



# Mexlog Code of Conduct



## **CODE OF ETHICS AND BUSINESS CONDUCT**

### **AGUILAS DE DESIERTO DE BAJA CALIFORNIA S.DE R.L. DE C.V.**

#### **I.- COMMITMENT**

At Águilas del Desierto de Baja California, S. de R.L. de C.V. ("ADD"), acting with integrity is essential in our day-to-day work. Doing so is crucial to the continued success of ADD and to creating a workplace where our people can thrive.

We are committed to providing high-quality service in the transfer of tractor-trailers, transportation of new vehicles, yard management, and logistics-related services, with the highest standards of quality, efficiency, and reliability to meet and exceed our clients' expectations.

Our Code of Ethics and Business Conduct ("Code") establishes the set of rules and practices that must be followed by all executives, administrative personnel, operational staff, and drivers of our company at all levels of responsibility, in order to fulfill our commitment to customer satisfaction.

This Code provides guidance on what is expected of all of us as members of ADD and helps address any dilemma, question, or concern that may arise regarding ADD's business conduct.

Adhering to ethical principles and compliance in our business relationships and decision-making builds our culture and reputation. By aligning our business practices with a set of core principles, we promote a culture of ethics and compliance based on trust—one in which both ADD and our employees can succeed.

Focusing on ethics and business conduct also helps us avoid risks. Misconduct can have serious consequences for us, our company, and third parties, including significant fines, criminal penalties, and business, legal, and/or disciplinary actions.

#### **II.- SCOPE.**

Our Code applies in all ADD locations wherever we operate. This document is public and its guidelines apply to:

- a) Executives
- b) Employees (administrative and operational)
- c) Drivers
- d) Clients
- e) Suppliers
- f) Consultants

Any executive, employee, driver, client, supplier, or consultant of ADD, by virtue of their relationship with the company, assumes the obligation to respect and align their conduct and activities with the provisions contained in this Code.

Since specific situations not contemplated by this Code may arise, it will serve as a guide for evaluating both expected and unforeseen issues and for resolving questions about its application. In cases not specifically covered, we must adhere to other ADD policies, the Internal Work Regulations, or applicable laws, always keeping our values in mind when making decisions.

### III.- DEFINITIONS.

For better understanding and interpretation of this Code, the following definitions apply:

- a) **Company and/or ADD:** Águilas del Desierto de Baja California S. de R.L. de C.V.
- b) **Assets:** The property and resources owned by ADD.
- c) **Client:** Any individual or legal entity that contracts ADD's services.
- d) **Conflict of Interest:** Any situation in which an employee or driver, by virtue of their position at ADD and using its time and resources, obtains personal benefits or business advantages for themselves or for family members (by blood or otherwise) up to the fourth degree.
- e) **Disclose:** To publish, reveal, transmit, or share by any means with a third party any information or documentation belonging to ADD.
- f) **Employee:** Any individual with an employment contract with ADD, whether temporary, project-based, or indefinite.
- g) **Information/Documentation:** Any information, whether written, verbal, magnetic, or electronic, including methods, data, experience-derived knowledge, technology, legal, financial, contractual, operational, technical, and accounting information, and any other confidential information related to company activities. This includes definitions established in confidentiality agreements between ADD and its employees, clients, or suppliers.
- h) **Quality Policy:** We provide logistics, transfer, and vehicle transportation services in a timely, efficient, and reliable manner, supported by a highly trained, professional, and committed team that exceeds the expectations of our internal and external clients, suppliers, and shareholders through continuous improvement.
- i) **Intellectual Property:** All materials, programs, or systems developed or used by ADD related to its operations, administration, processes, methods, plans, clients, systems, projects, and any other elements used by the company to fulfill its activities, including marketing, sales, logistics strategies, routes, rates, security procedures, accounting or financial information, and equipment or system data. This also includes definitions set out in confidentiality agreements between ADD and its employees, clients, or suppliers.
- j) **Supplier and Consultant:** Individuals or entities contracted by ADD to provide materials, equipment, spare parts, or professional services, among others.
- k) **Service:** Transfers, transportation, and logistics.

