

GEMOIS Group



CODE OF CONDUCT



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MESSAGE FROM THE CEO

Our Code of Conduct integrates the fundamental principles and guidelines applicable to all internal and external collaborators of the GEMOIS Business Group and its subsidiaries (the Organization). It is everyone's responsibility to comply with and enforce it.

We aim for each collaborator's behavior to be consistent with our organizational culture (Mission, Vision, and Values), promoting principles of personal and professional integrity in all aspects of their activities.

We are committed to building a corporate culture of transparency and integrity, based on ethical behavior and compliance with the law. Therefore, it is essential that we are people of high moral quality and that it comes naturally to us to comply with and lead by example.

The provisions of our Code of Conduct provide us with the satisfaction of having acted with integrity and respect towards the Organization and our colleagues, fostering an environment of cordiality and trust by maintaining clear and honest communication about our actions.

A handwritten signature in blue ink, reading "Luis Miguel", with a long horizontal flourish underneath.

INTRODUCTION

Definition of the Code of Conduct

In our Organization, we are convinced that we can improve every day. To achieve this goal, we must put into practice the organizational values that define us.

This Code of Conduct outlines the general principles that govern the daily behavior of all individuals (internal or external) who collaborate within this Organization.

Our Code of Conduct is based on the following principles:

- Respect for people (Our Collaborators)
- Care for the environment and respect for the community (Our Environment)
- Care for the relationship with customers, suppliers, competitors and authorities (Our relationships)
- Compliance with Law, Policies and Regulations (Regulatory Framework)

Purpose of the Code of Conduct

The purpose of the Code of Conduct is to promote the practice of the Organization's values (integrity, teamwork, service, innovation, and determination) and to advance the ideals of conduct that should be observed by each of our collaborators.

Scope of the Code of Conduct

This Code of Conduct applies to all internal and external collaborators of the Organization and any person who visits our facilities.

OUR COLLABORATORS

Human rights

- We respect people's dignity, freedom and privacy.
- We do not tolerate verbal, physical, or visual behavior that undermines the dignity and respect deserved by our collaborators.
- We are committed to fostering and maintaining a supportive organizational environment where any acts of harassment, defamation, violence, intimidation, discrimination, or any other behavior that violates our values are condemned, prohibited, and reported.
- We respect and value all our collaborators regardless of their gender, origin, race, marital status, age, opinions, political orientation, creed, religion, tribe, association, union affiliation, ethnicity, social or economic class, pregnancy, sexual identity, illness, disability, or nationality.
- We promote diversity and inclusion, seeking to attract diverse talent that enriches our organizational culture.
- We fully support human rights and adherence to labor legislation.

Occupational Safety

- We value, respect and protect all individuals working in our Organization. Their safety is the most important thing.
- We consider the safety and health of our collaborators to be more important than any strategic objective of the Organization.
- Our internal and external collaborators can report and help mitigate any potential risks that could endanger our human capital, suppliers, or contractors.
- We take the necessary actions to ensure that occupational health and safety objectives are met:
 - Provide and maintain safe workplaces.
 - Provide and maintain a favorable work environment.
 - Develop a safety culture among staff.
- We promote safety recommendations through internal campaigns to foster a safe and favorable work environment, with the firm goal of preventing accidents and health damage that could affect our collaborators.
- All collaborators must fully comply with safety regulations.

OUR ENVIRONMENT

Commitment to Our Community

- We establish alliances with civil society organizations and other non-governmental entities as part of our social responsibility.
- We engage in public and community affairs that allow us to have a positive impact on the human and economic development of the communities in which we operate.
- We encourage employees to exercise their right to active citizenship and free association, without involving the Organization and making it clear that they must act freely in their personal capacity and not on behalf of the Organization.

