

CODE OF ETHICS

Regulation of basic principles and conduct guidelines that must be followed by employees, suppliers, customers, and anyone who has a partnership with Grupo Sesajal.

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TABLE OF CONTENTS

| LETTER FROM OUR CEO | . э |
|---|------|
| OUR CULTURE | . 6 |
| Our purpose | . 6 |
| • I'm Grupo Sesajal® | . 7 |
| Our Values | . 8 |
| Commitment and responsibility to our employees, community and environment (CRECE) | . 9 |
| OUR PEOPLE | . 10 |
| Human Rights in the Company | . 10 |
| Diversity, Inclusion, and Non-Discrimination | . 11 |
| Psychosocial Risk Factors in the Company (NOM-035-STPS) | . 11 |
| Core Principles at Work | . 12 |
| Workplace Health and Safety | . 13 |
| OUR PLANET | . 14 |
| Environmental Commitment | . 14 |
| OUR RESOURCES | . 15 |
| Protection of Assets | . 15 |
| Protection of Intellectual Property | . 15 |
| Privileged and Confidential Information | |
| Accuracy of Information | |
| Information Technology and Communication | |
| Personal Data | . 17 |
| OUR RELATIONSHIP WITH THIRD PARTIES | . 18 |
| Relationship with Our Clients | |
| Relationship with Our Suppliers | |
| Relationships with Competitors | |
| • Employees as Clients | |
| Employees with Outside Interests or Independent Businesses | |
| Employees or Relatives of Employees as Suppliers | |
| Government and Authorities | . 24 |
| CULTURE OF LEGAL COMPLIANCE | |
| Conflict of Interest | |
| Money laundering | |
| Gifts and Entertainment | |
| Bribery and Corruption | 27 |

| OUR RESPONSIBILITIES | 28 |
|--|----|
| Legal Compliance | 28 |
| Respect for Local Customs | 29 |
| Commitment to Our Community | 29 |
| Relationship with Shareholders and Partners | 29 |
| Participation in Civic and Political Activities | 30 |
| • Dissemination and Evaluation of the Code of Ethics | 30 |
| | |
| ETHICS COMPLIANCE SYSTEM | 31 |
| Ethics Committee and Reporting Line | |
| How to Use the Code? | 32 |
| Retaliation protection | |
| Confidentiality and Anonymity | 33 |
| Violations of this code | 33 |

LETTER FROM OUR CEO

Dear collaborator:

"Growth and transformation" have defined us in recent years. We have grown not only in the number, diversity and nationality of collaborators, products and markets, but we have also decided to expand internationally and establish operations in new countries. These include agricultural development, processing, distribution and research, also development of ingredients and end-consumer products.

One of the key challenges in the growth and success of Grupo Sesajal® has been to live and communicate our values. These values have been present since our beginnings and despite the dynamic, fast-paced growth of the company remain the foundation upon which all our actions are built. They define who we are, how we behave and what we believe in, and now, they are integrated into our Code of Ethics.

This code is the result of daily work to reinforce the trust of our collaborators, clients, investors, suppliers, and community. It will guide our decisions, clarify what is and isn't allowed, and ensure transparency in our actions.

Everyone must follow this Code of Ethics and as our responsibility report any violations of it.

I trust I have your full support, enthusiasm and commitment to continue building a better future, more united by the values that define us all in this great group.

Let's continue to be role models and a reference for our families, neighborhoods, and communities. Let's keep building a group of highly efficient and deeply human companies.

> SINCERELY Iñigo González CEO Grupo Sesajal®









I have the power to transform my actions into something positive.



I live the values of Grupo Sesajal®.



I am proud of the place I work.



I have the humility to acknowledge my mistakes and strive to improve.



I take care of the resources around me.



I value and respect the work of others, knowing we all seek to achieve the same goal.



Our values



RESPECT

To value myself and the time, effort and work of others; to accept their ideas and ways of thinking. To listen to the opinions of colleagues and subordinates, and follow standards and procedures.