### IV.- FOUNDATIONS.

ADD bases its conduct on the following ethical values:

- a) **Integrity:** Acting with honesty, responsibility, transparency, and professional ethics in all interactions.
- b) **Respect:** Acting with consideration, empathy, and appreciation toward people, processes, assets, and the environment to ensure social, workplace, and commercial harmony.
- c) **Service:** Performing actions and activities aimed at meeting and exceeding client expectations through dedication and commitment.
- d) **Loyalty:** Acting faithfully to ADD's ethical, legal, and moral principles and commitments.
- e) **Creativity:** Seeking improvement and challenging paradigms.
- f) **Solidarity:** Working as a team to achieve business goals through the quality policy.
- g) **Punctuality:** Fulfilling work obligations and commitments.

### V.- RULES AND PRINCIPLES.



It is the obligation of every employee, client, supplier, or consultant associated with ADD to know, understand, and comply with this Code of Ethics and Business Conduct. Noncompliance will result in corrective actions, including:

- For employees: verbal/written warnings, suspension, or termination.
- For clients, suppliers, or consultants: termination of business relationships.

#### **a) Health and Safety.**

Health and safety are our priorities, and it is necessary that we look after ourselves and others. We must be prepared to act when we see or become aware of a safety or health risk.

We must carry out all our work and business activities in a safe and efficient manner, complying with all applicable regulations, laws, policies, practices, systems, and procedures, ensuring that we protect everyone at our sites and others who could be affected by our activities.

No action or decision is so important that it justifies sacrificing the health and safety of ourselves, ADD personnel, or our stakeholders.

Employees, clients, and suppliers are required to stop any work or condition they consider unsafe. Suppliers must be certified and committed to health and safety standards. Managers are responsible not only for the health and safety of their operations and for ensuring compliance with our safety and health policies but also for showing visible commitment by making this a top leadership priority.

ADD provides its personnel with the procedures, training, and personal protective equipment needed to perform their work safely. We are all responsible for following these procedures and using the protective equipment correctly at all times.

If your position requires you to coordinate the services of third parties (e.g., suppliers), you must ensure that they follow the same health and safety rules and expectations that apply to ADD personnel.

#### **b) Human Rights.**

Respect for human rights is embedded in the way we conduct business and deliver our services. We support and respect the protection of human rights principles proclaimed nationally and internationally, as expressed in the Political Constitution of the United Mexican States, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

We will not tolerate any violation of human rights within our operations, supply chain, or collaborations, and we take any accusation that ADD has failed to fully respect human rights very seriously.

We are also committed to complying with all applicable laws regarding wages and working hours that govern our work and services. We will never use or condone the use of forced labor or child labor.



We likewise respect the right to freedom of association and the right to work in a safe, healthy, and humane environment.

Furthermore, we commit to comply with, follow, and implement ADD's Protocol for the Prevention of Gender-Based Discrimination and for the Attention of Cases of Violence, Harassment, and Sexual Harassment.

**c) Harassment and Respect in the Workplace.**

We will not tolerate any form of harassment. Respecting others means being mindful of how we treat and communicate with people.

Remember to consider how your actions or words might make others (employees, partners, suppliers, or clients) feel. Everyone comes from different backgrounds, and our perspectives may vary. What may seem like a harmless joke to one person could be offensive to another.

We must always foster an environment of mutual respect, support, and encouragement. We can promote these behaviors by keeping our values in mind, being transparent and honest, providing constructive feedback, and giving recognition where it is due.

We must also comply with, follow, and implement ADD's Protocol for the Prevention of Gender-Based Discrimination and for the Attention of Cases of Violence, Harassment, and Sexual Harassment.

**d) DEI.**

Our success is built on diversity and the unique backgrounds of each person. Recruitment, promotions, training, compensation, and benefits must be based solely on ability, professional experience, and adherence to ADD's values.

We must value differences and provide an inclusive work environment for all employees and stakeholders. We must comply with local laws and practices and never make employment decisions or discriminate based on characteristics protected by law, including:

- Age
- Race
- Ethnic origin
- Religion
- Gender
- Disability
- Marital status
- Sexual orientation

Working as "One ADD" means creating and maintaining a safe, inclusive, and productive work environment for everyone.

We must foster a culture of openness, courage, generosity, and respect that allows everyone at ADD to do their best and feel free to raise questions, ideas, and concerns. Everyone should always be treated with dignity and respect.

We must also comply with, follow, and implement ADD's Protocol for the Prevention of Gender-Based Discrimination and for the Attention of Cases of Violence, Harassment, and Sexual Harassment.



### **e) Environment.**

Our business must always be carried out in a sustainable and environmentally responsible manner. We are committed to mitigating the environmental and social impacts that our terminals and logistics operations may have on surrounding communities.

