



CODE OF CONDUCT

GLOSSARY

Code of Conduct or Code of Opex Perforadora SA de CV:	This Code of Conduct.
Company or Group Opex Perforadora SA de CV:	Refers to the corporate group formed by the company Opex Perforadora, SA de CV, and all its companies, affiliates, subsidiaries, holding companies and/or subsidiaries.
Contributor(s):	Means any worker, service provider, administrator, manager, partner, associate, shareholder, counselor, attorney-in-fact or legal representative of the Company.
Director(s):	Means the General Director, Financial Director, Sales Director, Purchasing Director, Operations Director, Human Resources Director, Legal Director, Information Technology Director, Supply Chain Director, as well as any other Collaborator who has any position , commission, function, appointment or managerial position within the Company.
Department Legal:	The Company's Legal Department.
Computer equipment:	Any physical, computer, electronic, digital or computer equipment, tool, mechanism, means or device provided by the Company to its Collaborators for the performance of their activities, for example: desktop computer, laptop (portable computer), telephone, iPad , tablet (tablet), smartphone (smartphone), cell phone, computer, digital versatile disc (DVD), compact disc (CD), hard drive, portable memory, USB, internal or external memory, modem, router (router), energy regulator, camera, headphones, keyboard, speaker, mouse (mouse), printer, scanner, email account, password, key, password, user, means of access, licenses, programs, permits, among others.
FCPA:	Foreign Corrupt Practices Act (FCPA) passed by the United States Congress in 1977.
Information:	Any type of information, secrets, plans, contents, files, documents, data, records, reports, audits, records, emails, images, photographs, videos, audios, sounds, passwords, keys, passwords, means of access, users, messages, communications, calls, chats, conversations, applications, systems, programs, software, licences, lists, databases, names, telephone numbers and addresses, whether in physical, digital, electronic or any other type.
Mexico:	The United Mexican States.
Internal Rules of Opex Perforadora, SA de CV :	Internal rules of OPEX Perforadora, SA de CV: they cover all types of codes (including this Code of Conduct), policies, regulations, guidelines, guides, directives, instructions, indications, processes, directives, rules, notices, contracts, clauses, indications , instructions, contracts, recommendations and/or notices issued by the Company.

ILO:

International Labor Organization.

Public servers):

- ✓ Any official, commissioner, servant or public employee, who renders his services in the federal, state, local municipal public administration, whether inside or outside of Mexico, as well as in any agency, dependency, organ or government agency or parastatal.
- ✓ Any official, commissioner, servant or public employee, who provides his services in the federal, state, municipal or local courts, tribunals and Judicial Powers, inside and outside of Mexico.
- ✓ Any official, commissioner, servant or public employee, who provides his services in the parliaments and federal, state, municipal or local Legislative Powers, inside and outside of Mexico. A political party, national or foreign, or an active member of it.
- ✓ Any candidate to hold a position, commission, function or public position, inside and outside of Mexico.
- ✓ Any person who exercises jurisdictional or judicial activities within the various instances and courts of the federal, state, municipal or local Judiciary, inside and outside the national territory.
- ✓ Any person who has the power to influence, create or modify laws from the federal, state, municipal or local parliamentary instances, inside and outside of Mexico.
- ✓ Any international or intergovernmental organization, court or public agency that carries out regulatory, judicial or investigative activities, for example: the International Monetary Fund (IMF), the United Nations Organization (UN), International Organization (ILO), World Trade Organization (WTO), Organization of American States (OAS), Organization for Economic Cooperation and Development (OECD), World Bank (WB), Inter-American Court of Human Rights (Court IDH), Financial Action Task Force (GAFI), International Criminal Police Organization (INTERPOL), among others.
- ✓ The senators and deputies of the Congress of the Union, the ministers of the Supreme Court of Justice of the Nation, the advisers of the Federal Judiciary, the secretaries of Office, the Attorney General of the Republic, the circuit magistrates and district judges, the President counselor, the electoral councilors and the executive secretary of the National Electoral Institute, the magistrates of the Electoral Tribunal, the members of the autonomous constitutional bodies, the general directors and their equivalents of the decentralized organizations, companies with majority state participation, companies and associations assimilated to these and public trusts, the executives of the federative entities, local Deputies, Magistrates of the Local Superior Courts of Justice, the members of the Councils of the Local Judiciary, as well as the members of the organisms to which they Local Constitutions grant them autonomy (all of these, from Mexico and, if they exist, their counterparts abroad).



DECLARATION OF ACCEPTANCE

The OPEX Code of Conduct is an instrument created by OPEX Perforadora, SA de CV ("OPEX"), with the purpose that its Collaborators have a tool that serves to guide their work, providing them with a focus on service, ethics and legality in the performance of their functions.

With this in mind, this Code of Conduct was drafted that you now have in your hands and that you must read, understand, implement, comply with, respect and make it yours, in such a way that you always take into account the duties inherent to your assignment and the enormous responsibility that with it takes to assume them.



