

CODE OF CONDUCT



WE ACT WITH
INTEGRITY!

Dear team:

At Saavi we firmly believe in our values, because thanks to these and our ethics we always seek to do the right thing, which has led us to achieve great results and to support our communities and collaborators.

To continue strengthening our company, we share with you our Code of Conduct, which will help you make better decisions; it will also be your daily guide in Saavi, because if you have doubts about any complex situation or about what is the appropriate behavior, here you can find orientation and guidance.

This document also sets out the conduct that everyone must respect, both employees, internal collaborators and external partners, whether in our administrative offices or in the plants where Saavi Energía has operations, in this way we guarantee compliance with the law and continue to illuminate Mexico.

We would also like to remind you that the Compliance area is at your disposal for any consultation #AcércateACompliance.

We know that we count on your commitment to continue respecting our regulations!

Sincerely,



JAIME TUPPER B.
President



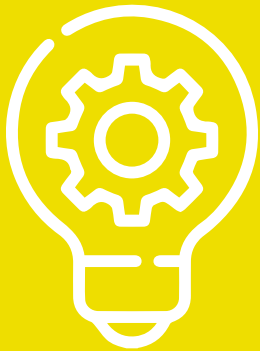
MAURICIO DEL VALLE
CEO



OUR VALUES

I MAKE
**THE RIGHT
DECISION**

#WeAreSaavi



Innovation

We are open to new ideas; **we learn and experiment** to develop our talent and perform excellently. We are innovative and that distinguishes us from others.



We adapt new ideas and concepts to make our work more effective.



We bring a different way of doing things, and we are always open for more.



We are open to new trends in order to seek improvements in our own processes.



We point out improvements in the organizational processes to generate added value.



We monitor the industry's best practices to incorporate significant improvements.



We keep up to date with the technical aspects of the business and apply what is feasible.



We establish plans and programs with important innovation components.



We empower others to seek solutions to problems.



We constantly seek continuous improvement in processes and products.



We are creative and positive in the search for solutions to challenges.



Integrity

Every day we work with **righteousness, transparency and respect** for our colleagues and society. We do the right thing even when no one is looking.



We act congruently with what is said or considered important.



We communicate our intentions, ideas and feelings openly and directly.



We act with honesty, even in difficult negotiations with people outside the organization.



We conduct ourselves with transparency, pointing out both the benefits and risks in every situation or negotiation.



We prioritize Saavi's policies in any business situation or opportunity.



We admit our mistakes, either with the people or with the organization and act accordingly, assuming responsibilities and proposing solution.



We express our points of view openly and respectfully, even when this may make someone uncomfortable.



We express our disagreement using open dialogue rather than complaining or pointing fingers behind our backs.



Integrity



We are opposed to carrying out orders that involve actions that are considered unethical.



We act and challenge others to act in accordance with the organization's values.



We are proud to adhere to the organization's values.



We treat all people equally and reject discriminatory acts.



We promote diversity and encourage inclusion in our work teams.



We are open and honest in work situations.



We promote attitudes and actions that contribute value to achieve gender equity, equal opportunities and rights for all people.



Teamwork

We achieve our goals because we use our capabilities to the fullest extent, always **collaborating with each** other as if we were one. We are a team and that makes us stronger.



We hold working sessions with collaborators from other areas to work alongside one another..



We express personal satisfaction with the success of our peers and direct reports.



We show concern for supporting the performance of other areas of the company, without expecting anything in return.



We prioritize the interests of the group/company over our own interests.



We express our support in meetings to motivate others to keep working.



We promote a friendly work environment, through a an atmosphere of empathy and cooperation.



We nurture trust with those with whom we interact and demonstrate sensitivity upon the needs of others.



We consider each team member's point of view and will always acknowledge when we do not have a say in the situation at hand.



Teamwork



We listen to feedback from team members, including peers and direct reports, on decisions made and the way we do things.



We support and respect the decisions made as a team.



We provide information to others about what can influence our area or our responsibilities.

Commitment



We take **responsibility for the well-being** of our employees, customers, the environment and the communities in which we operate. We fulfill our duty.



We offer suggestions and ask for the necessary support at any level.



We are proactive: we do not wait to be told what to do and we prefer to take action.



We seek to know and get involved with the guidelines, objectives and goals established in the organization.



We show dedication, effort and personal discipline in each of the activities in which we participate.



We fulfill the activities entrusted to us in due time and form.



We periodically monitor the established goals.



We meet and require adherence to the defined guidelines.



Commitment



We use the organization's resources in a mindful manner.



We review organizational plans versus the execution of the plans..



We support decisions that benefit the entire organization, customers and the environment.



We fulfill our responsibilities proactively.



Passion

We enjoy what we do and **turn it into a life project**, that's why we always go beyond our limits. That is our passion.



We show constant enthusiasm towards the achievement of individual, team and Saavi objectives.



We document the lessons learned and seek to improve our failures.



We acknowledge and accept feedback regarding our areas of growth and strengths.



We set achievable goals and encourage employees to meet them.



