessary information so that people who are subject to compliance to the code are fully aware of their responsibilities and what would be the consequences if they did not comply with them.



- 2. We guarantee access to sufficient, timely, and culturally appropriate training programs so that all the people related to the company have the foremost knowledge to understand the Code of Ethics and understand what their responsibilities are;



- 3. We assume formal responsibilities related to the management and compliance with the Code of Ethics.

« In Grupo Cuprum, we have a **Corporate Governance** model aligned with the best international practices

6 PERSONAL PRACTICES

We wish that being part of this company will help us grow personally and professionally. That is why we work to guarantee a safe, dignified, and violence-free working environment that contributes to the personal development of those who work here. To achieve this, we all need to adopt a positive and constructive behavior that guides the way we relate as people, with the organization, and with our neighboring communities and society.

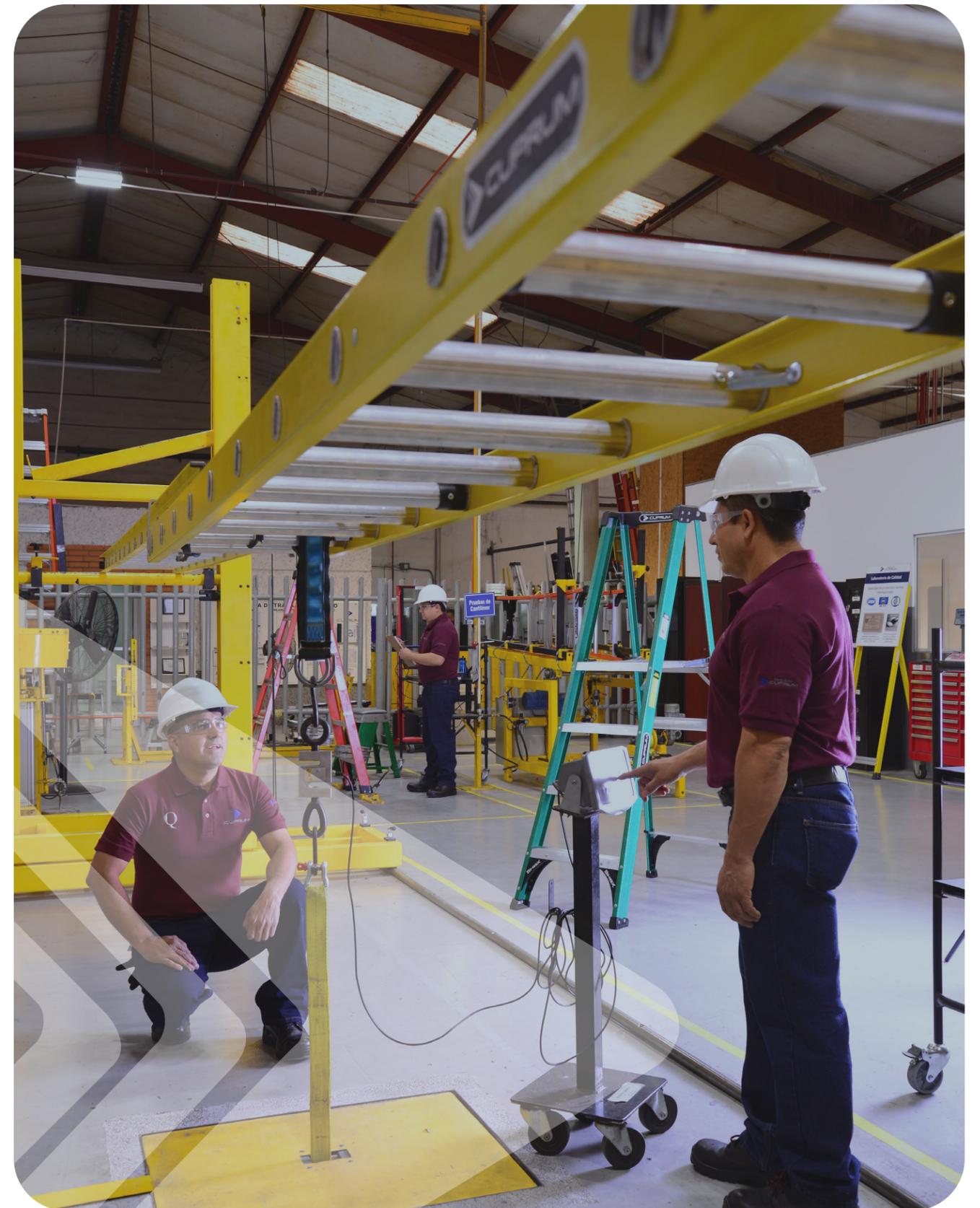
6.1 Up-Front Commitment Against Corruption