INDEX

GLOSSARY	1
DECLARATION OF ACCEPTANCE	3
RECIPIENTS OF THE OPEX CODE OF CONDUCT.....	5
OBJECTIVE OF THE OPEX CODE OF CONDUCT	5
OPEX VALUES AND PRINCIPLES	5
PROFESSIONALISM	6
COMMUNICATION	6
ADDITION OF TALENT AND KNOWLEDGE MANAGEMENT	6
INSTITUTIONAL LOYALTY	7
COMPLY WITH INTERNAL OPEX REGULATIONS AND THE LAWS	7
RESPECT HUMAN RIGHTS	8
THE VALUE OF OUR EMPLOYEES.....	9
THE VALUE OF OUR SUPPLIERS	10
NO TO DISCRIMINATION	10
NO TO VIOLENCE	11
NO TO HARASSMENT	11
NO TO FRAUD	11
NO TO THEFT	12
NO TO CORRUPTION	12
NO TO CONFLICT OF INTERESTS	16
NO TO ALCOHOL AND DRUGS.....	17
NO TO WEAPONS	18
TRANSPARENCY IN ACCOUNTING AND FINANCES.....	18
REGISTRY, TRANSPARENCY AND CONTROL IN OUR ACTIVITIES.....	19
COLLABORATE WITH THE AUTHORITIES	20
TAKE CARE OF OUR WORK TOOLS	20
PROTECT THE CONFIDENTIALITY OF INFORMATION	20
DUE PROTECTION OF THE INFORMATION	21
COMPUTER EQUIPMENT AND INTERNET USE	22
PRUDENCE, SAFETY AND HYGIENE AT WORK.....	23
SOCIAL RESPONSIBILITY: OUR SHARED VALUE MODEL	25
SUSTAINABLE DEVELOPMENT AND PROTECTION OF THE ENVIRONMENT	25
INTERNATIONAL TRADE RULES	26
FAIR COMPETITION	26
WE MUST PREVENT CRIMES.....	26
WE ACT CONGRUENTLY	27
THE VALUE OF EVALUATION	27
DON'T SHUT UP: INTERNAL COMPLAINTS CHANNEL	27
BREACH OF THE CODE OF CONDUCT	28
COMMENTS, DOUBTS, COMPLAINTS AND SUGGESTIONS	29



RECIPIENTS OF THE OPEX CODE OF CONDUCT

This Code of Conduct is addressed to all Company Collaborators.

PURPOSE OF THE OPEX CODE OF CONDUCT

- ✓ Reiterate and make our Collaborators aware of the fundamental values and business principles of OPEX
- ✓ Provide the general frame of reference for our actions as OPEX Collaborators.
- ✓ Protect, strengthen and foster the trust that customers, Collaborators, suppliers, authorities and the general public have placed in the Company due to our adherence to legality, professionalism and ethics in the provision of our services.
- ✓ Generate an additional line of communication between the Company and its Collaborators, so that they timely report suspected violations of this Code, OPEX's internal regulations or current laws related to the services provided by the Company.

OPEX VALUES AND PRINCIPLES

The fundamental values, although not the only ones, that distinguish the Company and represent the basis that governs its activities and our actions as Collaborators, are:

SECURITY PROFITABILITY TRANSPARENCY
SERVICE ETHICS INTEGRITY RESPECT
HONESTY QUALITY COMPETITIVENESS
RESPONSIBILITY LEGALITY

Likewise, Collaborators must respect the following principles:

- ✓ Our activities as OPEX Collaborators must be carried out seeking maximum efficiency, professionalism and customer satisfaction.
- ✓ Avoid carrying out conduct that may put the Company, other Collaborators or any third party at risk or harm.
- ✓ Comply with the provisions of this Code of Conduct, OPEX's internal regulations and current laws.
- ✓ Refrain from activities that are not directly related to your position or responsibilities.



PROFESSIONALISM



It is the obligation of the Company and its Collaborators to always keep us informed of technical, operational, scientific, technological and legal advances and changes that arise in the various fields in which we work. In addition, it is the obligation of both of us to try by all possible means to improve the quality of our services, both technically and humanly.

This is important in order to reduce the level of occupational, legal and accident risks.

COMMUNICATION



At OPEX we know that the basis of trust and organizational unity is sincerity. For this reason, we must all **conduct ourselves truthfully** in our relations with other Collaborators and in all the communications we make as a result of our activities in the Company.

ADDITION OF TALENTS AND KNOWLEDGE MANAGEMENT



The talents are distributed differently, so no one has the (unique) answer in their pocket; The answers that we have to give to the problems that we face on a day-to-day basis are built by all of us, each one putting the part of knowledge that complements the limitation of the others and trying to incorporate the knowledge of the others into their own experience.

Humility does not consist in not knowing, but in assuming the reality of our limitations and at the same time recognizing our talents.



INSTITUTIONAL LOYALTY

In order to respond to the problems that arise at work, we must maintain at all times the "**esprit de corps**", which leads us to feel proud of the Company of which we are a part, always being ready to defend it and put it first. influence particular interests when we carry out our work. We know how to maintain the due secrecy of those things that concern work and are entrusted to us in a confidential manner. Likewise, we warn our superiors and Directors of the risks that arise for the good name and integrity of OPEX in the various fields in which it operates or in which its performance impacts.

The principle of institutional loyalty would be violated if activities are carried out that are in conflict with the interests of the Company or even that generate a perception of conflict of interest.

COMPLY WITH INTERNAL RULES OF OPEX AND THE LAWS

The Collaborators and the Company are governed by OPEX's internal regulations, as well as by various federal, state, municipal and local laws, both inside and outside of Mexico, for this reason, we must know, understand and respect them . If you have doubts about OPEX's internal regulations or the laws that govern us, you should always go to the Company's Legal Department as soon as possible to clarify your questions.

RESPECT HUMAN RIGHTS

At OPEX we know and recognize that the dignity of the person is the foundation of their human rights. For this reason, we promote respect for each of our Collaborators and we promote in all our activities that their rights take precedence over any other personal or collective interest.