We show constant encouragement and pride, despite the pressures at Saavi.



We seek to contribute with our work to achieve the permanence of a contract, improvements and growth of services.



We show a positive attitude during the workday.



Passion



We maintain an attitude of encouragement and support towards other members of the work team.



We go the extra mile to meet our role and team objectives.



We show in our attitudes a sense of belonging to the company.



We motivate our colleagues so that they feel part of the company.



We take the team's objectives as our own.



We contribute to improving the work environment by maintaining a positive attitude that spreads enthusiasm and motivates the fulfillment of the team's objectives.



Customer Focus

We offer more than what the customer expects, **providing customized solutions and services to make them feel unique.** That is the key to our long-term relationships.



We help customers by understanding and meeting their needs.



We ask and inquire about the needs of our customers and suppliers in order to understand and solve the problems that impact our company and its relationships.



We seek long-term benefits in our negotiations and discussions.



We seek to positively impact our clients in every interaction, exceeding their expectations to always surprise them.



We seek information on both latent and emerging customer needs.



We take on the customer's problems as our own to start solving them.



We maintain an attitude of total availability with the customer, providing more than what they expect.



We make sure that we have sufficient information about the customer before making a visit.



We periodically contact the client to discuss mutual expectations and to know their level of satisfaction (corresponding areas).



We seek at all times to maintain an excellent relationship and image with our customers.



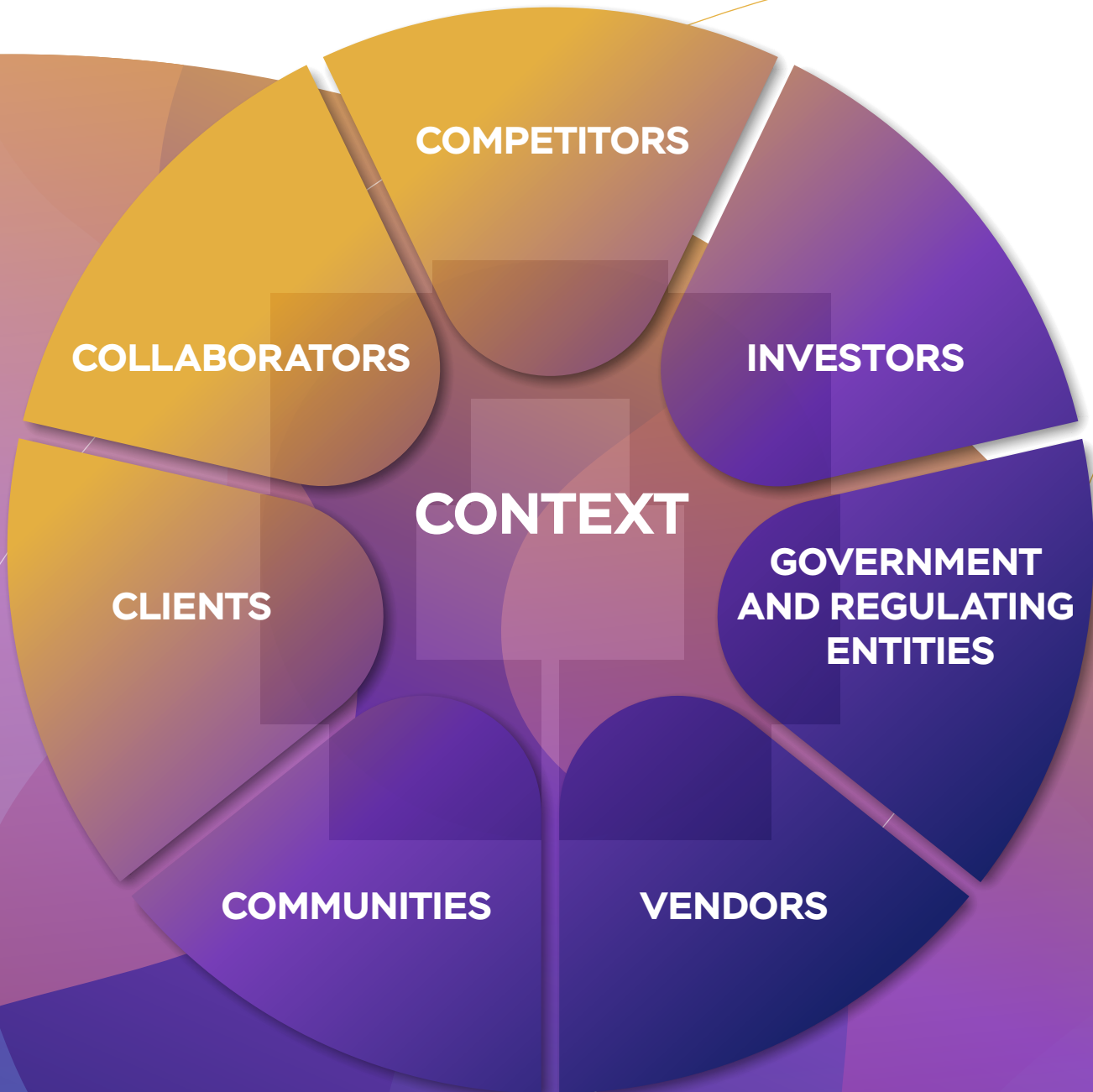
INTRODUCTION

I MAKE
**THE RIGHT
DECISION**

#WeAreSaavi

OUR RELATIONSHIP WITH THE ENVIRONMENT

As important is **the what and the how** we achieve our objectives. Our reputation is built day by day based on how we act towards those who are part of our environment:



WHAT IS A CODE OF CONDUCT?