At Grupo Cuprum, we are committed to eliminate of any form of corruption, both in corporate decision making and in the daily behavior of all the people that make up our community. In addition, we belong to a large company, capable of competing in the market using its business arguments and its competitive advantages. That is why we do not have the need to receive illegal and unethical benefits to succeed in our businesses. We should not carry out or promote any unfair, illegal, or corrupt acts (such as bribery, extortion, and enticement, among others) when carrying out business activities on behalf of the company. This implies, among others to:

- Accept or offer improper payments, alter technical information or omit details of any kind when negotiating an agreement with suppliers or clients;

- Distribute false or confidential information of their own or of third parties or of any other kind that benefits the company;
- Agree on prices or specifications with the competition that can harm our clients or breach current legislation on economic competitiveness and antitrust matters in any country where we develop business activities;
- Accept or offer bribes to close contracts with the government or alter technical specifications or information of any kind concerning our products at the request of the corresponding authority;
- Participate in tenders for contracts with government or private actors when we know that we do not have the capacity to comply with the technical specifications, budgets, or project delivery times or for the simple act of benefiting or harming a competitor that is also participating in said tender.

We will protect, to the extent of our possibilities, any person who works in Grupo Cuprum and who, in the performance of his/her work activities, is the victim of any act of corruption or extortion by an authority or government actor, or by any person. This implies that no one will suffer any repercussions for not complying with their performance indicators when the causes of these are derived from not having accepted to commit acts of corruption.





6.2 Restrictions to Give or Receive Gifts, Courtesies, and Attentive Gestures

We are convinced that, in order to have cordial, transparent, and mutually beneficial business relationships, it is best to limit ourselves to the use of technical and economic arguments for making business decisions that seek business sustainability. For this reason, we prefer to avoid situations that could be misinterpreted or that could confuse the negotiations with our suppliers and business and institutional peers. This implies that in Grupo Cuprum, with each business relationship with external entities and once a year, gifts, invitations, or other courtesies and gestures with a value of up to \$ 75 USD or its equivalent in any foreign currency can be granted or accepted.

6.3 Relations Between Persons

A harmonious and safe environment is fundamental to guarantee labor productivity and the professional and human development of people. That is why we generate guidelines

based on the values and ethical principles that we need to adopt as a Cuprum community. Conscious of our multicultural conformation, the necessary measures will be taken so that ethical values and principles are culturally appropriate and ensure that all people have the elements to know and understand the cultural identity of their colleagues.

6.3.1 Responsible Development of the Identity and the Freedom of Expression

To generate an inclusive environment, we understand that we need to ensure that all people can freely express their individual identity. Grupo Cuprum does not intend to dictate how we should live our personal lives. However, to create a safe and friendly work environment, we need to exercise this right responsibly and with empathy. That is why we will avoid situations that put our security at risk or that generate conflicts between colleagues. As a general rule, all people linked to the company are committed to be considerate of others and always act in a way that does not physically, psychologically, or emotionally hurt others. That is why we reiterate the following:

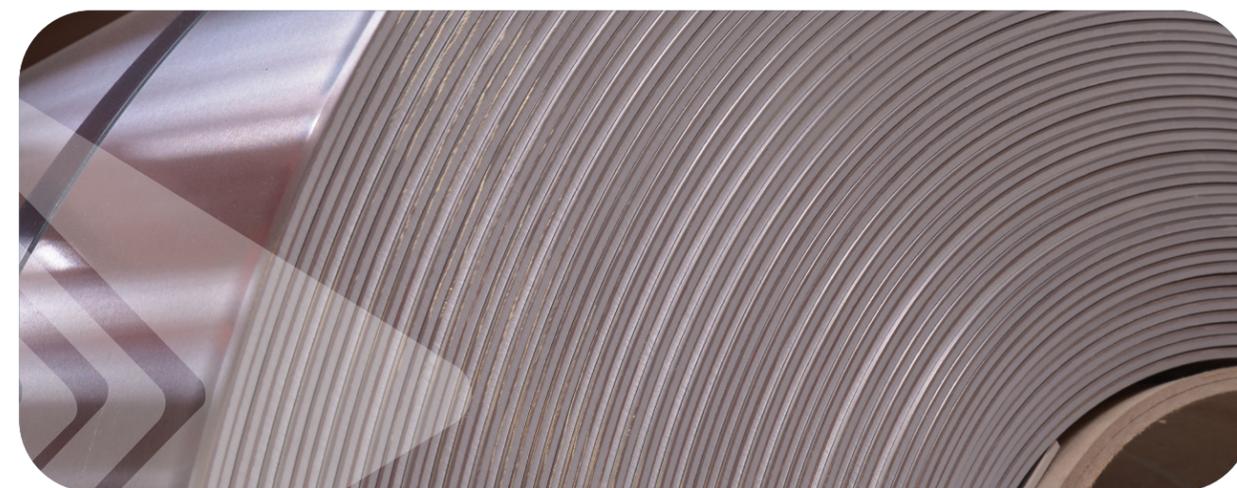
- Avoid the use of offensive language, insensitive comments, or have audible conversations on topics that may be uncomfortable to others.
- Do not enter the company's facilities or perform representation activities under the influence of substances, both medical and non-medical, which impair your cognitive and mobility coordination.
- Do not invite our colleagues, insistently and in unsolicited manner, to participate in multilevel or other business models.
- Do not invite our colleagues, insistently and in unsolicited manner, to participate in events or organizations of religious or political character, or of any other nature.
- Avoid sharing information or manifesting behaviors in social networks contrary to what is established in this code that could affect the company.

6.3.2 Respect for Privacy and Personal Information

The respect found among people is the basis of a harmonious and productive coexistence. A

fundamental part of respect is always taking into consideration the private life of our colleagues. For this we avoid, among other things to:

- Start or share gossip, rumors, or negative comments about other people and reveal information or opinions about the private life of our colleagues, clients, or suppliers without their consent;
- Invade the privacy of other people by accessing their belongings without authorization, such as cell phones, tablets, and other personal items. In respect to the computer and communication equipment, including the information stored in them, that have been assigned for work use and that are under the ownership of Grupo Cuprum, the company may have full access only under circumstances and cases that warrant it.
- Make use of the personal data of other people without their consent and without the necessary measures for their protection.
- Publish, disclose information, or tag images on social networks of other people in the company without their consent.





6.3.3 Diversity, Inclusion, and Zero Tolerance Towards Discrimination

The Cuprum community is made up of a great variety of national, ethnic, religious, sexual, and political identities, as well as other kind of differences. Therefore, we value diversity as one of our main strengths and reject any form of discrimination, whether it is due to age, sex, ethnic affiliation, political or religious beliefs, sexual preferences, appearance, socioeconomic status, physical or mental abilities, or any other reason. Likewise, we adopt a policy of zero tolerance against any act of discrimination from any person, regardless of their position in the company.

That is why we take the necessary measures so that our policies and procedures of hiring, development, and promotion are bias free, which unjustifiably affects any person.