The activities carried out by Collaborators and the Company must be carried out with full respect for people and their **human rights**, which are those recognized to all people for the mere fact of being such, for example, the right to life, dignity, health, equality, privacy, heritage, security, education, work and freedom (which includes both freedom of movement and freedom of expression, decision, thought, religion, etc.).

Likewise, at OPEX we are committed to promoting the principles of respect and promotion of human rights, in accordance with the provisions of the PACT UNITED NATIONS WORLD COMPACT (UN Global Compact) in the terms indicated below:

OPEX must support and respect, within its sphere of influence, the protection of internationally recognized fundamental human rights, both for its Collaborators and for people who are somehow related to our products and services, be it as suppliers, franchisees, business partners or customers.

OPEX will ensure at all times that its companies are not complicit in acts that violate human rights, which will be the reason for permanent surveillance of the Directors in their respective work areas.

OPEX must support the freedom of association and the effective recognition of the right to collective bargaining for its workers, in accordance with the provisions of applicable laws and the ILO.

OPEX must support the elimination of all forms of forced or coerced labor.

OPEX will not hire minors under any circumstances and is committed to supporting the eradication of child labor in companies, as well as the work of undocumented migrants.

OPEX is committed to adopting a labor policy of tolerance and non-discrimination. In addition, we make our commitment to support campaigns to abolish discrimination practices in employment and occupation.

OPEX must maintain a preventive approach that favors the environment, as well as flora and fauna, and undertakes to seek to disseminate this purpose as one of its philanthropic and social responsibility activities.

OPEX will favor the development and diffusion of environmentally friendly technologies.

OPEX will work against corruption in all its forms, including extortion and bribery that directly affect people in precarious or vulnerable situations.

THE VALUE OF OUR EMPLOYEES



Our Collaborators are not "resources" of "labor" or spare parts on an "assembly line", but human beings with dignity who contribute their talent, experience and knowledge to our Company. For this reason, it is considered a fundamental part of the **HUMAN CAPITAL STRATEGY**, which we wish to strengthen, retain and promote so that it grows professionally, knowing that the improvement in the quality of our products and services depends on its growth and, finally, , of productivity that benefits everyone.

As a consequence of the value we make of knowledge management and talent recognition, we adopt the metaphor of the **employee as an investor**, since we know that their work does not constitute a sale of labor, but rather an essential contribution to development, growth and prestige of the Company. For this reason, we are especially interested in training, since in addition to contributing to the optimal performance of the functions that each one performs within the Company, it favors the growth and personal development of its human capital.

In correspondence with the recognition that is made of the value of work, all Collaborators commit to **comply with the goals set in terms of training**, attending and obtaining the certificate and knowledge corresponding to the courses, programs, diplomas and other events of a formative nature. that are organized by OPEX.

OPEX undertakes to respect the provisions of the ILO Declaration on **fundamental principles and rights at work, labor freedom and respect for people**, taking into account their particular needs and their own circumstances. From this perspective, the selection, promotion, compensation and bonus processes are intended to achieve a constant incentive and professional and personal development for our Collaborators, therefore, said processes are carried out on an equal opportunity basis, taking into consideration objective criteria of productivity, professionalism and efficiency.

THE VALUE OF OUR SUPPLIERS



The satisfaction of our customers is largely due to the quality of services and products that the Company receives from its suppliers.

The selection of our suppliers is based on equal opportunities and objective criteria, such as: price, quality, experience, their culture of respect for the law, among others. The contracting of suppliers under subjective, impartial, discriminatory, illegal criteria or contrary to what is established in the OPEX internal regulations is prohibited.

NO TO DISCRIMINATION



We believe that diversity constitutes the strength of our Company, therefore, all types of discrimination based on ethnic or national origin, gender, age, disabilities, social status, health conditions, religion, opinions, sexual preferences, marital status or any other circumstance, characteristic, situation, fact or aspect that violates human dignity or their rights or freedoms.

Likewise, any offensive, rude or denigrating comment, mockery or joke is prohibited for any of the reasons indicated in the previous paragraph. To make this respect for diversity a reality in daily life, it is necessary to use courteous and inclusive language, and treat people with kindness and attention, respecting their privacy at all times and always seeking their well-being.

NO TO VIOLENCE



We strive for a work climate based on mutual respect in the Company, for which the use of any type of violence, intimidation, retaliation, revenge, attack, threat, aggression, blackmail, pressure, extortion, coercion or coercion, as well as harass, harass, harass, abuse, damage, harass, annoy, annoy or mock any Collaborator or third party related to the Company. .

NO TO HARASSMENT



Any insinuation, intimidation, solicitation, assault, proposal, conduct, mockery, joke, act or comment of a sexual nature that is undesirable or unsolicited by the recipient is prohibited.

Do not insinuate, demand, suggest or request favours, benefits, behaviors or acts of a sexual nature or of any other type, taking advantage of the position, commission, power, responsibilities, faculties or authority that your position as a Collaborator within the Company may give you. .



NO TO FRAUD



At the Company we believe in the honesty of our Collaborators as well as in the value of the trust that they place, for which reason, at OPEX we believe that fraud is not only deceiving or taking advantage of the error or wrong perception that another person finds in order to obtain an improper profit or benefit; it will also be any dishonest, undue, incorrect, irregular, disloyal, illegal, illicit, unprofessional and/or advantageous conduct committed by the Collaborator and that may cause harm to the Company, other Collaborators or any third party related to the Company, since said behaviors are an objective reason to lose the trust that OPEX places in its Collaborators.

Therefore, we reiterate that it is prohibited to plan, direct, carry out, incite, collaborate, attempt, hide or cover up conduct that is or may be fraudulent.