These are the behaviors and guidelines that all Saavi Energía's internal and external collaborators must follow to ensure that Saavi Energía is an **ethical company**. It is part of the internal regulations, and its fulfillment/adherence is mandatory.

This document sets out the **behaviors, values, obligations and basic commitments** that both external and internal collaborators must comply with, in addition to the policies, guidelines and procedures established and disclosed by Saavi Energía, which are also mandatory.



WHO MUST FOLLOW THIS CODE?

All Saavi Energía's internal collaborators and/or employees *

It is also mandatory for:

External collaborators of Saavi Energía, i.e. companies and/or persons with whom Saavi Energía has a business relationship, including shareholders, customers, partners, suppliers, contractors, agents, consultants and visitors.

** Including directors and agents working on its behalf; as well as its parent companies, shareholders, affiliates and subsidiaries.*



SAAVI ENERGÍA'S COMMITMENTS

- Create a work environment that fosters **ethical behavior** to high standards.
- Create a **culture of integrity** that values honesty, transparency, accountability and whistleblowing.
- Provide the necessary training to **ensure awareness** of this Code of Conduct.
- Respect the **confidentiality of the identity** in the event of a complaint or report.
- Investigate all **reports of misconduct** in a clear and timely manner.
- Consistently apply **disciplinary actions**.
- **Avoid acts of retaliation** against anyone who makes a complaint or report regarding ethics, integrity or violations of this Code of Conduct and/or any policy, guideline or procedure of Saavi Energía.
- **Comply with** applicable national and international anti-corruption **legislation**.

SAAVI ENERGÍA'S LEADERSHIP COMMITMENTS

- Demonstrate, by example, **high standards of performance**. Therefore, they must: Promote compliance with this Code, as well as with the policies and procedures established by the company.
- Encourage employees to **seek advice and guidance** on ethical behavior and conduct in the workplace.
- Be **available and accessible** to solve doubts.
- Promote a **culture of accountability** and timely action to address any suspected or known inappropriate conduct or behavior.
- **Avoid acts of retaliation** against anyone who makes a complaint or report regarding ethics, integrity or violations of this Code of Conduct and/or any policy, guideline or procedure of Saavi Energía.
- **Comply with applicable** national and international anti-corruption **legislation**.

SAAVI ENERGÍA'S EMPLOYEE COMMITMENTS

- Complete the study and training program for full knowledge of the Code of Conduct and other mandatory training assigned on an annual basis, including all applicable Compliance and Anti-Corruption training.
- Ask questions in case of doubt or need for guidance.
- Comply with the rules, laws and regulations governing our business.
- Support and encourage other employees to do the same.
- Keep confidential information of Saavi Energía and/or Third Parties protected.
- Comply with applicable national and international anti-corruption legislation.

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INTEGRITY AND ETHICS

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COMPLIANCE WITH NATIONAL AND INTERNATIONAL LAWS AND REGULATIONS



At all times, we must comply with applicable laws and legal requirements, both international and of each country and local jurisdiction where our operations are carried out.

Conflicts of Interest

- For the purposes of our Code of Conduct, a **conflict of interest** arises when an employee's personal interests take precedence over the interests of Saavi Energy.
- Personal interests** refers to those which belong to the employee, spouse and/or relatives by blood or marriage up to the fourth degree (up to cousins and great-uncles and aunts), as well as third parties (partners and/or friends).
- The overriding of such interests may be due to the possible **receipt of a personal, economic, political or commercial benefit** that generates a breach of the integrity of Saavi Energy's assets.

Being in a situation of potential conflict of interest should not have negative consequences for the collaborator, employee or third party who works for or on behalf of Saavi Energía and is in such a situation, provided that the collaborator, employee or third party makes the corresponding timely notice and/or report and acts in accordance with the provisions of Saavi Energía's Policy for the Prevention of Conflict of

Interest and takes all the necessary measures to ensure that such situation or potential conflict of



interest does not benefit or put the personal benefits of such collaborator, employee or third party before the interests of Saavi Energy.

Some situations that could represent a potential conflict of interest are listed below.



Activities, jobs and external assignments

Participation in civil, educational and charitable activities is acceptable as long as they are done in a personal capacity, during non-working days and hours.

Saavi Energía's inter-institutional relations are the sole and exclusive responsibility of the Corporate Affairs area.