Environment

- We recognize our obligation to protect and conserve the environment as part of our social commitment.
- We encourage the implementation of technologies that minimize the impact of our operations and promote environmental respect.
- We take actions to ensure that:
 - Emergency response procedures are implemented to minimize the impact of unpredictable incidents.
 - Necessary measures are taken to prevent environmental accidents.
 - Significant changes in our processes are assessed in advance to prevent adverse environmental impacts.
 - Waste generation is reduced, and disposal practices comply with current legislation.
 - Efficient use of water and electricity is promoted, and their conservation is encouraged.
 - Recycling and reuse of operational waste are promoted.
 - The conservation of the Organization's green areas is promoted.

OUR RESOURCES

Use of Assets

It is the responsibility of the collaborators to:

- Use the Organization's name and image solely for the benefit of the Organization.
- Protect and preserve all physical assets of the Organization.
- Safeguard intellectual property and intangible assets: software, licenses, trade secrets (know-how), etc.
- Use the company's assets efficiently, prudently, and responsibly, only by duly authorized individuals, always contributing to the achievement of strategic objectives.
- Each collaborator is responsible for protecting the facilities and assets assigned to them against any unauthorized use, breach of trust, or negligence.

Information Management

It is the responsibility of the collaborators to:

- Be aware of their responsibility in protecting and preserving the information they manage through the Organization's technological resources.
- Use and protect access accounts and passwords for our technological resources responsibly. It is considered a serious offense to use another collaborator's user account and password.
- Not disclose privileged or confidential information, including trade and intellectual secrets, commercial agreements, market information, strategic plans, and investment projects, etc.
- Exercise professional judgment in social settings, avoiding the disclosure of sensitive information.
- Record all operational, accounting, and financial information accurately, timely, and truthfully, in compliance with current regulations.
- Maintain the confidentiality of information even after terminating their employment with the Organization and assume legal responsibility for any breaches.
- Obtain and handle third-party personal data responsibly and in compliance with applicable laws.
- Avoid sharing photographs or videos of our facilities that could harm the Organization's image or that of its collaborators.
- Report to the Transparency Line any situation that could damage our reputation to receive an organizational response.
- Those engaged in extracurricular activities, such as lecturers, speakers, or students, may only use information classified as public for their presentations.

OUR RELATIONSHIPS

With Clients

- We focus on client satisfaction by offering honest and transparent service.
- We do not make unfounded comparisons with competitors' products and services.
- We understand our clients' consumption needs and fulfill all commercial commitments we make.

With Suppliers

- We work with suppliers who share our values and agree to respect our Code of Conduct.
- All acquisitions of goods and services must comply with the guidelines of the Purchasing Policy and be negotiated at market prices.
- We ensure equitable participation of suppliers based on quality, profitability, and service criteria.
- It is considered a serious offense to request or receive any type of incentive from suppliers.
- We only accept or offer gifts and courtesies of insignificant promotional value not exceeding the equivalent of USD 200. (If the amount exceeds this limit, acceptance of gifts, courtesies, meals, travel, business or sports events must be authorized by the Conduct Committee or the designated person for this function.)

With Competitors

- We do not engage in any agreements between competitors, clients, or suppliers that aim to restrict the free market.
- Our interactions with competitors are conducted with professionalism and full adherence to the Organization's values.
- We promote compliance with the Federal Economic Competition Law.

With Government and Authorities

- We promote full compliance with the laws and regulations established in the territories where we operate.
- All our collaborators must adhere to all laws applicable to their activities.
- We cooperate and offer courteous treatment, fostering openness and trust that promotes dialogue and the establishment of agreements.
- We address the requirements and observations of authorities, aiming to assist in fulfilling their mission within the scope granted by the law.
- We act in accordance with the law in defense of the Organization's legitimate interests.

- Interaction with government agencies or officials is conducted in compliance with applicable laws and this Code of Conduct.
- Only authorized personnel from the Organization may represent it in visits or requests from authorities.
- The Organization is committed to fulfilling its tax and duties obligations.

COMPLIANCE

Regulatory Framework

All our collaborators must comply with:

- The laws, regulations, and legal requirements of the territories in which we operate.
- The Code of Conduct, Policies, Standards, Procedures, and Regulations established by the Organization.