NO TO THEFT



We must respect what is not ours, therefore, at OPEX it is forbidden to steal, take, hide or appropriate money or things, whether intangible or tangible, that do not belong to you. nezan.

Therefore, we reiterate that it is prohibited to plan, direct, carry out, incite, collaborate, attempt, hide or cover up conduct that is or may constitute theft.

NO TO CORRUPTION

- **ZERO TOLERANCE**

In compliance with the anti-bribery and anti-corruption laws of Mexico and the United States of America, and in accordance with the provisions on these matters in the other countries where the Company operates, we make our commitment to prevent and combat corruption within our Company with a policy of zero tolerance, for which any activity that tends to promote, offer, give, carry out or conceal bribes to public servants with the purpose of obtaining contracts, privileged information or any other benefit that places OPEX in an advantageous situation with respect to our competitors or for the Company to receive any preferential treatment.

- **APPLICATION OF ANTI-CORRUPTION REGULATIONS**

The Company undertakes to comply with the provisions in this matter, both in the GENERAL LAW OF THE NATIONAL ANTICORRUPTION SYSTEM, as well as in the Federal Criminal Code, the National Code of Criminal Procedures of Mexico, the FCPA, as well as other laws that both within and outside of Mexico must be complied with by our Company to prevent corrupt practices and bribery.

Any violation of these laws may result in administrative, civil and criminal liability for the offending Collaborator and for the Company, whether inside or outside of Mexico. Even though the FCPA is not a Mexican law, it is applicable to our Company considering the nature of its operations and the need for reciprocity with international companies. Therefore, it is mandatory for OPEX and its Collaborators. Under the FCPA, for example, offering bribes, giving gifts, or doing favors of any value to a public official (or to third-party intermediaries who may transfer the bribe or gift) in order to obtain favorable business treatment for the Company, constitutes an illegal act.



OPEX endorses the principles that inform the most important UN document on anti-corruption, that is, the UNITED NATIONS CONVENTION AGAINST CORRUPTION, especially in those aspects in which the public and private sectors come together as actors and promoters of the fight against corruption.

• PROHIBITION

In accordance with the provisions of said regulations, we declare that it is strictly prohibited in our Company to carry out any acts that tend to influence the decision of public servants, as well as to carry out bribes indirectly, through a third party or an intermediary, such as be a franchisee, consultant, distributor, supplier or contractor or a partner in a joint venture.

It is prohibited to direct, organize, incite, instigate, induce, participate, collaborate, help, cooperate, try, hide, hide, tolerate, cover up, execute or perform conduct that is or may be acts of corruption or that tend to influence the decision of public servants to unduly favor the Company.

Some examples of behaviors that can be considered as acts of corruption:

	<ul style="list-style-type: none">• Request, accept, offer or make bribes to public servants.
	<ul style="list-style-type: none">• Request, accept, offer or make facilitation payments, which are those made to public servants to illegally or improperly avoid or expedite procedures.
	<ul style="list-style-type: none">• Making facilitation or bribe payments directly to public officials or indirectly, through a third party or intermediary, such as a franchisee, consultant, distributor, supplier or contractor, or a joint venture partner.
	<ul style="list-style-type: none">• Offer or promise public servants any favor, gift, money or benefit in exchange for obtaining an advantage, profit or improper benefit for the Company.
	<ul style="list-style-type: none">• Allow, tolerate, hide or cover up any of the behaviors indicated in the preceding paragraphs.
	

- **REASONABLE EXPENSES**

Reasonable and legitimate expenses made by the Company to cover travel, food or lodging for public servants when necessary for the demonstration of products and services or for visits to facilities will not be held for acts of bribery or corruption.

- **GIFTS**

Receiving and giving gifts is part of social life, but it is unacceptable to give monetary gifts or benefits that are intended to influence public servants to obtain illegitimate advantages in favor of the Company. Any gift that is given must be made openly and in compliance with the FCPA, applicable laws and OPEX's internal regulations, and in no case may the gift or benefit be given if it can be perceived as a form of bribery that contributes to influence the public servant on decisions that will be made related to the Company.

- **PRIOR RESEARCH**

It is the obligation of all Directors and Collaborators, within the scope of their powers and tasks, to carry out a prior investigation of the background and trajectory of the organizations or persons with whom the Company signs contracts or intends to establish a commercial relationship. To do this, you must use the 'Guidelines for the review of potential suppliers or franchisees' that OPEX has.

- **PROHIBITION OF RECRUITMENT**

Consistent with the principles and values that it has upheld since its foundation, OPEX prohibits its Collaborators from contracting with third parties when, based on the information obtained from the aforementioned legitimate prior investigation process or, for any other legitimate reason, they are aware that those third parties have resorted to illegal or corrupt means to obtain any bid, contract or benefit.

It is enough that there is only a reasonable suspicion to suspend any negotiation, exchange or commercial relationship with those companies or persons. Indicative and non-limiting examples of these reasonable suspicions are the following:

- ✔ If the third party (possible contractor) is recommended by a public servant related to the matter of the possible contract between the Company and the third party.
- ✔ That there is any family, affective or professional relationship between the third party and a public servant related to the subject matter of the possible contract between the third party and the Company.
- ✔ When the third party proposes or insinuates that the business be closed "with a handshake", that is, without a written contract or intends not to comply with formal elements of public contracting.
- ✔ When the third party refuses to include anti-bribery and anti-corruption clauses in the possible contract with the Company.
- ✔ When the third party applies a rate, fee or commission that is excessive or unreasonable compared to the average market rates.
- ✔ When it is known that the third party with whom the possible contract is being negotiated has low standards in terms of regulatory compliance, anti-corruption or corporate ethics.