Relationship with clients and vendors

A Conflict of Interest is considered to be the participation through co-ownership investments of the employee or a member of his/her family (up to the third degree of kinship by consanguinity), with any

Organization that has any type of contractual relationship with Saavi Energía.*

It is necessary to avoid any action or decision that may violate the law or the corporate governance system in their business, professional or private activities.



Employment of family members

It is strictly forbidden for direct relatives or similar to work in the same area and line of command. In case of establishing any of these links, a change of area or command must be requested in order to continue working in Saavi Energía and report the fact to your supervisor.





Conflicting internal business objectives

The employee's responsibility and commitment to the company and compliance with ethics and applicable laws is a priority.

Respecting the law is above the achievement of goals; therefore, any action or decision that may violate the law or corporate governance must be avoided and comply with the training requirements provided by the company to understand the scope of this commitment, as well as the consequences of non-compliance.



Relationship with government and public officers

Contact with government officials or regulatory bodies must be carried out under specific rules within the framework of applicable laws and regulations, to avoid inappropriately influencing the decision or outcome of the matter to be discussed.



Collaborator's political activity

Participation in political activities should be conducted strictly on a private, individual basis and outside of working hours.

In no way should the moral or financial support of the company be compromised by participating in political activities.



Gifts and entertaining *

It is prohibited to solicit, accept and/or provide gifts or entertainment to suppliers, business partners, customers and third parties in the cases indicated in the Gifts and Entertainment Policy. In the case of a relationship with the government, it should be considered that such gifts or entertainment may constitute the crime of bribery.

**The Gifts and Entertainment Policy is available on Saavi Energy's internal Governance Site.*

THESE BEHAVIORS CALL INTO QUESTION THE INTEGRITY OF THE ENTIRE ORGANIZATION AND OF THE INDIVIDUAL, IN ADDITION TO CREATING PERSONAL LIABILITY.

Anti-Corruption Policy

Saavi Energía is committed to conducting domestic and international business activities with integrity and will comply with all anti-corruption laws and standards.

The purpose of Saavi Energía's Anti-Corruption Policy is to establish standards and rules in accordance with applicable domestic and foreign anti-corruption laws, including but not limited to the United Nations Convention against Corruption, the OECD Convention on Combating Bribery of Foreign Government Officials, and the Foreign Corrupt Practices Act ("FCPA") of the United States of America, and in particular with the General Law of Administrative Responsibilities ("LGRA" (*Ley General de Responsabilidades Administrativas*), the Federal Criminal Code (*Código Penal Federal*) and other Mexican laws that make up the National Anticorruption System, which we must respect and ensure compliance with.

This policy applies to shareholders, directors, officers, collaborators and/or employees, contractors, consultants, agents or any third party that provides services for Saavi Energía. Or acting on their behalf, regardless of the capacity in which they act, who are required to refrain from engaging, either directly or indirectly, in corrupt activities anywhere in the world.

Situations that may give the appearance of improper conduct should also be avoided.

Bribery and corruption




Saavi Energía's policy is based on a practice of zero tolerance for actions such as:

- **Passive Bribery.** The act of giving, demanding, accepting, obtaining, promising or authorizing money or any benefit to obtain or secure commercial advantages or favors and/or to influence a decision.
- **Active Bribery.** Never offer, give or accept a gift from anyone, anywhere, for any reason, and never have a relationship with a partner, agent or third party that does so, or allows it to be done.
- **Corruption.** Giving or receiving gratuities. It is the return of a part of the transaction with the aim of gaining an advantage or influencing a person's decision.

For more information on these behaviors and our Anti-Corruption Policies, please consult our internal Saavi Energía Governance site.

No Saavi Energía collaborator and/or employee shall pay bribes to any Public Servant or to any entity or individual in the private sector or make them an offer or promise of a bribe in order to influence decisions, obtain or retain business or secure any improper business advantage.

No collaborator and/or employee of Saavi Energía shall offer, promise, make or authorize - directly or indirectly or through any other person or company - any payment of money or objects of value (in the form of compensation, gifts, contributions or in any other form) to:

-  (i) No person or company engaged by or acting for or on behalf of any customer or on behalf of any customer or prospective customer, whether private or governmental, for the purpose of inducing or obtaining any favorable advantage on the part of the customer or prospective customer in any business transaction;
-  (ii) No person or company engaged by or acting for or on behalf of any Governmental Entity (including entities owned or controlled by government or public international organizations, e.g., utilities, universities and hospitals), for the purpose of inducing, securing or obtaining an advantage, through the performance of an act or omission thereof by such entity, in any governmental matter or commercial transaction; and
-  (iii) No Public Officer (including employees of state-owned or controlled entities or public international organizations, e.g. utility companies, universities and hospitals), political parties or officials of such political parties, or any candidate for political office, in order to induce, secure or obtain an advantage, by the performance of an act or omission thereof or by the exercise of any influence in any business transaction or in any governmental matter.

Facilitation Payments are prohibited under this Policy.



No Saavi Energía collaborator and/or employee shall receive a bribe from any person or solicit or agree to receive a bribe from any person for the purpose of influencing decisions, obtaining or retaining business, or securing an improper business advantage.