6.3.4 Zero Tolerance Towards Violence of Any Kind, Sexual Harassment, and Workplace Harassment

Grupo Cuprum is committed to generating a workspace which is free of any type of violence. That is why there will be zero tolerance for acts that physically, psychologically, or emotionally attack people. Particular care will be taken to eradicate aggressive or violent behavior in the manner that people in managerial or board positions treat personnel under their supervision. We take a particularly firm stance against any act that violates the freedom, dignity, and physical

integrity of any person, inside or outside Grupo Cuprum facilities. This violence manifests itself in a multitude of behaviors that are normalized at the cultural level and that are seen as everyday forms of relationships. In Grupo Cuprum, we adopt a policy of zero tolerance against acts of labor harassment, sexual harassment, and all forms of violence against any person.

6.4 Relationship with the Company

Grupo Cuprum is committed to taking the necessary measures to generate an environment which is conducive to our professional and human development, and it also has all of us to protect the company and make it grow. To be clear about what is expected from us as people, we have this Code of Ethics and internal policies and procedures, which we must adopt to help our company achieve its objectives.

6.4.1 Health and Work Safety

Our first responsibility towards the company is to take care of ourselves and those who work with

us. No security measure is useful if we do not strictly follow or if we do not watch that other people carry it out. This is why we need to:

- Master the current safety guidelines in any area of the company and comply with them at all times.
- Keep the safety and work equipment under our responsibility in good condition.
- Immediately report any potential risk to the health and safety of our colleagues, visitors, suppliers, or neighbors, whether due to equipment flaw, waste management, emissions, hazardous substances, or by the unsafe actions or behavior of other people. In addition, if it is within our responsibilities, we need to repair any flaw as soon as possible that represents a risk to health, safety, and the environment.
- Be co-responsible in complying with the rules on the matter.



« **At Grupo Cuprum**, we have the opportunity to serve and provide attention to many people who trust our quality and the safety of our products



6.4.2 Work Quality and Excellence

At Grupo Cuprum, we have the opportunity to serve and provide attention to many people who trust our quality and the safety of our products so we must follow the guidelines and procedures by seeking excellence at all times. For this, we must commit to:

- > Follow the procedures, specifications, and controls to the letter with which we must design, manufacture, test, and distribute our products.
- > Work with cleanliness and concentration to minimize errors that require repeating or disposing of a product.
- > Adopt a philosophy of personal work based on continuous improvement and share with the management or direction of our area any idea that we know can help us work more efficiently, innovatively, and safely.
- > Pay special attention to the manner in which we report operational and financial information from an expense report or a request for material to a warehouse, up to an accounting report or sales report so that all the information we generate is accurate, clear, and true, using our official formats and procedures.

6.4.3 Protection and Use of Company Property

Just as top management is responsible for making decisions that protect the company's assets; it is also our responsibility to use the company's assets in a responsible manner. When we talk about the assets of the company, what do we mean and how can we take care of them?



PHYSICAL GOODS: use the facilities, equipment, machinery, and work vehicles correctly and only for the purposes assigned by the company. Know and follow the instructions, guidelines, and operating manuals for each equipment or work area that we use, perform the necessary preventive maintenance and repairs in a timely manner to prolong the useful life of the same.



WORK RESOURCES: use all raw materials, inventories, and economic resources efficiently and without waste to develop our work and never for personal benefit. Keep an accurate and adequate record of the use of resources. Follow the guidelines that regulate the use of per diem and travel expenses as well as for other activities that we carry out with company resources.



INFORMATION AND INTELLECTUAL PROPERTY: follow all security measures and information protection when we use the patents, trade secrets, designs, and brands of the company as well as the strategic and operational information that is generated as part of our business activities. Do not share this information with the competition or with people outside the company.



ELECTRONIC MEDIA AND EQUIPMENT: use electronic means such as e-mail, computer equipment, or cell phones assigned to us as well as the institutional internet and social networking pages, and avoid the use of these for personal matters. Do not share sensitive company information through these means. Likewise, avoid transmitting personal information or using our electronic means and equipment to respond to chains or share political, religious, or business messages from outside the organization. With respect to sharing information on the Internet or social networking pages of the company, attempt, as far as possible, to obtain the approval or authorization of the management area or address to which we belong.