We achieve this by:

- Monitoring and controlling air emissions
- Managing land and conserving biodiversity within and around our sites
- Minimizing disturbances such as noise, vibration, or traffic
- Optimizing water use and reducing or recycling waste

Our environmental objectives are continuously monitored, reviewed, and updated. We provide the necessary resources to train and supervise employees and contractors on appropriate environmental management of our operations.

We must also be prepared to report potential environmental risks. All ADD sites are expected to implement our policies as a key mechanism for environmental impact assessment, stakeholder engagement, and incident response. Managers and administrative employees are responsible for clearly defining roles and responsibilities regarding environmental management, providing appropriate resources, and continuously measuring, reviewing, and improving ADD's environmental performance.

We work with governments and society to promote effective mechanisms that support environmental improvement, and we maintain open communication with our employees, suppliers, communities, and stakeholders to share our progress.

### **f) Conflicts of Interest.**

Even the appearance of a conflict of interest can jeopardize our personal and corporate reputation.

We must not enter into any agreements or conduct business that directly or indirectly competes with ADD. We must not use our position to gain improper opportunities or benefits, including gifts, loans, investments, outside jobs, or personal transactions.

We must not hire someone simply because they are a relative or friend of ours or of another ADD employee. However, the hiring of relatives or friends is permitted when they are the most qualified candidates and the proper hiring procedures are followed.

We may recommend relatives and friends in writing to the Human Resources Department but must immediately refrain from influencing or participating further in the process.

We must also be aware of potential conflicts of interest arising from supervisory relationships with relatives or friends. We must not allow favoritism; employees must be evaluated solely on talent and merit. We must not influence or participate in transfers, assignments, promotions, performance evaluations, or compensation decisions involving relatives or friends.

Particularly, we must avoid direct or indirect supervision (up to two levels apart) between family members or friends. We must remain alert when positions change, as promotions or transfers could create a conflict of interest where none previously existed.



To avoid conflicts, we cannot act as suppliers to our own company or hold ownership interests in any supplier. We must not participate or influence, directly or indirectly, in any quotation, negotiation, or decision-making process involving clients, suppliers, or advisors who are our relatives.

Additionally, we must notify ADD's Ethics and Conduct Committee, the Legal Department, and Human Resources if a company that is or intends to be an ADD client or supplier is owned by one of our relatives or friends.

At times, shareholders may also act as clients or suppliers of ADD. Such shareholders must be treated like any other stakeholder and subject to the same procedures and terms.

Members of ADD's Board of Directors and senior executives must disclose to the Legal and Internal Control departments any transaction or relationship that could reasonably be expected to give rise to a conflict of interest. The Board must be informed of such disclosures.

We must avoid even the appearance that we are not fully committed to the company's interests.

#### **g) Client Relationships.**

We work to be the best choice for our clients by carrying out all our activities in a fair, professional, and ethical manner.

We must never discriminate against clients or markets.

We encourage our clients to comply with our Code and the law. If we become aware that a client or business partner is engaging in illegal or unethical behavior, we must report it.

We must only commit to what we can actually deliver to our clients. If unforeseen circumstances make it impossible to fulfill a commitment, we must notify our immediate supervisor and, afterward, the client.

We must not make false statements about the quality or availability of our services, delivery dates, or payment terms. We must provide our services honestly and accurately, and we expect clients to act with the same level of integrity.

All business dealings with clients must be conducted respectfully, including observing local customs and traditions.

#### **h) Supplier Relationships.**

We must always manage our supplier relationships with honesty, respect, and integrity, offering equal opportunities to all, including equal chances to bid and win contracts. Our procurement process must be consistent, respectful, and confidential.

Our supplier selection criteria include:

- Competitive pricing
- Quality
- Experience
- Service
- Commitment to sustainable business practices



The incorporation of suppliers must follow established procedures. Relevant documentation must be provided and approved before establishing a commercial relationship. Payment terms and other contractual obligations must always comply with ADD's internal policies.

#### **i) Community Relations.**

Our ability to operate as a responsible company is fundamental to our business model. It allows us to create positive impacts that generate significant value for both ADD and society, while also considering the economic, social, and environmental contexts at national and international levels.

We aim to build a better future by understanding stakeholder expectations, managing ADD's impacts, and working with third parties and other stakeholders on initiatives that align with that vision.

