



## EL GRAN BAJÍO CODE OF ETHICS AND CONDUCT

### INTRODUCTION

**OBJECTIVES OF THIS DOCUMENT:** To establish the fundamental principles and standards that guide our ethical behavior in our relationships with our shareholders, clients, suppliers, authorities, civil society organizations, the environment, community, and everyone who interacts with Estrategias de Negocio, Tecnologías e Inversión S.C., hereinafter referred to as **EL GRAN BAJÍO**.

Likewise, to make known the ethical line of **EL GRAN BAJÍO**, through which any behavior, non-compliance, or practice that does not adhere to the provisions of this document can be reported.

All of the above within the framework of **ESG** parameters, which refer to environmental, social, and corporate governance factors that companies consider in their operations and decision-making today.

**Environmental:** ESG-conscious companies seek to minimize their environmental footprint and adopt sustainable practices. This includes energy efficiency, greenhouse gas emissions, water management, conservation of natural resources, and waste management.

**Social:** Social factors include fair labor practices, diversity and inclusion, health and safety at work, human rights, and community relations. This aspect focuses on how a company manages relationships with its employees, clients, suppliers, local communities, and society at large.

**Corporate Governance:** Good corporate governance involves transparent and ethical management, as well as decision-making that balances the interests of all stakeholders, such as shareholders, employees, and society at large.

### EL GRAN BAJÍO Code of Ethics and Conduct

1. Our Code of Ethics and Conduct applies to members of the Board of Directors, employees, and anyone acting on behalf of **EL GRAN BAJÍO**.
2. This Code of Ethics and Conduct is not exhaustive nor does it claim to be. Therefore, unforeseen situations will be resolved according to criteria of best management practices and corporate governance.

3. Additional topics arising from various business situations and the dynamics of the environment will be incorporated as necessary. At **EL GRAN BAJÍO**, we are committed to transcending with our actions and conduct based on the values that distinguish us in our organization. These values guide us daily in decision-making to generate actions of value.

## **ABOUT US**

At **EL GRAN BAJÍO**, we are a Business Promotion Agency (Reliable Mexican Companies) that promotes a global business agenda (investment seminars, fairs, forums, summits, business meetings, and select opportunities) through a network of prestigious alliances (agencies) and a strategic positioning (based on a structured methodology). We are comprised of businesswomen and businessmen who promote the Bajío region as the best in Latin America for future economic development.

We are directed and operated by individuals committed to the highest standards of conduct in the performance of their duties, especially in their relationships with members, suppliers, society, the environment, and authorities in general. This is achieved by setting a good example and conducting these businesses in accordance with the applicable regulatory framework, rules, and codes of ethics and conduct.

This regulation provides **EL GRAN BAJÍO** employees with the relevance of ethical values and principles that should govern their conduct in the performance of their duties.

## **OUR MISSION AND VISION**

**Mission:** To position the companies and entrepreneurs who are members of **EL GRAN BAJÍO** at a national and international level, thereby consolidating the entire Bajío region as the best region in North America for investment attraction and future industrial development.

**Vision:** To position **EL GRAN BAJÍO** as the strongest business group in North America within 5 years under a future-oriented business agenda.

**Philosophy:** To empower a business community to earn more, exert less effort, and have a better quality of life through a global and future-oriented business agenda.



## STRATEGIC OBJECTIVES

- To become the strongest business group in North America under a future-oriented business agenda.
- To be the gateway between North America, the Middle East, and Asia.
- To be leaders in our markets.

## INTEGRITY AND RESPECT

We are integral in our behavior and maintain a respectful and dignified treatment towards all individuals.

## OUR VALUES

1. **RESPONSIBILITY EL GRAN BAJÍO** is committed to its members, allies, the community, and the environment, all of which are part of the organization. We carefully consider each action for the benefit of all.
2. **TEAMWORK EL GRAN BAJÍO** has developed strategic alliances with entrepreneurs, institutions, and professionals to carry out actions in the most effective manner.
3. **CONTINUOUS LEARNING EL GRAN BAJÍO** seeks to stay at the forefront of innovative topics, new methodologies, schools, and global trends to apply them in all aspects of its operation.
4. **COMMITMENT TO EXCELLENCE EL GRAN BAJÍO** always seeks to improve the value proposition and experience for our members to provide them with excellent service.

## PRINCIPLES

1. **Pioneering the Way** The Bajío region has not only outlined the path of design at a national level but also on a continental and global scale. **EL GRAN BAJÍO** has positioned itself as the main driver of business direction in the region.
2. **A Role Model** With the most outstanding development indices in Latin America, the Bajío region is governed as a strategic model of solid prosperity. **EL GRAN BAJÍO** is positioned today as a role model in terms of sustainable development.
3. **Robust Foundations** With over 300 years of history, the Bajío region has maintained a continuous model of prosperity and development. **EL GRAN BAJÍO** demonstrates a strength grounded in a long tradition of economic success.
4. **Cutting-Edge Vision** **EL GRAN BAJÍO** is not only visionary but also future-oriented, understanding the present and agilely adapting to major

transformations. In a constantly changing world, the region stands out for its ability to anticipate trends and lead the way towards progress.