Saavi Energía has implemented adequate procedures designed to prevent its collaborators and/or employees from committing bribery or other administrative misconduct.

FAILURE TO COMPLY WITH THE ANTI-CORRUPTION POLICY, ITS PROCEDURES AND PROVISIONS, THE MANUAL OF RESPONSIBILITIES AND FUNCTIONS OF SAAVI EMPLOYEES IN ANTI-CORRUPTION MATTERS, AS WELL AS WITH THIS CODE OF CONDUCT, MAY SUBJECT THE SAAVI ENERGÍA COLLABORATOR AND/OR EMPLOYEE TO DISCIPLINARY ACTION INCLUDING TERMINATION OF EMPLOYMENT AND LEGAL PROCEEDINGS, AMONG OTHER CONSEQUENCES.



PRIVATE AND CONFIDENTIAL INFORMATION OF THE COMPANY

This area concerns certain protected information that is developed internally or that is



provided by a partner, agent, supplier, contractor, or other is provided by a partner, agent, supplier, contractor or other, either actual or potential, under conditions of confidentiality.

It is mandatory to respect the ownership of intellectual property and the rights of use and exploitation of the programs, systems, presentations, projects, studies, reports and other works and rights created, developed or used by Saavi Energía in the performance of its functions or based on the information systems of the company or its subsidiaries and affiliates.

Private, confidential information may only be disclosed to outside persons who have a need to know, as in the case of business purposes, upon signature of a confidentiality agreement. The following is prohibited:

- **Discussing confidential information** with people outside the organization.
- **Leaving** confidential records or documents unguarded and at risk of being read by third parties.
- **Extracting documents** containing confidential and proprietary information. The commercialization of private or confidential information is strictly prohibited.

Insider Trading

Unless needed to fulfill their job responsibilities and with the required authorization, no employee, officer or director may disclose non-public or privileged information of the Company. In the event that it is strictly necessary to share it or present it, it must be authorized by Saavi Energía's Chief Financial Officer or Chief Legal Officer.

All employees, officers and directors are prohibited from engaging in stock market transactions involving shares of any company while in possession of inside information.

Violation of the insider trading laws of Mexico, the United States of America or any other country may result in criminal prosecution.

Intellectual Property and Copyright Compliance*

Saavi Energía recognizes and respects the individual property rights of third parties and will comply with its ethical and legal obligations regarding the use of intellectual property.

Copyright laws must be respected, so it is prohibited to create unauthorized copies of protected material that has been developed by Saavi Energía's collaborators and/or employees in the hours paid by the company or through the use of Saavi Energía's resources, during the time of their employment, including any type of software.

**If you have any questions, please contact the Chief Legal Officer Office.*

Antitrust Requirements

Saavi Energía's policies are based on compliance with all antitrust laws in force in the countries where we operate. The purpose of these is to ensure the continuity of a free and competitive economy.

Accounting Practices and Accounting Records Management

All transactions must be properly recorded, classified and summarized in accordance with established internal policies, which comply with accounting principles generally accepted by all applicable laws and regulations in Mexico, the Netherlands, the United States of America and in all countries in which we operate.

The company's records include, but are not limited to, revenue cards, expense, financial and operating reports, cost estimates, journal entries, operating, engineering and safety records, contracts, among others.

Data Holding

Saavi Energía protects and maintains the records necessary to comply with the legal and regulatory requirements of the jurisdictions in which it operates. Destruction of these, after the initiation of an investigation or during the prosecution of criminal charges, may itself constitute a crime.

Everyone is responsible for the management of the records under their control, thus, all documents that are generated, regardless of whether they are kept in file cabinets, computers or any type of electronic device, owned by the company, in the office or at home, are the property of Saavi Energía and cannot be shared or disclosed.

Internal Controls and Asset Protection

Saavi Energía's internal policies and procedures protect collaborators and/or employees from fraudulent activities in the handling of assets, documents and other areas of the company that are subject to any misconduct addressed in this Code.



Therefore, it is necessary to:

- Acquire assets in accordance with Saavi Energy's Delegation of Authority and other related policies and procedures.
- Use company information and property only for business purposes achieved in an ethical and lawful manner.
- Safeguarding assets against damage, waste, loss, misuse and theft.

Company assets such as computers, telephones, cell phones, copiers, facsimiles, are to be used exclusively for purposes consistent with job responsibilities. The use of other company-owned assets, such as vehicles, construction equipment and tools, is not permitted for personal purposes.

Saavi Energía reserves the right to examine and review equipment that is the property of the company and that of the collaborator within the company's facilities. Therefore, Saavi Energía as owner of the computer equipment may at all times have access to them and to the personal information available on them.

Donations, Improvements and Sponsorships

In compliance with the Anti-Corruption Policy, Saavi Energía has issued the Anti-Corruption Procedure for the Approval of Donations, Improvements and Sponsorships which describes the guidelines to be followed in relation to the notification and approval of: (i) Donations and/or Improvements made by Saavi in favor of a Beneficiary and (ii) the Sponsorship of events or of a Beneficiary.