A EXCELLENCE

To make things happen, be proactive, propose, dare and accept the challenge of being better every day. To seek solutions and alternatives in the face of problems.

1 TEAMWORK

We aim to go far, working together toward the same goal; to make conscience that we all are one group.

4 INTEGRITY

To always do the right thing, even when no one is watching. To be consistent between what we say and what we do.

G PASSION FOR WHAT WE DO

To enjoy our work every day and to give our heart, mind and soul to everything we do, spreading that energy to others.

SUSTAINABILITY

Our actions and decisions could be sustainable on their own, without depleting the resources around us, always mindful of and committed to future generations.



COMMITMENT AND RESPONSIBILITY TO OUR EMPLOYEES, COMMUNITY AND ENVIRONMENT (CRECE)

Grupo Sesajal® stands out as a group of companies governed by the same rules of excellence.

All collaborators are committed with our values internally and externally in various areas: social, human and environmental. This reflects our respect for values, people, communities, and the environment. In this way, we seek to build the common good, act with honesty and transparency, and generate added value by promoting the full development of individuals, communities, and the environment in an ethical, sustainable, and responsible manner.













OUR PEOPLE

Human rights in the company

We are committed to respecting, promoting, and protecting human rights in all our activities, this in alignment with the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

This dedication also extends to our supply chain by requiring ethical, sustainable, and respectful labor practices. Such as decent working conditions, fair wages, and the prohibition of child labor (Code of Ethics for Suppliers).

Through ongoing collaboration with our partners and suppliers, we work to ensure adherence to these principles and to promote standards that contribute to a more equitable and sustainable society.



Consult the company human rights on this QR code





For more information, consult the Ethical Trading Initiative code on the anex 2 at the end of this document



For workdays with heavy workloads and overtime. How much overtime can we work?

By law, we can work up to 12 extra hours per week, and it's forbidden to surpass this time.



Diversity, inclusion, and non-discrimination

We value and respect the traits that make each person unique. Background, education, gender, ethnicity, nationality, generation, age, work style, ideology, religion, sexual orientation, and technical abilities are not obstacles to forming high-performance teams.

We aim to create an environment where our people are valued, a place where individuals can daily showcase what defines them and engage with others by highlighting the best of themselves.

Please refer to our Inclusion, Diversity, and Non-Discrimination Policy available in Q-doc or scan the QR code below.





I am a woman, and I would like to transfer to the warehouse area as a forklift operator. Can I apply for that position as a woman?

At Grupo Sesajal®, when considering candidates for job positions, we are a company guided by individuals' capabilities and skills; anyone who meets the required competencies is welcome to apply and fill a vacancy.

Psychosocial risk factors (NOM-035-STPS)

In Grupo Sesajal® we are committed to promote and maintain a working environment in which our collaborators are treated with respect and dignity, rejecting, prohibiting and reporting any kind of psychosocial risk in the company, or any other kind of activity that attempts within the dignity of our collaborators or third parties, inside and outside of our workplace

Grupo Sesajal® rejects and prohibits any kind of violence inside or outside of his facilities

Consult our psychosocial risk prevention policy (PL-BEM-001) in Q-doc or scan this QR code with your phone camera.



The ethics committee is responsible of the investigation of any report submitted in the ethic line (by phone or website) according to the PL–BEM–001



I like to hang out with my colleagues, but one of them crosses the line with his comments in front of the others. I don't like those kinds of comments about myself. Should I tell him or report him?

It is your responsibility to inform your colleague that at Grupo Sesajal®, we are guided by this code of ethics. Therefore, they should understand; if this behavior occurs again or if there is any form of retaliation following this conversation, you can report the situation to your direct supervisor or file a report through the ethics line

Core Principles at Work

All individuals who are part of Grupo Sesajal® are valued, respected, and protected.

Forced labor is strictly prohibited, and the company fully supports the elimination of child labor. Full compliance with applicable laws regarding the employment of minors is upheld at all times.