Anti-Corruption Stance

- Collaborators must demonstrate a culture of transparency and avoid any acts of corruption in all their activities, both inside and outside the Organization.
- The Organization does not permit:
 - Authorizing acts of corruption.
 - Inducing anyone to commit acts of corruption.
 - Any form of bribery to government officials or facilitators.

Declaration of Conflicts of Interest

- All collaborators must act with loyalty, honesty, and in favor of the Organization's interests.
- All collaborators are required to disclose in writing any situation that exposes them to a real or potential conflict of interest with any third party interacting with the Organization.
- A potential conflict of interest is a situation where the Organization's interests could be compromised by the personal interests of employees, their family members, acquaintances, or associates.

RESPONSIBILITIES OF THE CODE OF CONDUCT

Board of Directors

- Approve the Code of Conduct in coordination with the CEO.
- Promote compliance with the Code of Conduct and the Organization's values.
- Monitor non-compliance issues reported by Internal Audit.

CEO

- Approve and disseminate the Code of Conduct among collaborators.
- Ensure compliance with the Code of Conduct.
- Confirm that all staff, suppliers, subcontractors, commercial and non-commercial representatives, consultants, and anyone providing services to the Organization are aware of and understand the provisions of this Code of Conduct.
- Establish a Conduct Committee to evaluate non-compliance and to implement sanctions.

Collaborators

- Understand and comply with the Code of Conduct.
- Report any possible breach of the Code of Conduct.
- Know and use the Transparency Line if necessary.
- Sign the commitment letter to comply with the Code of Conduct.

Human Resources

- Disseminate the Code of Conduct among collaborators by providing a copy of the Code of Conduct and collecting the commitment letter to comply.
- Include topics contained in the Code of Conduct and Transparency Line in induction and training programs.
- Implement campaigns to promote the Code of Conduct.

Internal Audit

- Evaluate compliance with the Code of Conduct.
- Inform the Conduct Committee about any non-compliance with the Code of Conduct.
- Investigate and follow up on situations reported through the Transparency Line or any other reporting channel.
- Resolve any questions about the interpretation of the Code of Conduct.
- Provide training to promote compliance with the Code of Conduct and reporting channels.

TRANSPARENCY LINE

Definition of Transparency Line

- The Transparency Line is a formal channel for receiving any type of report or non-compliance with the Code of Conduct, available to both internal and external collaborators (clients and suppliers).
- The Transparency Line is available 24 hours a day, every day of the year, and is confidential.
- The Transparency Line is independently managed by the Internal Audit department.
- Collaborators will always have open communication to report any concerns about compliance with the Code of Conduct to their immediate supervisor. These reports should be communicated to the Internal Audit department for advice or to report a non-compliance issue.
- Total confidentiality will be maintained for each report received from collaborators or third parties, whether collected through the Transparency Line or any other means.
- We do not take any form of retaliation against individuals who report and/or cooperate in good faith in investigations of non-compliance with any provision established in the Code of Conduct.
- We encourage reporting situations that may compromise the objectivity of our collaborators due to pressure from third parties who use their authority, hierarchy, or influence to act against the Code of Conduct.

Company	Email	Hotline
REGIOPYTSA	lineatransparente@regiopytsa.com	+52-818-156-5502
PYTCO	lineatransparente@pytco.com	
QUALITY TUBE	lineatransparente@qualitytube.com.mx	
AP TSA	lineatransparente@aptsa.com.mx	

Disciplinary actions

- Non-compliance with this Code of Conduct will be subject to disciplinary measures and actions where appropriate.
- The actions to be taken will be determined based on the severity of the infraction, always assessed by the Conduct Committee established by the CEO.
- Disciplinary actions range from written reprimands, dismissal, or reporting to the competent authorities.
- Each case must be investigated and documented with all available evidence before assessing a non-compliance with the Code of Conduct.
- Failing to apply disciplinary actions to previously identified non-compliances is considered a violation of this Code of Conduct.