A donation is a contribution of funds, goods or services provided as part of a corporate social investment or corporate social responsibility initiatives at no cost in order to support a charitable cause, individuals or groups in need, or to provide immediate and direct benefit or enhanced services to members of the community. Such donations include payment for materials or services rendered. Donations may be made to Governmental Entities or Non-Governmental Entities.

Donations to Government Entities may also include volunteering for the benefit of Government Entities (such as volunteering for the benefit of government-controlled or government-owned community centers, parks, schools, libraries, shelters and hospitals).

Donations of cash and cash equivalents (e.g., a gift certificate or coupon, gift card, stock or bond) are prohibited.

Donations to individuals are also prohibited with the exception of the scholarship program. Donations or contributions to politicians, campaigns or political parties are prohibited.

Finally, in no case may donations include payments to third parties or suppliers that claim to have performed services that are not on record for Saavi Energía or that have been performed prior to Saavi Energía's involvement in such donation process.

For the purposes of this Code and the Anti-Corruption Procedure for the Approval of Donations, Improvements and Sponsorships, an improvement shall be considered to be those works and/or works that are carried out on public roads or on property in the public and/or private domain at no cost to the Beneficiary.

Improvements shall be:

1. Required by law;
2. Requested by a governmental entity (including municipalities, planning commissions or other authorities);
3. Required by Saavi as part of the executive plan of a project; or
4. Necessary for the operation of a project, either during construction or after the opening of the plant. Any of the works executed may be for the benefit of Saavi Energía, the community, or both.

Sponsorship refers to the contribution made by Saavi Energía, in cash or in kind, to support an initiative or activity organized by a third party in exchange for a public display of Saavi's trademarks or logos or other commercial benefits.

Due Diligence

In order to support Saavi Energía's commitment to Integrity, one of our core values, and to establish the minimum standards of Due Diligence required to do business with Third Parties, Saavi Energía has issued its Policy establishing a complete Due Diligence Procedure (Due Diligence) with respect to a prospective Third Party to establish contractual and commercial relationships with duly qualified Third Parties who have the necessary experience to ensure compliance with applicable legal obligations and who adhere to the principles of ethics, transparency, discipline, legality, objectivity, professionalism, honesty, loyalty, impartiality, integrity, proper accountability, effectiveness and efficiency and in general, any activity for the proper conduct of business, in the exercise of their activities.

The full Due Diligence procedure is essential for a thorough evaluation of any Third Party proposal. It is essential to ensure compliance with this Code of Conduct, as well as with Saavi Energía's policies and compliance with Mexican law, including the National Anti-Corruption System and the Federal Law for the Prevention and Identification of Operations with Illicit Proceeds, as well as with applicable international law, including, without limitation, the Foreign Corrupt Practices Act ("FCPA") of the United States of America.

Due Diligence: Refers to the review and investigation process that includes but is not limited to (i) obtaining a background check report and/or searching the names of the Beneficiaries, their partners or shareholders, administrators on governmental lists such as Politically Exposed Persons List, Sanction Lists, Specially Designated Nationals List, Watch Lists: Embargo and Caution Lists (FBI, World Bank, Interpol, etc.), Denied Persons List, Unverified List, Entity List and Debarred Lists; (ii) conducting an electronic media review including searches of internet servers to identify potentially adverse information regarding allegations of corruption, collusion, other illegal activities or other matters that could have a material impact on the Company's reputation and/or reputational integrity and/or (iii) request additional due diligence including an external legal opinion for certain specific cases.

The aim of this procedure is to examine potential business relationships with a Third Party in order to perform a risk analysis, make informed decisions and comply with applicable laws.

Failure to properly vet Third Parties, such as customers, business partners, suppliers, consultants, intermediaries, including agents, without knowing who they are and how they operate, as well as their reputation, could expose Saavi Energía to reputational damage, operational risk, regulatory compliance, monetary penalties and potential administrative and criminal liability.

The standards of our Due Diligence Policy and Procedure are designed to ensure that both Saavi Energía and the Third Parties with which it enters into commercial and contractual relationships comply with applicable legal obligations and that it only conducts business with Third Parties that are legally and ethically acceptable, avoiding any type of conflict of interest, acts of corruption or interaction with Third Parties that represent a potential risk to Saavi Energía.

In this regard, once the Third Party with which it intends to establish commercial and/or business relations has been identified, the Business Proponent or User Area must follow the procedure established by Saavi Energía's Compliance Department for a proper review and due diligence process of said Third Party.

Investigations and ethics reports

Reported violations will be investigated confidentially and, if necessary, anonymously and appropriate action will be taken in accordance with applicable procedures.

Making a false accusation will result in a disciplinary action.



ANY QUESTIONS OR SOMETHING TO REPORT?

All employees are responsible for reporting any conduct that goes against this Code, laws or external provisions, as well as Saavi Energía's internal policies and procedures.