For further details on this subject, please refer to the ETI Code by scanning the QR code below



Health and safety in our workplace

Everyone working at Grupo Sesajal® has the right to a safe and healthy work environment. Workplace safety depends on each one of us, which means we all have to guarantee the following:

- a) Promote and maintain safe and healthy workplaces.
- b) Ensure a suitable work environment.
- c) Develop safety awareness among personnel.

If my partners do not follow the signs in the bathroom areas. Should I report them?



First of all, try to explain to them the importance of following the safety sings; if you observe the same behavior after that, you could report them with your superior or with the industrial safety area.





OUR PLANET

Environmental Commitment

At Grupo Sesaial®, we recognize environmental protection and conservation as part of our social responsibility, as well as our duty to comply with all applicable environmental laws and regulations.

We respect the environment and strive to minimize our impact on it. Our goal is to communicate our achievements in this area openly, along with the challenges we face.

We must put Grupo Sesajal®'s environmental commitment into practice through sustainable processes, giving preference to the use of renewable raw materials and considering the environmental impact of our behavior in all aspects of our work. For example:

- a) Avoid unnecessary travel.
- b) Conserve water and energy.
- c) Avoid generating waste. When waste is unavoidable, we must ensure that materials are either recycled or disposed of responsibly.

Even small actions, like separating organic waste in the company cafeteria, can make a meaningful difference.

Refer to our Environmental Policy PL-SIG-002 in Q-doc or scan this QR code with your phone camera.





We already comply with local laws and Grupo Sesajal@'s commitment to the environment goes beyond legal compliance. We keep working for the environmental impact at the local, national, and international levels.



OUR RESOURCES

Protection of Assets

At Grupo Sesaial®, we understand assets to include not only machinery. buildings, trucks, furniture, computer equipment, and telephony systems, but also plans, designs, formulas, processes, systems, technology, product launch plans, business strategies, promotional campaigns, and our brands. Therefore, we must protect these tangible and intangible assets by maintaining their confidentiality and security at all times.

Assets should be used exclusively for business purposes, and it is everyone's responsibility to use them properly to prevent malfunction.

Protecting our intellectual property

At Grupo Sesajal®, employees are committed to safeguarding intellectual property, which encompasses not only operational processes, information systems, and marketing strategies but also financial data, product information, and personnel records.

Employees are prohibited from using the company's name or resources for personal gain. Any deviation from this policy must be reported promptly.



Privileged and Confidential Information

Disclosure or unauthorized sharing of privileged and/or confidential information is not permitted under any circumstance.

When participating in activities as instructors, speakers, or students, collaborators must exclusively use information that has been previously authorized by Grupo Sesaial®.



Veracity of the information

The accuracy of the operational, commercial, accounting, and financial records of Grupo Sesajal® companies relies on the integrity of the information used to prepare them. Employees involved in their preparation and recording are responsible for ensuring that facts, information, or documents are not falsified.

This includes respecting laws, avoiding alterations in the natural flow of information from its generation to communication, not withholding information from auditors, and recording assets and liabilities promptly and at fair value.

Complete and accurate financial information must be provided to financial institutions and relevant authorities in compliance with Grupo Sesajal®'s internal policies and applicable regulatory frameworks. Employees must protect the integrity of documents and databases under their custody, adhere to legal retention periods, and destroy them upon expiration of these periods.



Information Technology and Communication

Grupo Sesajal®'s technology and information resources should be used solely for business purposes. The use of these resources to access websites that jeopardize the security of technology, information, and communication equipment is prohibited.

The personal use of company technology and resources should be kept to a minimum and must never interfere with work duties.

Regarding social media use, employees are expected to maintain a professional and ethical demeanor at all times, whether inside or outside the workplace. Any online publication that may negatively impact the company's reputation or involve inappropriate, defamatory, or discriminatory content or that violates internal policies will be considered a breach of conduct. This includes, but is not limited to, public statements that could harm our image or compromise confidentiality, safety, or the well-being of our employees and clients.