6.4.4 Protection for the Company's Reputation and Image

All the people that are related to Grupo Cuprum are the first ambassadors and representatives of the company. With our work and with the way we act, we are in charge of the company's reputation. If our behavior is based on this code, we contribute to strengthen this reputation. Therefore, it is crucial that we:

- > Act by showing an ethical testimony in all aspects of our professional and personal lives;
- > Report any violation to the Code of Ethics through the appropriate channels;
- > Use our personal social networks responsibly, and avoid posting images on social networks where we appear representing the company or where our clients can be identified. If we want to share an image or message that we believe positively promotes the organization, first ask for the approval or authorization from management or the board to which we belong;
- > Avoid using our uniform or work equipment with the image of Grupo Cuprum or affiliates at political or religious events in such a manner that the company is not associated with our personal ideology;
- > Take care of the confidentiality of our clients and suppliers, ensuring that the information does not fall into the hands of people who do not have authorization to use it;
- > Always work with quality and excellence, efficiently and responsibly attending our suppliers, clients, and business partners; and always remember in every situation the principles and values that we promote when we are representing the company:

WHEN DRIVING A VEHICLE BELONGING TO GRUPO CUPRUM:

- Ensure that the vehicle is clean and in good condition so that it does not generate noise or excessive contamination and make sure that the load is well secured to avoid accidents.
- Respect speed limits and traffic regulations.
- Drive safely and cordially, giving way to pedestrians, and avoiding conflicts with other drivers.

WHEN IN CHARGE OF A GRUPO CUPRUM BRANCH OR ESTABLISHMENT:

- Keep the branch or establishment clean and well attended, take care of the real estate and facilities of the branch or establishment, and make responsible use of the same.
- Treat clients with kindness and respect, answering their questions, and guiding them towards the best way to meet their needs.
- Be friendly to the neighbors of the branch or establishment; avoid generating excessive or unnecessary noise as well as hindering the transit of people or vehicles; contribute to the cleaning of the public space in front of the site or branch.
- Report to the channels and established media of the Patrimonial Protection area of any risk situation around the branch or establishment such as fires, leaks, accidents, and crimes, among others

DESIGNING A PUBLICITY CAMPAIGN:

- Avoid messages that generate negative stereotypes, prejudices, or discrimination against any person or group that promote negative attitudes or that incur in the promotion of corruption.

6.4.5 Conflict of Interest

A conflict of interest may arise when, in a situation related to our work, we may face the need to choose between the interests of Grupo Cuprum or our own interests. The fact that there is a conflict of interest does not mean that we are going to act incorrectly or that we will invariably generate a loss for the company. That is why it is important to request advice and inform the company in a transparent and timely manner about our situation in order to make the best decision for all. In general terms, a conflict of interest can involve us, our partner, immediate family members, or even close friends. This situation can be presented when you:



7 RELATIONSHIP WITH OUR COMMUNITIES AND THE ENVIRONMENT

Grupo Cuprum considers itself to be an actor and member of the communities in which we are established, and we recognize our neighbors as key stakeholders, this is why we seek to establish healthy and productive relationships with them.

7.1 Dialogue and Resolution of Conflicts:

- > **As a company:** develop and maintain channels of communication and dialogue spaces with our neighboring communities that allow us to find joint solutions to the problems generated by our operations or the environment.
- > **As a person:** if we or our relatives are neighbors of the communities surrounding the company, keep us informed of what happens in these communities and share any information about problems or nonconformities generated by our operations or the environment with the company.