- **PRIOR INFORMATION ABOUT DONATIONS**

In order to detect possible bribes or acts of corruption disguised as alleged philanthropic donations or sponsorships, Collaborators in charge of legally carrying out or formalizing contracts with potential clients and suppliers must previously comply with the following precautionary measures, which are established without limitation and not limiting, and may vary from case to case:

Request the third party (possible contractor) its policies for the proper handling of donations, sponsorships and philanthropic contributions that it makes.

Verify that donations, philanthropic contributions and third party sponsorships are made at the right time, preventing them from being made when tenders, contests, or contracting or negotiation processes with public servants are in progress.

Define clear Company policies regarding philanthropic contributions, donations and sponsorships, and require third parties to do the same.

Evaluate Collaborators and third parties regarding their relationship with philanthropic organizations or people who will benefit from possible donations or sponsorships made by the third party or by our own Company, to identify possible conflicts of interest or simulated practices of favoritism, bribery or corruption.

OPEX undertakes to disclose, through its website, the philanthropic contributions, donations and sponsorships that it makes (unless confidentiality is required by law) and will request the same from third parties with which it establishes commercial relations. In any case, it is the policy of this Company that all donations, sponsorships or philanthropic contributions have the prior approval of the General Director or persons to whom that power is delegated.

NO TO CONFLICT OF INTEREST



A conflict of interest exists when an interest of the Collaborator (whether personal, economic, family, labor or of any kind) affects or could affect the proper performance of their activities in RASC.

Example: that a Collaborator in charge of contracting suppliers is the father of one of the suppliers who intend to provide services to the Company. In this case, there would be a conflict of interest, since due to the family relationship with his son, the Collaborator may not perform his duties impartially and objectively, since he would be inclined to hire his son, even when he does not present the best commercial hiring conditions. compared to the other providers.

Conflicts of interest can take many forms, not all of which can be specifically mentioned. The following are just a few examples of conflicts of interest that can and should be avoided:

- ✔ Performing an activity that conflicts with Company business.
- ✔ Having a shareholding or other type of business relationship with a competitor, supplier or distributor of the Company and not making it known to the OPEX Directors.
- ✔ Carrying out Company business with or on behalf of a family member of the Collaborator, including business with any OPEX supplier or distributor, without the prior consent of the Company.
- ✔ Being a collaborator, official, director, worker, consultant, administrator, partner, shareholder, proxy or legal representative of a competitor, supplier or distributor of OPEX, without the written approval of the Company.
- ✔ Any Employee of the Company who is in a position to give or receive a gift out of habit or to entertain or be entertained by business associates, assumes the responsibility of ensuring that their actions comply with our policies regarding conflicts of interest.
- ✔ In general, any situation in which our Collaborators are influenced or even, when they appear to be influenced, by considerations that benefit them personally or a third party with whom they have some link or interest, generating a conflict with their obligations and responsibilities towards the company.

If a conflict of interest arises in which you are or may be related, even if you consider that it will not affect the proper performance of your duties, you must immediately notify the Legal Department or your superior, so that the Company can make the necessary decisions to address the matter. situation.

Collaborators with Management positions within OPEX who wish to participate in the board of a non-profit organization or intend to provide services as a consultant or employee of a third party, must first consult with the Legal Department or the General Director and obtain their approval.

NO TO ALCOHOL AND DRUGS



Within the vessels, facilities and work areas of the Company or those operated by OPEX or with respect to which it has a business relationship, it is strictly prohibited to promote, use, sell, possess, distribute, consume, produce, introduce, transport or transfer any type of illegal drug, intoxicating substance or drink, narcotics, psychotropics, opioids, narcotics, hallucinogens, sleeping pills, drugs or controlled medicines purchased without a prescription.

Collaborators may not appear to carry out their activities under the influence or effects of any of the aforementioned substances, doing so may be a justified cause for the termination of their employment relationship or provision of services with the Company.

If due to any health condition, you must take any controlled substance or medication, you must immediately notify your superior, so that he or she can consult with medical specialists, if necessary, and determine if the Collaborator is fit to carry out their activities.

OPEX is committed to a safe, healthy, and productive work environment for everyone, therefore, the Company, consistent with its legal duty to avoid, as far as possible, work accidents or situations that may put other Collaborators at risk. or third parties due to the activities we carry out, the Company at any time may request its Collaborators to perform medical or chemical analysis and tests on alcohol and/or drug use, as well as carry out random searches on OPEX vessels and facilities. of alcohol and/or drugs.

The tests on alcohol and/or drug use of Collaborators are voluntary, however, not agreeing to perform them may generate a well-founded presumption that said Collaborator does not adhere to this Code of Conduct and, consequently, a Loss of trust, which may also be a justified and legitimate cause to terminate the employment relationship or the provision of services between the Company and the Collaborator.

NO TO WEAPONS



The possession or use of firearms or other weapons is not allowed within OPEX facilities and work areas, unless, in accordance with what is permitted by law, it is considered necessary and, where appropriate, there is the required licenses.

TRANSPARENCY IN ACCOUNTING AND FINANCES



Part of the efforts that the Company has made, since its origins, in order to prevent, detect and mitigate illegal acts, is in its strict accounting procedures, for which, the Collaborators responsible for or related to banking, financial, The Company's accounting, fiscal, or auditing officers must ensure that all documents, information, books, and records of said operations are true, up-to-date, and always adhere to the provisions of applicable laws and regulations, internal OPEX standards, as well as as provided in the FCPA.