When considering ADD's participation in economic, social, or environmental programs, we must always comply with the law, ensure that programs, actions, or sponsorships are approved by local authorities, and confirm that the management team responsible for approvals does so strictly in line with policy. We must ensure that ADD does not assume obligations or responsibilities that belong to governmental entities, other organizations, or the community itself.

We must also ensure that we do not create or promote any dependency on ADD. Our behavior within the community must always reflect ADD's values.

Participation in events not sponsored by ADD must not interfere with job performance. When participating in such events during personal or work time (with ADD's consent), we must never create false expectations of support or imply that ADD will contribute to the event or organization in any way.

As employees, we may not request or accept any personal assistance or benefits from public officials or private individuals in exchange for our support.

Furthermore, we aim to hire qualified local personnel and promote relationships with qualified local suppliers. All employment-related decisions must be based on ability, professional experience, and adherence to our corporate values.

#### **j) Government Relations.**

We conduct our business with respect and integrity in all our interactions with government agencies and officials worldwide.

Government entities may act as regulators, third parties, shareholders, or promoters. We must always conduct our business with these entities and officials in a manner consistent with ADD's values, our Code, our internal policies, and applicable law.

Before initiating any business contact with a governmental body or official, we must ensure that we have authorization to represent ADD and that we fully understand ADD's policies and all relevant laws and regulations.

If we are ever uncertain or have doubts about a commercial relationship with government entities or officials, we must seek prior guidance from the Legal Department.



#### **k) Gifts.**

Unless prohibited or restricted by local laws, we recognize that stakeholders — including suppliers, contractors, consultants, clients, and other third parties — may occasionally wish to exchange gifts or courtesies.

Offering or receiving gifts is not against our policy as long as the gift or courtesy is reasonable, serves a legitimate business purpose, and does not seek to exert improper influence on us or any third party.

We are not permitted to request, accept, or solicit any gift that could influence (or appear to influence) our ability to make objective decisions in the interest of ADD. We must never base or structure a business negotiation on a gift, service, or courtesy from a client, supplier, consultant, or other third party.

With the exception of legitimate, modest promotional items (not luxurious) and other courtesies consistent with standard business practices, we may not receive gifts or courtesies. While we can never accept cash or cash equivalents, we may occasionally accept courtesies if their cost, nature, and frequency are reasonable for business purposes.

Any employee receiving a gift, present, or courtesy must immediately inform their direct supervisor and copy General Management.

When offering gifts or courtesies, we must follow all ADD expense procedures, obtain all necessary approvals (including written authorization from our immediate supervisor), and ensure all expenses are properly recorded with clear and sufficient descriptions.

All gifts, meals, travel, and courtesies must comply with our Anti-Corruption Policy and must only be offered if permitted by both the recipient's policies and local laws. Any business courtesies offered to government bodies or officials must be legal, nominal in value, permitted under local law, and supported by legitimate business reasons. Additionally, all such gifts and courtesies must have prior written authorization from the President, General Director, and Director of Institutional Relations.

We must not request, negotiate, or accept gifts or courtesies from third parties for our own benefit or that of others unless such action is legal, ethical, and aligned with standard business practices between ADD and these third parties.

We may not request or accept donations for charitable or altruistic purposes from current or potential third parties unless ADD, in collaboration with other companies, decides to support specific campaigns.

#### **l) Anti-corruption.**

ADD strictly prohibits personnel from promising or giving anything of value to government officials or third parties to gain improper advantage or influence any decision. We also prohibit accepting or demanding anything of value that could influence our decision-making on behalf of ADD.



We must not offer anything to obtain permits or licenses, retain or secure business, gain any type of advantage, or attempt to improperly influence decisions especially those involving government officials.

We must also not hire third parties to act as representatives, intermediaries, or agents to perform such activities on our behalf. Before working with any third party, we must ensure they are reputable, agree to comply with this Code and ADD's policies, and sign a Compliance Declaration.

The Legal Department will assist in conducting due diligence and documenting relationships with third parties in accordance with applicable policies.

Because anti-corruption and anti-bribery laws can be complex, if you are unsure about any matter or incident, you must ask questions or raise concerns with the Legal Department.

**m) Money Laundering.**

We must recognize the warning signs of money laundering and ensure we do not facilitate or support the concealment of illicit funds obtained from criminal or terrorist activities through our legitimate business operations.

Money laundering is the process of disguising the nature and source of money or assets connected with criminal activities — such as drug trafficking, terrorism, bribery, or corruption by integrating illicit funds into legitimate commerce to make them appear lawful or untraceable.