Personal Data

Personal data is collected and managed responsibly, ethically, and in compliance with applicable laws and regulations.

Employees must not share their passwords with others, including their direct supervisors, impersonating another user, or download/install programs and files that are not required for operational purposes.

My colleagues and my direct supervisor have requested my passwords for accessing various Sesajal® platforms. Should I share them? Or maybe just to my supervisor?

No. Passwords are strictly personal and must not be shared with colleagues or supervisors within the organization.



OUR RELATIONSHIP WITH THIRD PARTIES

Relationship with Our Clients

We strive daily to build long-term relationships with our clients by offering fair and honest treatment in every transaction. All forms of corruption, bribery, favoritism, or any activity that violates laws, human rights, customs, or that poses a risk to consumer health are strictly avoided.

Products are provided with the highest possible quality and timeliness, always in compliance with official regulations and Grupo Sesgial's internal standards.





Please remember there is a formal procedure for registering new suppliers.

A client asked me to skip the ethical certification requirement that governs our relationships. Can I proceed with the registration process?

No, that is not acceptable. Our clients must understand that all of our decisions are regulated in accordance with the Grupo Sesajal® Code of Ethics — it is a mandatory requirement.

Relationship with Our Suppliers

At Grupo Sesaial, all interactions with our suppliers must strictly adhere to our Code of Ethics. Without exception, suppliers are required to follow Grupo Sesaial's official registration procedure, as this is a necessary condition for establishing a business relationship. We seek to work with suppliers who have a strong reputation and who share our ethical values and principles.

Relationships between Grupo Sesajal® employees and suppliers must be based on technical and economic selection criteria, and handled with independence and integrity in every transaction.

a) Supplier Selection

Supplier selection must be fair, free from personal preferences, and based on factors such as price, quality, reliability, and the characteristics of the products or services, as well as the supplier's technical capacity to meet required response times. This selection must follow established policies and procedures to ensure the best cost-benefit outcome and full compliance with the group's budget guidelines.



Our suppliers must have a solid reputation and share our values and Code of Ethics.

Employees involved in the purchasing process must not accept any discounts or pricing offers intended to influence future purchases or affect other operations to the detriment of the group.

Those responsible for purchasing decisions must ensure that no business is conducted with suppliers who have a poor commercial history.

b) Quotes, Pricing, and Purchasing Decisions

When inviting suppliers to submit quotes, all technical, commercial, and other requirements must be shared with them fully and equally. Any changes to the original specifications must be communicated to all participating suppliers as soon as they are known.

c) Comments About Suppliers

Grupo Sesajal® employees must not discuss a supplier's issues or weaknesses with other suppliers or with external parties. All prices, conditions, and other data received from current or potential suppliers must be treated as confidential information.

d) Contracts or Purchase Agreements

All relationships with suppliers must be properly documented under a contract or agreement to ensure compliance with the established terms.



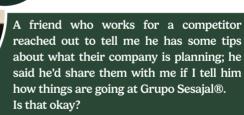
Relationships with competitors

At Grupo Sesajal®, we are committed to the market through quality, service, and commercial strategy, always in line with our principles and values. We respect our competitors, and whenever we need to speak about them, we will use fact-based information only.

Any comparison with competitors must use accurate terms, without qualifiers, and must not involve misleading data or arguments.

Our advertising and communication are based on truth and comply with the competition laws of the country where we operate.

As Grupo Sesajal® employees, we sign a professional confidentiality agreement provided by the Internal Audit team, either by email or through the Human Development office.



Absolutely not. Remember, all our information must be treated as strictly confidential. Sharing confidential information is a serious offense and is punishable by law.



Employees as Customers

Company personnel may purchase our products for personal use, as long as it is in accordance with the established policy. Grupo Sesajal® reserves the right to verify the final destination of the purchased products. Under no circumstances may Grupo Sesaial® employees engage in businesses dedicated to the commercialization, distribution, transportation, or transformation of our products or services.