### ***Parameter ESG, Environmental***

At **EL GRAN BAJÍO**, we are aware of the environmental risks associated with energy use, water consumption, and non-recyclable materials. Therefore, we encourage effective management of materials and promote waste mitigation in our operations.

1. We are committed to reducing the environmental impact as a social responsibility.
2. We promote the use of clean and renewable energy sources.
3. We encourage the efficient use of water and office materials.
4. We promote the use of recycled materials.

### ***Parameter ESG, Social***

**OUR CULTURE** A collaborator at **EL GRAN BAJÍO** aims to create a lasting impact, generating the greatest welfare for the organization while always prioritizing established values.

The work ethic of our employees should always reflect ethical conduct, working with **EL GRAN BAJÍO's** distinctive strategies, and adhering to the UN Declaration of Human Rights based on freedom, justice, and peace, promoting equity and social progress to improve the community's standard of living.

We promote the best work environment where any form of harassment, violence, or bullying is not tolerated. We sanction these actions that undermine the dignity and respect of employees.

At **EL GRAN BAJÍO**, we are committed to promoting the organization's and employees' growth, where innovation, leadership, and integrity are the main drivers of change within our team. Our team is continuously updated on innovation, political, and economic schemes to deliver the best results for the organization.

In cases where **EL GRAN BAJÍO** cannot fulfill a responsibility objectively due to pressures from third parties misusing their position, authority, or influence, **EL GRAN BAJÍO** will immediately inform its members and allies of the cancellation of the commitment.

The safety and physical integrity of our employees are paramount to us, and we take the following actions to ensure safety and health in the workplace:

- a) Provide and maintain safe and healthy workplaces.
- b) Provide and maintain a suitable working environment.
- c) Develop a safety culture among the staff.
- d) Provide the necessary tools to perform the required work.

### **HUMAN RIGHTS**

At **EL GRAN BAJÍO**, we recognize that the Declaration of Human Rights represents a common ideal that all peoples and nations should strive to create the best work culture.

1. We promote freedom, justice, and peace as the foundation of the intrinsic dignity of human rights.
2. We respect the dignity of individuals, their freedom, and their privacy.
3. We do not tolerate any form of aggressive verbal, physical, or visual behavior that undermines the dignity and respect of another person, regardless of status.
4. We are an inclusive company where the diversity of our employees is celebrated, and no discrimination, distinction, exclusion, restriction, or preference is made that is not objective, rational, or proportional, without distinction of race, color, sex, marital status, age, opinions, language, religion, political opinion, or any other kind, national origin, economic or social status, birth, creed, tribe, association or union affiliation, ethnicity, gender identity, sexual orientation, health condition, disability, or any other condition.
5. We encourage all employees to express their opinions freely without fear of reprisal, as long as they do not violate any of the conditions mentioned above or disrupt the harmonious environment we promote.
6. We oppose forced labor and child labor and comply with applicable laws regarding the hiring of minors.

### **COMMITMENT TO OUR COMMUNITY**

**EL GRAN BAJÍO** recognizes its commitment to the community and its entrepreneurs to generate valuable actions. Our training and dialogues are focused on creating positive actions for the region and updating our members on environmental, social, and governance agenda topics to comply with international compliance and labor responsibility standards.





We establish strategic partnerships with civil society organizations and other entities aimed at enhancing the social impact of our community actions.

### **ESG Parameter, Corporate Governance**

#### **INFORMATION MANAGEMENT**

All employees and suppliers of EL GRAN BAJÍO are required to sign a confidentiality agreement, safeguarding the well-being of our clients. Information from EL GRAN BAJÍO, allies, or members is strictly prohibited from being shared for personal purposes.

The name, logo, and brand of EL GRAN BAJÍO must be used according to the Brand Guide published on [www.elgranbajio.com](http://www.elgranbajio.com). Any alteration or misuse could result in legal repercussions.

Misuse of Information All employees are aware that the information they have about clients, suppliers, or allies is for work purposes only, and any misuse of this information to gain any type of benefit is strictly prohibited and may result in legal sanctions.

Behavior at **EL GRAN BAJÍO**-related events Employees are expected to behave professionally at work and at events related to work, including social events. We establish clear standards for our people and ask them to act with the utmost integrity and honesty in all their personal and business dealings. These behavioral standards apply when dealing with colleagues and clients, both on and off the premises, including at social and corporate events. All **EL GRAN BAJÍO** employees have the personal responsibility to uphold the institution's values. If you attend a work-related event, you are personally responsible for your behavior standards at that event. We also expect that if you see someone behaving unprofessionally, you should speak up and intervene. If you cannot intervene, you should seek assistance from a colleague or higher authority. It is important to note that any violation of the Code of Conduct may result in disciplinary measures, including termination.