Individuals involved in criminal activities attempt to conceal or legitimize the proceeds of their crimes by “laundering” them through legitimate businesses.

If you have any concerns regarding payments, transactions, or business dealings with any party that refuses to provide transaction details or identification, or if you suspect involvement in money laundering, you must immediately report your concerns to the Legal Department or Internal Control.

**n) Compliance with International Trade.**

As an international company, ADD provides its services globally and must comply with economic competition laws, sanctions, and trade controls wherever we operate. Before participating in any import or export transaction, we must consult the Legal Department and the Procurement Department.

We must stay informed about any trade sanctions that may apply to our business, as these matters are complex and frequently change. We must also be aware of and avoid illegal boycott requests. Under certain international laws, we are prohibited from cooperating with or supporting any boycott or restrictive trade practice. This means we cannot take actions, provide information, or make statements that could be seen as participation in a foreign illegal boycott.

**o) Regulatory Compliance.**

We operate internationally and are subject to numerous laws and regulations. We also frequently interact with government representatives during our operations.



We must always deal honestly and cooperatively with government representatives and treat them with respect.

When a government representative requests information or documents in ADD's possession, such requests must be coordinated with the Legal Department and the Institutional Relations Department.

Supervisors must ensure they are familiar with the laws and regulations that govern their business unit and be prepared to handle potential compliance risks.

**p) Data Privacy and Information Protection.**

ADD is committed to complying with national and international data protection laws to safeguard the personal information of third parties. Proper and lawful handling of personal information fosters trust in the organization and supports successful business operations.

Protecting the confidentiality and integrity of personal data is a critical responsibility that builds the foundation for trustworthy business relationships.

While many internal business processes require the collection or processing of personal data, we must recognize that privacy laws require ADD to be transparent about the legal basis for processing such data.

We must therefore process personal data fairly and lawfully, providing access within our organization only when strictly necessary.

ADD personnel who regularly handle personal data are granted access only when essential. Whenever ADD needs to share personal data with third parties for contractual purposes, we ensure those parties comply with the same strict confidentiality standards that we do.

We must also have procedures to handle incidents where personal data may be at risk due to unauthorized access, disclosure, or loss, and relevant ADD staff must be properly trained in these procedures.

Although we continuously seek improvement and use information to remain competitive, we must always protect all company data and resources from unauthorized disclosure.

Examples of information we must protect include:

- Accounting information
- Investments and investment plans
- Mergers and acquisitions information
- Operational or commercial policies and practices
- Organizational changes
- Industrial and trade secrets
- Trademarks and copyrights
- Client and supplier data



- Employee salaries and benefits
- Technical product plans and information
- Financial forecasts and strategies
- Financing and securities transactions
- Legal and administrative disputes
- Research and development of new products
- Patents
- Cost and pricing data
- Employee medical information
- Bidding information and technical specification.

**q) Confidentiality.**

During the execution of their work, programs, methods, and projects, employees must not disclose to third parties any information or documentation related to their duties.

If an employee is required by a competent judicial or administrative authority to disclose any intellectual property, information, or documentation, they must first notify the President, General Management, Legal, or Human Resources Department before disclosing anything.

Employees and drivers whose employment relationship ends for any reason are still obligated not to disclose, in any form, any information or documentation they had access to during their time with the company.

ADD reserves the right to determine whether any of its employees must sign a specific confidentiality agreement, bond, or other instrument, regardless of the provisions in this Code.

**r) Use of ADD Assets.**

We must not use ADD assets for personal benefit and must ensure that company assets are not stolen, damaged, or misused by anyone.

We are responsible for maintaining a clean and organized work environment and for ensuring operational safety at all times.

Limited personal use of tools such as computers, email, phones, or the internet may be acceptable, provided it is reasonable, does not incur excessive costs, and does not interfere with work responsibilities.

When using company devices, it is strictly prohibited to create, view, store, request, or distribute any material that is offensive, illegal, or inappropriate in nature — including material that is intimidating, threatening, abusive, discriminatory, or sexually explicit.

ADD assets may include, but are not limited to:

1. Buildings and facilities
2. Vehicles
3. Equipment and tools
4. Materials and inventory
5. Client information



6. Intellectual property
7. Office, communication, and computer equipment
8. Corporate plans and strategies
9. Software and digital platforms
10. Employee, client, and supplier information
11. Business and corporate records
12. Stationery and other office supplies