Refer to our **Employee** Sales Procedure PR-DEH-003 Talent and culture office, or scaning the QR code below.







Employees are encouraged to purchase products for personal use and act as brand ambassadors, promoting the quality of our products.



Employees with Outside Interests or Independent Businesses

We must not engage in any business or activity that interferes with the company, nor take advantage of our role or position.

The training and knowledge acquired within Grupo Sesajal® must be used exclusively to support and improve company operations. Therefore, employees must not offer services to third parties or share the knowledge gained within the organization.

Employees are not allowed to sell items or products within the company that are part of a personal or family business.





Employees or Relatives of Employees as Suppliers

Sesajal® personnel are not allowed to be suppliers to the company. Anyone who owns a business must abstain from providing products and/or services to any of the Grupo Sesajal® companies.

Employees must not participate in or influence-either directly or indirectly—any requirements, negotiations, or decision-making processes involving clients or suppliers with whom they have a family relationship or any other personal interest that could result in personal gain.

All employees are required to notify their immediate supervisor if they have relatives who own businesses that are or intend to become suppliers or clients of our company.



If you have a family member interested in becoming a supplier for Grupo Sesajal, please inform the relevant department responsible for that product or service, so the Purchasing team can follow the appropriate evaluation procedure.

Government and Authorities

We are committed to addressing the requirements and observations of governments and authorities, fostering effective and respectful collaboration in support of their mission, always within the framework of applicable laws.

Any interaction carried out on behalf of Grupo Sesajal with government entities or officials is conducted in full compliance with current laws and in accordance with this Grupo Sesaial Code of Ethics.

CULTURE OF LEGAL COMPLIANCE

Conflict of Interest

To prevent any conflict between the personal interests of employees and those of Grupo Sesajal®, all employees within the Group are responsible for disclosing any financial or non-financial interest that may interfere with their duties in the company.

At Grupo Sesajal®, we understand that family is a top priority for our employees. Therefore, the hiring of direct or indirect relatives is allowed, provided that Human Development is notified in advance. This department will evaluate any potential conflict of interest and, if no risk is identified such as a supervisor-subordinate relationship, working in the same area or department, or jeopardizing the achievement of company objectives—the hiring may proceed.

If an employee has any relationship with a client or supplier of Grupo Sesajal® that could impact their performance, they must disclose this information to the Human Development department.

The company is hiring for the Security Department. My brother-in-law has experience in this area and is looking for a job. Can I recommend him?



Yes. It is important that you inform Human Development about the family relationship so that they can evaluate any potential conflict of interest and proceed with the hiring process if approved.

Money laundering

Grupo Sesajal® complies with all applicable laws and regulations regarding money laundering. Any warning signs or suspicions must be reported to the ethics line.

One of our clients asked if they could make a payment using multiple accounts, combining cash and checks. Can this be done? What should I do?



You must be cautious with these types of transactions. This could potentially be a case of money laundering. Such payments should only be accepted under exceptional circumstances and must be approved by the Chief Financial Officer.

Gifts and Entertainment

All gifts or tokens of appreciation received from suppliers or any individuals outside the organization must be accepted graciously and reported to the Human Development department. All gifts and items will be raffled fairly at the end of each year.



Bribery and Corruption

Grupo Sesaial® reaffirms its commitment to integrity and ethics at all operational levels. We are committed to complying with both national and international anti-corruption laws and regulations, as well as all applicable standards in the countries where we operate.

Bribery and corruption are strictly prohibited under any circumstances. If anyone within the company or a related third party is involved in or exposed to bribery or corruption in business or work-related interactions-whether inside or outside the organization—they must report it immediately to the ethics line

We understand that bribery can damage our reputation, but it goes far beyond that. Acts of bribery and corruption can lead to unfair competition, as well as unsafe products in the global market and in the communities where we live and work.