**EL GRAN BAJÍO** does not prohibit responsible alcohol consumption at work-related events; however, we do not advise excessive alcohol consumption. Alcohol consumption is never an excuse for misbehavior. Therefore, we expect our employees to always adhere to the values of **EL GRAN BAJÍO**.

Fraud All employees must be vigilant and work according to the parameters established in this code of conduct to prevent any kind of fraud, theft, bribery, or illegal activities within the workplace, including at **EL GRAN BAJÍO** events. If you believe that



someone has committed fraud or acted dishonestly against any **EL GRAN BAJÍO** employee, it is important to report it to the reporting line.

### **Bribery and Gifts**

As a general rule, any **EL GRAN BAJÍO** employee is prohibited from offering, making, seeking, or accepting gifts, payments, attentions, or services from suppliers, clients, allies, whether current or prospective, as this could affect the relationship and create a conflict of interest. Any attempted bribery must be reported to **EL GRAN BAJÍO** administration as it may be considered a crime.

All employees are prohibited from accepting gifts from clients, suppliers, or associates as it may be considered bribery, affecting the professional relationship. Only gifts with a value exceeding \$100 USD and/or promotional items within the usual limits of courtesy such as stationery items like pens, notebooks, lighters, calendars, among others, may be accepted.

### **Workplace Relationships**

Interpersonal relationships at work are not prohibited among employees; however, we ask that professionalism be maintained at all times. It must be notified to [miembros@elgranbajio.com](mailto:miembros@elgranbajio.com) if such a relationship occurs, to confirm that it is a consensual relationship by both parties. If any employee or superior is misusing their power to engage in a romantic relationship, it must be reported. In the case of a relationship with a superior or within the same team, a hierarchical position evaluation will be required to avoid conflicts of interest.

### **Privacy Notice**

The Privacy Notice will be available to the Data Subject at all times, prior to the processing of their personal data on the homepage [www.elgranbajio.com](http://www.elgranbajio.com), in accordance with Article 15 of the Federal Law on Protection of Personal Data Held by Individuals.

### **Data Privacy Audit**

**EL GRAN BAJÍO** will conduct an exhaustive review of data privacy once a year for the current year and take corrective actions as necessary.

**Complaint Policies** The administrative assistant on duty is responsible for receiving, channeling, and following up on any type of complaints received. The designated collaborator must act impartially and responsibly regarding any complaint, conduct

the relevant investigation, notify the Board of Directors of **EL GRAN BAJÍO**, and take the appropriate corrective action.

At **EL GRAN BAJÍO**, we encourage all our collaborators, associates, or suppliers to report any non-compliance with internal rules and laws that could affect or impair the proper performance of any activity.

**EL GRAN BAJÍO** provides the email [denuncias@elgranbajio.com](mailto:denuncias@elgranbajio.com) for any situation that generates a conflict for any of the parties, so that management can take corrective actions.

**EL GRAN BAJÍO** will review the complaints received and corrective actions taken in June and December of each year and present them to the Board of Directors for their awareness and to raise awareness of the situation.

### **Consequences of Non-Compliance with this Code of Ethics**

Non-compliance with the Code of Ethics of **EL GRAN BAJÍO** will be addressed with corrective actions based on the severity of the matter, which may include a discussion with Human Resources, a written report of the violation, training on a specific topic, termination of employment, or legal action.

### **Board of Directors**

The Board of Directors is composed of the Co-founders of **EL GRAN BAJÍO**, Federico Quinzaños, Julio Di-Bella Roldán, and Marcelo López Sánchez. The Board of Directors will be supported and moderated by the designated administrative assistant, as well as addressing any non-compliance with this code.

Creation date: September 2022

Last update: December 2023

This code will be updated once a year based on the results, with December being the deadline month for its review.





## Letter of Commitment

As a collaborator, I hereby acknowledge that I have received, read, and accepted the behavioral guidelines outlined in the **EL GRAN BAJÍO** Code of Ethics and Conduct. I commit to conducting myself strictly in accordance with this Code in order to preserve the trust that users, collaborators, and **EL GRAN BAJÍO** have placed in my actions. Furthermore, I pledge to adhere strictly to the principles, values, and integrity rules contained in this document.

I understand the importance and scope of the Code of Ethics and Conduct for **EL GRAN BAJÍO**, and I confirm that there are currently no conflicts of interest or situations that would prevent its compliance.

I commit to following the rules that govern my actions, promoting their compliance, performing my duties with a service-oriented attitude and under the established normative principles. Additionally, I pledge to report any irregularities, acts, or omissions contrary to this Code while I am providing my services at **EL GRAN BAJÍO**.

Having read this Letter of Commitment and understood its content and scope, it is signed on Date: \_\_\_\_\_

\_\_\_\_\_  
Full name,  
Position, and Signature