Any payment, including travel expenses, reimbursement of expenses and legal contributions and taxes, must be adequately documented and recorded in the corresponding books or files of the Company by the Collaborators responsible for the realization, documentation, administration, management and/or approval of such payments.

To maintain the provisions of the two previous items, Collaborators may not, for any reason, generate false invoices, nor make unusual or excessive payments or to anonymous accounts, or whose justifications or concepts are described in an inadequate, imprecise, false, misleading, incomplete or unclear.

At OPEX we comply with the provisions on transparency and information established by the **FINANCIAL INFORMATION STANDARDS (NIF)**. Therefore, any payment, receipt, transaction and other banking, financial, accounting and tax operations must be recorded in a truthful, precise, adequate and timely manner in accordance with said NIF, for which the use of invoices, reports is strictly prohibited. False, incomplete, or misleading financial, accounting, and tax documents, audits, entries, statements, information, or documents, as well as signing or disseminating documents that are known or believed to be inaccurate, false, or misleading.

Likewise, in accordance with the provisions of the various regulatory documents of the SECURITIES AND EXCHANGE COMMISSION (SEC) of the United States of America, all financial activities carried out in OPEX must also observe the accounting, financial and audit transparency requirements. management in order to improve corporate governance control and increase the reliability of our Company and the confidence of investors.



REGISTRATION, TRANSPARENCY AND CONTROL IN OUR ACTIVITIES



Each of the Collaborators plays a role in ensuring that their activities and information related to their functions are properly, opportunely and truthfully registered, documented and protected, since the above will allow us all to have better control over what we make.

Likewise, it is necessary that the reports that we render to the various areas that request them are truthful, acknowledging when necessary, if we made an error or a fault for whatever reason in order to correct it and not harm the Company and those related to it. or depend on it.

COOPERATE WITH THE AUTHORITIES



At OPEX we believe in the value, respect and dissemination of the culture of legality, which undoubtedly implies that both the Company and its Collaborators must cooperate in a timely manner with the authorities, national or foreign, and respect their powers of investigation and supervision, for example, during tax or labor audits, security inspections, legal processes or trials, among others.

In the event that Collaborator receives an inspection, audit, requirement, official letter, communication or summons at work or at home, related to Company matters, you must immediately notify the Legal Department.

Both the law and this Code of Conduct prohibit false or misleading statements in a lawsuit, complaint, investigation, audit, interview, statement, inspection, request, or submission of documentation or information to authorities.



TAKE CARE OF OUR WORK TOOLS



You must make correct, diligent and efficient use of the elements, tools, instruments, equipment, inputs, funds, resources, services, money, goods, products or materials provided by the Company to carry out your activities, as well as our facilities and work areas.

PROTECT THE CONFIDENTIALITY OF INFORMATION



Due to your activities as a Company Collaborator, you have knowledge or access to many types of information, which is confidential **and is the total and exclusive property of OPEX.**

It is necessary for the Company's Collaborators to act responsibly and legally in order to protect the privacy of the Company and others, especially with respect to information that may constitute a **trade secret or copyright, or is of a confidential, reserved, private, personal, sensitive and/or privileged.** We remind you that you must act with great diligence to avoid accidental disclosure of information, for example, during social conversations with friends and family or when using documents in public spaces.

As a Collaborator, you may use the information that you know within OPEX, as long as it is necessary, is directly related to your activities in the Company and you respect the framework of the laws that protect the confidentiality of information, otherwise, it is totally prohibited to reveal, publish, disseminate, divulge, share, lend, reproduce, copy, extract, obtain, subtract, take, appropriate and/or make improper, illicit or non-professional use of said information. Responsibility in the protection of information is an applicable obligation even after the end of your relationship as an OPEX Collaborator.

The Company's information will be accessible only to the people who need to know it, therefore, it will not be available to any Collaborator; If you have any doubts about giving access to a third party (even if it is a Manager or Collaborator with management or command positions), you should immediately consult the Legal Department whether or not access is appropriate.

DUE PROTECTION OF INFORMATION

Each of the Collaborators is responsible for the proper storage, safekeeping and protection of the information that they know within OPEX.



Eventually, the Company establishes policies or guidelines for the destruction of information in order to guarantee legal compliance. Collaborators must keep themselves informed of these policies or guidelines and respect what they have. In the event that there is any reasonably foreseeable risk that a legal claim, criminal complaint, audit, administrative proceeding or other investigation may be initiated, the Legal Department must be consulted prior to the destruction of the information.

COMPUTER EQUIPMENT AND INTERNET USE



Any computer equipment, as well as all the information contained in said equipment is the total and exclusive property of the Company.

Since the computer equipment is owned by the Company and only two are provided as work tools, the Collaborator understands, acknowledges and accepts that OPEX has the legitimate power to access them to, among other actions: obtain and use information, evaluate the performance and productivity of the Collaborator, investigate possible violations of this Code of Conduct, the laws or OPEX's internal regulations, and especially, prevent, detect and mitigate irregular, illegal, criminal or illegal behaviors that could be related to or carried out through of computer equipment.

Due to the foregoing, OPEX, directly or through the persons it designates, without any restriction or notification, may access the computer equipment and the information it contains, in order to extract, analyze, transfer and/or use it. OPEX is distinguished by its commitment to respecting the law, so any of the aforementioned activities will be carried out in accordance with the laws in force regarding the security and confidentiality of information and personal data, as well as in terms of preservation and protection of evidence, consistent with due control, supervision and organizational surveillance.