Please refer to our Anti-Corruption Policy: PL-SIG-003 in Q-doc, or scan this QR code with your phone camera.

I was asked to urgently process a municipal permit. One of the advisors told me it could be expedited by offering a sum of money. What should I do?



Under no circumstances should we hand over money unless we are certain of its purpose and it is directly and properly related to the payment of the official procedure.





OUR RESPONSIBILITIES

Compliance with the Law

Grupo Sesajal® is committed to complying with all current international regulations and standards in the countries where it operates, ensuring that all activities are conducted according to the highest national and international legal and ethical standards.

We stay informed about the laws of our country and the various countries where we operate, making necessary adjustments to comply with the requirements of their authorities. Under no circumstances should any employee of Grupo Sesajal® commit an illegal or improper act, nor induce or instruct a third party to do so. This principle applies to all business areas without exception. Violation of the law is a criminal offense that can cause severe economic damage and harm to Grupo Sesajal@'s reputation. Any legal doubts regarding a practice. law, regulation, or standard should be directed to the Legal Department.

We have the Internal Civil Protection Program unregistered with the authorities due to the high cost of the procedure. Can we continue with the program without registering it, knowing that it fully complies with state regulations?



By law, we are obligated to fulfill all our responsibilities in accordance with the applicable legislation in order to avoid any infractions.





Respect for Local Customs

Given our presence in various countries with distinct cultures, we strive to understand and respect the local customs and practices of each place, provided they do not violate the law or contradict our principles and values, or conflict with the provisions of this code.

Community Commitment

We acknowledge our commitment to the community, grounded in our principles and values, which aim to simultaneously generate economic and social value in all our actions for growth and sustainability.

We are dedicated to creating and maintaining sources of dignified and productive employment for our community...

I perceive that many improvements could be made in my work area, such as installing television screens, adding bathrooms, installing an elevator, or building a third floor. I believe these would be beneficial. Would I be correct in submitting requests to incorporate all of these?



Remember, we must optimize the value of our investments. The Engineering and Projects Department will conduct a needs assessment and evaluate the costs and benefits of the proposed changes. Proceeding without their approval would be a violation of our procedures.

Relationship with Shareholders and **Partners**

At Grupo Sesajal®, we are committed to optimizing profitability in a reasonable manner for our shareholders and partners. As collaborators of the Group, our responsibility is to protect and enhance the value of the investment, primarily through the prudent and profitable use of resources and by adhering to the standards set forth in this code in all our operations.

Civic and Political Participation

Grupo Sesajal® does not have any ideological, political, or partisan affiliation. However, it encourages civic collaboration in professional associations and community organizations.

Employee participation in political and/or electoral processes will be entirely personal and must not include the use of time, financial support, or resources belonging to Grupo Sesajal®. We have a Dignified Work Committee, whose representatives act as intermediaries between the union and the company. Through their working sessions, they provide a voice to all employees of the Group who approach them to express concerns about their work environment, aiming to ensure that the company remains a dignified place to work.



Are the employees allowed to participate in political activities in our workplace?

At Grupo Sesajal®, we respect our collaborators' right to participate as individuals in political processes. However, the workplace is not an appropriate setting for engaging in such activities.

Dissemination and Evaluation of the Code of Ethics

The Ethics Committee is responsible for disseminating the Code of Ethics among the staff; it distributes the code and collects acknowledgment receipts. The Human Development department incorporates the topics covered in this code into the training programs. The Ethics Committee will assess the knowledge and adoption of the content of this document.

ETHICAL COMPLIANCE SYSTEM

Our ethics line and committee

At Grupo Sesaial®, we are committed to reasonably optimizing profitability for our shareholders and partners. Likewise, our commitment as collaborators of the Group

is to protect and enhance the value of the investment, primarily through the prudent and profitable use of resources and by adhering to the standards set forth in this code in all our operations.