Training in the guidelines of the Code of Conduct, the Anti-Corruption Policy and other Saavi Energía Compliance policies must be followed, complied with and respected by any person or employee working for or representing Saavi Energía.

Collaborators and/or employees who work with third parties, whether suppliers, customers, business partners and/or agents, must inform, ensure and require these third parties' confirmation and acceptance of compliance with both the Code of Conduct, the Anti-Corruption Policy and other policies, guidelines and procedures on Compliance.

Likewise, Saavi Energía's collaborators and/or employees must take the necessary measures and make the corresponding report, after learning or having the suspicion that a third party has breached this Code of Conduct, as well as any other Saavi Energía's Compliance policy and/or has violated any applicable legal provision.



Bajío

2



SAFETY

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DECISION**

#WeAreSaavi



Health, Safety and Environment (HSSE)

Saavi Energía is committed to providing a safe and healthy place to work while proactively protecting the environment through an environmental stewardship plan.

The HSSE program complies with all international, federal, state and local laws and regulations where we operate.

It is important to note that at Saavi we have a Psychosocial Risk Prevention Policy whose objective is to promote the continuous improvement of working conditions that contribute to the prevention of psychosocial risk factors, the prevention of workplace violence and the promotion of a safe and favorable organizational environment for the development of its employees.



Health, safety and environment are at the heart of our business.

Hazardous and non-hazardous substances handling

Regarding the handling of hazardous and non-hazardous substances, their use, storage, handling, transportation or disposal must be done in compliance with all environmental laws and enforced on behalf of Saavi Energy.



Substances abuse

It is prohibited to report to work under the influence of harmful substances (drugs, alcohol, narcotics, among others) and that alter the nervous system or any sense, as they compromise operational safety and increase the risk to all employees, contractors and visitors of Saavi Energía, in addition to being a breach of labor legislation.

Saavi Energía encourages its personnel who are affected by the use of drugs and alcohol to seek help through the Employee Assistance Program.



Workplace violence

Saavi Energía condemns any type of violence in the workplace by or against our employees. This includes, without limitation, harassment, stalking, physical violence, use of any type of weapon and direct or indirect threat of aggression directed towards any person or facility.

We reject any conduct with lewd purposes towards a person of either sex, using a hierarchical position, as these behaviors are punishable by labor legislation.

3



**EQUALITY,
DIVERSITY AND
INCLUSION.**

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#WeAreSaavi



Equality, Diversity and Inclusion

For Saavi Energía, generating an environment based on Equality, Diversity and Inclusion is an ethical imperative. We are convinced that diversity plays a fundamental role and is a great strength for our company, since it allows us to attract and retain the best talent, enables us to enrich and promote innovation through the skills and experiences that our employees have and finally helps us to create a work environment where people can fully develop.

We value diversity and the richness provided by the different points of view, talents and experiences of the people who work at Saavi.

At Saavi Energía we have an Equality, Diversity and Inclusion Policy whose objective is to promote equal treatment and opportunities for all the people who are part of our company. *Violence Prevention, CONAPO, Mexico.



Equal opportunities

Saavi Energía's commitment to its employees is to foster a respectful work culture and environment, where all people have the same opportunities for development, based on merit and professional and personal competencies, regardless of their origin, distinctions and characteristics of any kind.



Fair treatment and respect

We are committed to and encourage our collaborators to create an inclusive culture based on respect where each person contributes from his or her own identity and is valued, recognized and accepted. In this sense, the involvement of our collaborators and/or employees with the organizational culture is fundamental, in which we guarantee fair and respectful treatment, regardless of the position they hold in the company.



Human Rights, Harassment and Non-Discrimination

At Saavi Energía we guarantee that all our actions are carried out with full respect for the human rights of all people with whom we interact. To this end, we have a Human Rights Policy that establishes due diligence and periodic review of risks in which we must: anticipate, prevent, avoid and, if necessary, repair human rights impacts on any person derived from the company's operations.

We reject any type of arbitrary discrimination of people, whether for reasons of gender, sexual orientation, disability, social origin, nationality, age, race, political affinity or religious beliefs, among employees, customers or any other group with which we interact.

At Saavi we promote the integral development and full participation of men and women. We reject any conduct that threatens self-esteem, health, integrity, freedom, safety and equality of people. These actions mean: physical violence, use of weapons, direct or indirect threats, psychological and digital violence, harassment, abuse of power and harassment at work.

We reject any type of gender-based violence, one of these being sexual harassment, which implies any request of a sexual nature made by a man or woman, not consented to by the affected person.

It is the duty of all employees to respect the labor rights and human rights of all people.



Bajío

Definitions to take into account:

Below are some concepts and definitions that contribute to a comprehensive understanding of the importance of building an inclusive culture.

Discrimination

Any distinction, exclusion or restriction that, based on ethnic or national origin, sex, age, disability, social or economic condition, health conditions, pregnancy, language, religion, opinions, sexual orientation, marital status or any other, has the effect of preventing or nullifying the recognition or exercise of rights and the real equality of opportunities of persons.