The Company's computer equipment and Internet networks may be used for personal matters, as long as it does not imply a decrease in the quality, productivity and volume of the activities that the Collaborator carries out in the Company, and that such use is not contrary to this Code of Conduct, OPEX's internal rules or the law.

Considering that Collaborators have limited permission for personal use of the Internet and computer equipment, all information contained in these equipment is property of the Company, therefore, Collaborators should not have any expectation of privacy with respect to that information or to the use they make of computer equipment and Internet networks.

PRUDENCE, SAFETY AND HYGIENE AT WORK



Every day we make decisions within the Company. Prudence is the art of deciding assertively in situations of constant change, on a day-to-day basis, at every moment of life. It consists, first of all, in knowing how to listen to others, in the first place, to those who present us with a certain problem, since only those who listen attentively are in a position to fully understand the problem that they have to solve. The reckless, on the other hand, does not listen, because while being informed he is thinking about the supposed solution. In addition, a prudent person analyzes the advantages and disadvantages, asks for advice from the corresponding areas of the Company, before making decisions, knows how to exercise due caution before executing the decisions or instructions given to him.

Due to the nature of the work carried out in the Company, prudence is a habit that our Collaborators must cultivate and develop with special commitment and care, as it will help us avoid accidents. For example, serious accidents at nuclear plants or oil rigs have been caused by reckless conduct, commonly known as “human error”.

A fundamental part of labor prudence is that which refers to managerial work at any level of the command line. Being prudent, being the head of a team, means analyzing the surrounding conditions, such as the weather, the health or fatigue of the people in your charge, the level of danger of a task or the possible risks it represents. These and other reasons must be considered by the Managers and Collaborators with supervisory or command functions to decide with the greatest success and the least possible risk.

At OPEX we have adopted professionalism as a work philosophy based on **extreme attention to detail** (punctuality, perseverance, attention, precision, etc.) and taking care to finish what we start before starting another task. In this sense, special care must be taken to fulfill the **duty of informing** the immediate superior about the conclusion of the entrusted work in order to optimize time and resources. In addition, in this way we will avoid risks due to human errors, due to lack of attention to detail or due to inadvertence of the possible consequences of our decisions and actions. All of which, in an industrial branch of our profile, can lead to disasters with enormous social and environmental impact.

A relevant aspect of a job well done at OPEX consists of paying attention to the things we do, avoiding distractions. A good piece of advice to achieve this would be this: do 'what is due' at all times and pay attention to 'what is being done', without neglecting the small details, because that is where the most serious risks and the greatest successes can lie. .

The safety of our facilities and the means of transportation that we use is a priority duty of the Company that is updated on a day-to-day basis when each one of its Collaborators respects full compliance with the technical, legal and operational procedures, as well as the OPEX internal standards.

It is the duty of each one to know, study and apply the guidelines or procedure manuals, the operation protocols and handling of machinery, and notify the Directors when obsolescence is perceived.

The personnel in charge of the various work areas are responsible for ensuring that they remain in good safety and hygiene conditions. In this way we can prevent accidents and have humanely decent and dignified spaces. In the event that a Collaborator considers that the hygiene or safety protocols are not being complied with, they must immediately contact their supervisor, the Human Resources Department or the Legal Department to inform them of the risks involved.

SOCIAL RESPONSIBILITY: OUR SHARED VALUE MODEL

The economic, ethical and legal model proposed for our Company's social responsibility programs is the so-called **SHARED VALUE MODEL**, based on which we encourage the responsible participation of all the people who directly and indirectly interact with our job.



In our day-to-day work we share risks with our business partners, suppliers and customers, but we can also share benefits, advice and achievements. For this reason, we support initiatives that tend to share our knowledge, experience and talent, since we do not confuse professional secrecy or protection of confidential information with the absolute closure of communications.

We always seek to be open to contributing to the improvement of other companies, communities, groups, organizations and society in general. It will suffice to maintain the prudence of consulting the Legal Department within the Company in case of doubts about this shared value policy that has characterized us from the beginning.

Shared value adds efforts between our Company and its environment (natural communities, social groups, municipalities, etc.) in such a way that there are many who, in a value chain, have left part of their effort in the provision of our services. , and they must receive part of the benefit (jobs, opening of highways and roads, economic movement, etc.)

SUSTAINABLE DEVELOPMENT AND ENVIRONMENTAL PROTECTION



OPEX, aware that natural resources are planetary assets that humanity should take advantage of, is committed to adopting international sustainable development programs in its internal regulations in order to contribute to improving the economy and well-being of citizens. countries and people and take firm steps in the consolidation of SUSTAINABLE DEVELOPMENT programs.

OPEX assumes as its own the principles of respect for the Environment contained in the United Nations Environment Program (UNEP, Resolution 2997, XXVII of 12.15.1972), especially with regard to compliance with the rules on biocapacity reserve, exports of hazardous waste, emissions of organic water pollutants, CO2 emissions and other greenhouse gas emissions, as well as the management of chemical waste, industrial waste and protection of maritime biodiversity.

Our Company must implement security systems that guarantee permanence as well as adaptability and respect for the natural environment. For this reason, all our Collaborators must include in their work programs the item of protection and defense of the environment, and in the event that they presume that any activity carried out on behalf of the Company has a negative environmental impact, they must immediately notify the Directors. or to the Legal Department in order for them to take the appropriate measures to deal with the situation.

In this area, we must be especially careful, since some contamination events could lead our Collaborators and the Company to incur criminal liability for environmental crimes, for which reason, all Collaborators will carry out their activities always taking environmental care into consideration.