It is the responsibility of the Ethics Committee to ensure the dissemination and application of the Code of Ethics, which entails:

- a) Promoting the values and behaviors encouraged in our Code of Ethics.
- b) Serving as consultants and advisors to employees.
- c) Addressing and resolving employee requests.
- d) Referring cases to the appropriate authority.
- e) Approving reports submitted through the ethics line.
- f) Generating statistics and reports.

In addition to the above responsibilities, the Ethics Committee has the following functions:

- a) Updating and modifying the Code of Ethics in accordance with changing needs and requirements.
- b) Investigating and documenting reports made through the ethics line.
- c) Provide feedback and, when possible, follow up on requests to build trust among employees.
- d) Promoting consistency in the interpretation and application of the Code.

The Ethics Committee shall be composed of individuals who may be internal or external, distinguished by their exemplary track record, recognized integrity, and possessing a comprehensive understanding of the business. The selection, approval, and renewal of Ethics Committee members shall be the responsibility of the Board of Directors of Grupo Sesajal®.

How to Use the Code?

Identify in the index the thematic content from which your questions or comments arise. Review the corresponding page to see if the content resolves your concerns; if not, consult your immediate supervisor to clarify them or simply to discuss any situation.

If you cannot find a solution to the issues that concern you, you can use the Ethics Line, which is free and strictly confidential. It is available to: clients. suppliers, and any collaborator of Grupo Sesajal®.

The "Sé Ético" line is available 24 hours a day:



When you submit your report, you will be provided with a tracking number to check its status. Please remember that you are primarily responsible for following up on your report. We kindly ask you to call after 3 or 4 days to inquire about the status of your complaint.

Retaliation protection

All individuals working at Grupo Sesajal® are prohibited from taking any form of retaliation against a person who, in good faith, reports alleged misconduct or cooperates with an investigation or audit.

We promote an environment in which the reporting of misconduct is encouraged, valued, and protected. Employees may confidentially report any inappropriate or unlawful behavior without fear of retaliation. The organization guarantees that such reports will be handled fairly and respectfully, safeguarding the integrity of those who come forward.

Contractors, clients, suppliers, and employees who report alleged misconduct in good faith—whether involving Grupo Sesajal® personnel or not—or who cooperate in an investigation or audit, will also be protected from retaliation to the extent possible.

Acts of retaliation constitute breaches of conduct that will lead to disciplinary measures, which may include termination of employment or other appropriate actions, in accordance with the regulations, standards, and policies of Grupo Sesajal®.

Confidentiality and Anonymity

Grupo Sesajal® and Ethics Global place high priority on maintaining the confidentiality of the information they handle. Therefore, they protect such information through physical, electronic, and procedural safeauards.

Violations of this code

Adherence to this code is strictly mandatory. Directors, managers, and all other executives and employees of Grupo Sesajal®, at any level, shall set an example by complying with it, promoting it consistently, and taking appropriate disciplinary actions when any of their subordinates fail to do so.

Any employee who engages in business practices contrary to those established in this code shall be subject to disciplinary measures, which may include termination of employment and/or legal action. Employees of Grupo Sesajal® always have the freedom to consult with their supervisors or use the established reporting channels regarding situations that raise concerns. Finally, it is important to note that the Internal Audit department will include compliance with this Code in its reviews, making adherence to the established guidelines of vital importance.

Failure to report a known violation of this Code of Ethics and/or Corporate Policies implies shared responsibility and may result in corrective action.



Refer to our Code of Ethics

ETHICAL TRADING INITIATIVE



Scan this QR code with your phone camera to access the full document directly.







Ethics line 800 7338 426 www.sesajal.com









| Place: | | Day: | Montn: | Year: |
|-------------------|---------------------|--|--------------|----------------|
| I | | | | hereby express |
| its entirety. I c | | Grupo Sesajal® Code th it and promote its o ode of Ethics. | | |
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| As an employ | • | ajal®, I will do what is | necessary to | set an example |
| | | SINCERELY | | |
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THIS PAGE IS EXTRACTED FROM THE CODE OF ETHICS, 3RD EDITION.