7.2 Environmental Impacts:

- > **As a company:** take the necessary technological, operational, and collaborative measures to minimize the environmental impacts generated by our industrial activities and mitigate

and compensate those impacts that we cannot avoid. This includes impacts by:

- Noise or visual impacts of our industrial equipment or vehicles;
- Emission of toxic substances or pollutants to the atmosphere that cause damage to health or unpleasant odors;
- Discharge of contaminated water or the release of toxic substances that may contaminate the soil or bodies of water;
- Generation of waste that implies a health risk or that contaminates the streets, public spaces, fields, or bodies of water;

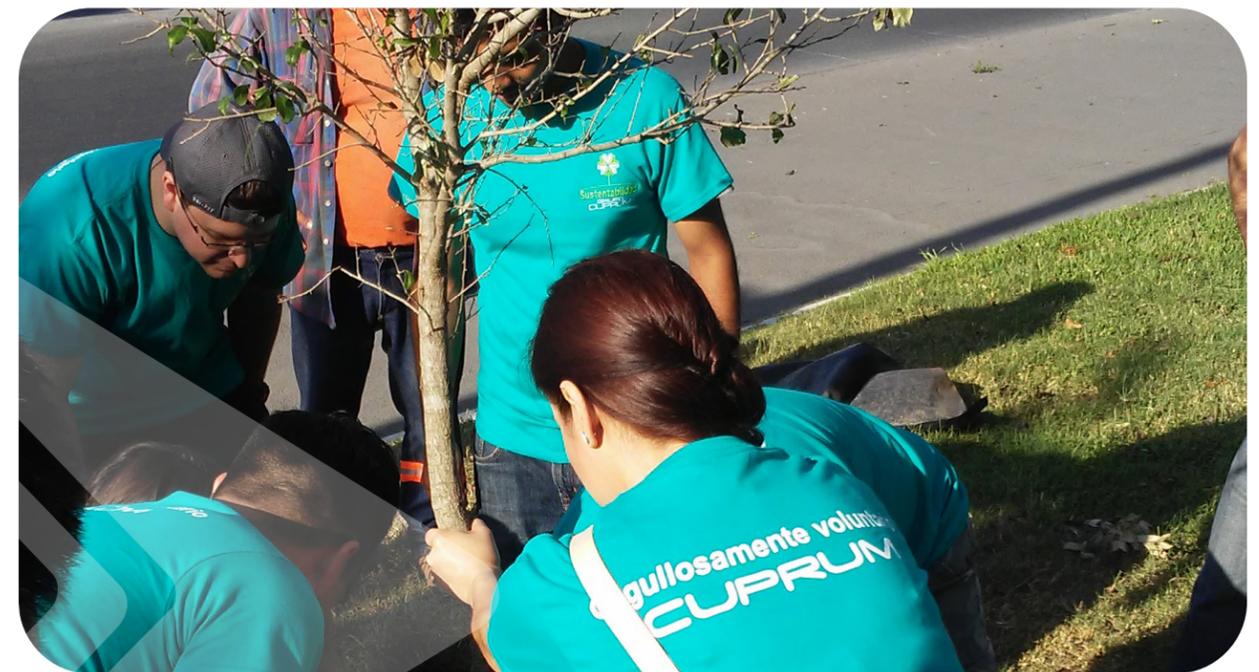
Damages generated to the urban infrastructure resulting from our activities or the transit of our vehicles or the entry and exit of vehicles from our suppliers and clients to our facilities.

- > **As a person:** ensure that our work equipment functions correctly, warn of any flaw or lack of maintenance that increases environmental impacts, report any incident that is generated in the community caused by a human error attributable to Grupo Cuprum.

7.3 Involvement with the Community

- > **As a company:** contribute, as much as possible, with our capacities and resources, to locally generate economic and social benefits.

- > **As a person:** practice a participatory citizenship, contributing to generate a safe, peaceful, and harmonious environment around our operations. In our free time, promote a behavior following the same principles and values of this Code of Ethics to be able to become agents of change.



With the updating and presentation of our Code of Ethics, Grupo Cuprum reaffirms our commitment to the promotion and experience of a culture of integrity and ethics at all levels and sites of the organization. Likewise, we are

convinced that this guide must be adopted by the entire Cuprum Community, consolidating our principles, as well as our values of Integrity, Respect, Humility, and Unconditional Responsibility in all our actions and leadership.