INTERNATIONAL TRADE RULES



Associates directly concerned are required to understand and comply with the laws and regulations regarding trade embargoes, boycotts, and other restrictions involving foreign countries and businesses. Since the laws related to these issues are very complex, approval must be obtained from the Legal Department or the General Directorate before agreeing to any type of commercial restriction.

FAIR COMPETITION



We know that the quality and prices of our services are the main reasons why our clients choose us. Therefore, we must respect the Company's competitors by carrying out our activities with adherence to ethics and competitive loyalty.

WE MUST PREVENT CRIMES



It is prohibited to plan, organize, incite, collaborate, try, hide, cover up or carry out conduct that is or may be criminal, whether against the Company, the other Collaborators or any third party.

It is also prohibited to plan, organize, incite, collaborate, try, hide, cover up or carry out criminal conduct under the justification of preserving or improving our productivity, quality of services or achieving the supposed "fulfillment of our goals".

WE ACT CONGRUENTLY

We take care of the corporate reputation with our own reputation.

The trust that customers, authorities, suppliers and the public place in the Company and its Collaborators is our reason for being and the value by which we can continue to develop professionally.



Each one of the Collaborators, being the image that represents the values and professionalism of OPEX, must conduct themselves in accordance with the provisions of this Code of Conduct, OPEX's internal regulations and current laws, outside the facilities of the Company, and even their work hours, especially when their conduct may put the Company or other Collaborators at risk.

THE VALUE OF ASSESSMENT



OPEX, directly or through third parties, may carry out at any time, and without prior notice, audits, inspections or legitimate evaluations, both at the level of people, processes, documents, data, information, contents, furniture, facilities, offices, work and computer equipment, in order to evaluate the performance and productivity of the Collaborator, obtain information, investigate possible violations of OPEX's internal regulations or current laws, as well as prevent, detect and/or mitigate the commission of any illegal or criminal conduct .

DON'T SHUT UP: INTERNAL COMPLAINTS CHANNEL



All Collaborators are obliged to report to the Company's Internal Complaints Channel any situation or conduct that is or may be contrary to this Code of Conduct, OPEX's internal regulations and/or the laws in force that govern the Company.

All reports to the Internal Complaints Channel are anonymous, unless you voluntarily prefer to provide your name.

Reports can be made in the following ways:

Personally before the Legal Department,

Call the telephone number: 55 5716 5150

To the email: nsaldana@opex.mx

By written letter addressed to the Legal Department of the Company with the title "Report", at the OPEX offices located at Avenida Paseo de la Reforma number 2654, 19th Floor, Colonia Lomas Altas, Miguel Hidalgo Mayor's Office, in Mexico City.

If you have doubts about the way to proceed in situations that could lead to a breach of this Code of Conduct, OPEX's internal regulations and/or the current laws that govern the Company, you should not act or commit to something, without first having consulted with your hierarchical superior or with the Legal Department.

It is prohibited to retaliate or take revenge against any Collaborator who has reported, investigated and/or penalized a violation of this Code of Conduct, OPEX's internal regulations or laws. OPEX will execute the actions at its disposal to protect these Collaborators.

It is prohibited to make improper use or in bad faith of the Internal Complaints Channel, since making complaints knowing that they are false or with the purpose of harming someone or obtaining an undue benefit, are also acts that violate the Code of Conduct.



BREACH OF THE CODE OF CONDUCT

Any conduct committed by a Collaborator in violation of the provisions of this Code of Conduct, OPEX's internal regulations or the laws that govern the Company, is a justified reason to impose sanctions and disciplinary measures, including the legitimate termination of the relationship. agreement between the Collaborator and the Company, without any responsibility for OPEX.



Internal sanctions and disciplinary measures include, among others:

- ✓ Verbal admonition.
- ✓ Written reprimand.
- ✓ Temporary suspension without pay.
- ✓ Termination of the legal relationship with the Company.

In addition to the legitimate sanctions and disciplinary measures, the corresponding legal procedures and actions may be initiated.

COMMENTS, DOUBTS, COMPLAINTS AND SUGGESTIONS



If you have comments, doubts, suggestions or complaints about the content, compliance or interpretation of the Code of Conduct, OPEX's internal rules or laws that govern us, it is your obligation to let them know immediately, either to your superior or to the Legal Department. In the event that the doubt, suggestion or complaint comes from the Legal Department, you should consult the General Director of the Company.

This Code of Conduct is a general guide on our values and basic principles of action, and cannot provide an answer for each specific situation. For this reason, in addition to the fact that you can always ask your superior or the Legal Department for advice, we offer you a series of questions that you should ask yourself when faced with possible dilemmas about whether any conduct or situation is contrary to our Code of Conduct , OPEX internal regulations or laws.

These questions are written in the first person, but they also apply to third-party actions.

Am I acting in accordance with the Company's values?	If the answer is negative, ask your superior or the Legal Department for advice
Is what I am doing ethical and is it in accordance with our Code of Conduct and internal rules of Grupo CME?	If the answer is negative, ask your superior or the Legal Department for advice
Is what I'm doing legal?	If the answer is negative, ask your superior or the Legal Department for advice
If this were to become public knowledge, would it affect my reputation and/or that of the Company?	Si la respuesta es afirmativa, pide asesoria your superior or the Legal Department

By signing and writing your name and signature on this document, you state that you understand, comprehend and voluntarily accept the obligations and the entire content of this Code of Conduct, as well as the consequences that derive from it.

Two prints of this Code of Conduct are signed, one will be delivered to the Collaborator and the other to the Company.

Date, full name and signature of the Collaborator



"This Code of Conduct is a general guide on our values and basic principles of action."