**General Law for the Equality of Men and Women, General Congress of the United Mexican States (Ley General para la Igualdad de Hombres y Mujeres, Congreso General de Los Estados Unidos Mexicanos)*

Gender-based violence

Refers to harmful acts directed against a person or group of people because of their gender. It is rooted in gender inequality, abuse of power and the existence of harmful norms. The term is used primarily to highlight the fact that structural gender-based power differentials place women at risk of multiple forms of violence, but men can also be targets of violence.

**Frequent questions: Key terms. ONU WOMEN*

Sexual harassment

It is a form of violence in which, although there is no subordination, there is an abusive exercise of power that leads to a state of defenselessness and risk for the victim (man and/or woman), regardless of whether it takes place in one or several events. Sexual harassment may be physical, involving contact, or by other means, for example, verbal, e-mail, letters, etc.

**General Law on Women's Access to a Life Free from Violence (Ley General de Acceso de las Mujeres a una Vida Libre de Violencia)*

Sexual harassment

It is the exercise of power, in a relationship of real subordination of the victim to the aggressor in the workplace. It is expressed in verbal or physical conduct, or both, related to sexuality with a lascivious connotation.

**General Law on Women's Access to a Life Free from Violence.*

It is defined as a crime and considers as a sexual harasser anyone who repeatedly assaults women or men of any age for lascivious purposes, taking advantage of a superior hierarchical position derived from relationships.

**Article 259bis of Federal Criminal Code of the United Mexican States*

Psychological violence

Itself as a long process in which the victim does not realize that the aggressor is violating his or her rights, since this type of abuse is subtle and difficult to detect.

It encompasses a series of behaviors aimed at undermining a person's self-esteem.

It includes actions of belittling themselves and their ideas, insults, threats, criticism of what they do and the way they do it, mockery, rejection, humiliation, indifference, unfavorable comparisons with other people, not talking to the person, highlighting defects, offensive nicknames, among others.

These actions lead the victim (male and/or female) to depression and isolation.

**Violence Prevention, CONAPO, Mexico*

Digital or media violence

It is any fraudulent action carried out through the use of information and communication technologies that exposes, distributes, disseminates, exhibits, transmits, commercializes, offers, exchanges or shares real or simulated images, audios or videos of intimate sexual content of a person without their consent (male and/or female), without their approval or without their authorization and that causes them psychological or emotional harm, in any area of their private life or in their self-image.

**General Law on Women's Access to a Life Free from Violence*

CONCLUSION

At Saavi Energía we have an absolute commitment to integrity, ethics and transparency. Saavi Energía, including our internal and external collaborators, business partners, customers and suppliers, adhere to the highest standards of ethics and business conduct, so we are all obliged to comply with these guidelines.

By carrying out responsibilities on behalf of the company, all personnel are jointly responsible for encouraging others to ask questions, seek support, express concerns and report suspected violations of the standards of conduct set out in this Code and any policies, guidelines and procedures issued by Saavi Energía, as well as potential violations of applicable legal provisions or other potentially improper actions.

Internal and external collaborators, business partners, customers and current and future suppliers expressly accept the action policies that apply to them, as established in this Code of Conduct, as well as

shall comply with applicable laws and other Saavi Energía policies that apply to them according to their functions.

Therefore, after receiving the corresponding training, the

corresponding form of acknowledgement and acceptance of compliance with Saavi Energía's Code of Conduct must be submitted to the Human Resources and/or Purchasing area (Supplier Management), which will be provided by said area, as appropriate.

Likewise, at Saavi Energía encourage and promote continuous and good faith reporting from our internal and collaborators, as well as from any third party with whom Saavi has a relationship, in the event of any possible violation of our Compliance policies, Code of Conduct and applicable legal provisions. We also encourage the submission of concerns regarding integrity and ethics, through the various channels we have open for this purpose, which guarantee confidentiality and anonymity to those who submit these concerns and / or ethics reports.



Chihuahua

DO YOU HAVE SOMETHING TO REPORT?

ANY DOUBT AS TO WHETHER CERTAIN BEHAVIOUR IS UNETHICAL?

**ANY CONCERN OR QUESTION ABOUT SAAVI ENERGÍA'S COMPLIANCE
POLICIES OR CODE OF CONDUCT?**

ARE YOU NOT SURE IF A BEHAVOIR IS ILLEGAL?

**DO YOU WONDER WHETHER IT GOES AGAINST YOUR PRINCIPLES OR
VALUES?**

If the answer is yes, or if you have any doubts, refrain from doing that conduct and call Saavi Energía's Ethics Hotline and/or contact the Chief Compliance Officer immediately.

The Saavi Energy Ethics Hotline is available to you 365/24/7!

Toll free

800 043 8422

Web site

<https://lineaeticasaavi.com>

E-mail

reporte@lineaeticasaavi.com

With the support and responsibility of its employees, Saavi Energía reaffirms every day its absolute commitment to integrity, ethics, legality and transparency.

CODE OF CONDUCT



WE ACT WITH
INTEGRITY!