



ALEATICA

CODE OF CONDUCT FOR ALEATICA SUPPLIERS

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1. MESSAGE FROM THE ALEATICA CEO

Our mission consists of developing and operating smart transport solutions that exceed the expectations of our customers and stakeholders, while contributing to the sustainable development of our planet.

To this end, we have identified the values that reflect who we are and the way that we act in pursuit of this mission: Safety first, Social and environmental sustainability, Service excellence, Corporate integrity and Passion for the team.

These values represent the pillars on which our company is built and this Code of Conduct for Suppliers establishes the general action guidelines that the Suppliers who work with us need to comply with at all times throughout the entire duration of our business relationship.

Ethics is an essential undertaking for all, and it is the way we are, One way, One ALEATICA.

2. OBJECTIVE

ALEATICA is firmly committed to acting with integrity and transparency in the operations we perform and in our relationships with third parties, and that is why we have committed to upholding these values, creating a Compliance Program, of which this Code forms a part, the objective of which is to express our way of doing business with third parties based on the values of our company.

The Code of Conduct for ALEATICA Suppliers (hereinafter, the Code) is understood as an extension of ALEATICA Code of Ethics and Conduct and the goal is to establish the guidelines that, at a minimum, must direct the ethical behavior of the suppliers, contractors, service providers, consultants and advisors (hereinafter, Suppliers) we work with, based on our values and the law of each of the countries where we have operations, respecting the values of their respective cultures, in the activities they carry out in their business relationship with ALEATICA.

ALEATICA assumes the commitment of promoting and encouraging among its Suppliers, without prejudice to compliance with the contractual conditions established, and under the premise of respect for the power of management, adoption of practices that are in line with the guidelines included in this Code. In addition, ALEATICA will make the necessary methods available to its Suppliers for them to be aware of and understand this Code so that they can assume compliance herewith.

3. APPLICATION ENVIRONMENT

This Code is directed to all Suppliers that have a relationship with any of the investee companies over which ALEATICA has management control and shall remain in effect throughout the entire duration of such relationship.

Compliance herewith is independent of the location in the world where such Suppliers operate, without prejudice to compliance with the institutional and legal framework in place in each country.

4. OUR VALUES

The values that define us are the pillars that support us. Through our actions we create safe roadways. Thus, the company's values are reinforced in all our actions and projects.



Safety First

We are working to implement a comprehensive Safety Management System that seeks to continually improve the safety conditions for our customers and employees, and to promote a culture of safety in our environment.



Social and Environmental Sustainability

We are implementing a comprehensive sustainability program to guarantee quantifiable conditions that help achieve the Sustainable Development Goals of the UN 2030 Agenda. We take on these goals as our own.



Service Excellence

We work to continually improve the service we offer to each of our users, maintaining the highest standards of safety. To achieve this, we develop cutting-edge technology that allows us to provide a travel experience that is safe, fast and comfortable.



Corporate Integrity

We conduct ourselves in a way that is ethical, upright and transparent in all circumstances. That is why we are committed to always adopting the international best practices for integrity, transparency and corporate governance, to guarantee a highly reliable service for our customers, users and communities.



Passion for the Team

Day after day we encourage the adoption of a healthy organization model where our workers come together as a single team that lives out our corporate values.

5. SUPPLIER COMMITMENTS

For ALEATICA, the commitment it makes with its Suppliers forms part of the values it works under, since it recognizes that its relationship with its Suppliers is a key part of the good development of its business. That is why it invites them to share in this commitment with the following lines of action:

5.1 Safety First

Safety and health in the workplace are fundamental aspects for ALEATICA, which is committed to providing the means necessary to minimize work risks, both for its own personnel and for its Suppliers.

The Supplier shall look out for the protection of its workers, and it must provide its personnel with the training and means necessary for them to perform the contracted work (tools, materials, among others) and to respond for any losses or damages for which they are liable due to action or omission, particularly as a result of not having adopted the preventive health and safety measures advisable to avoid them.

All Suppliers that carry out their activities at the ALEATICA facilities must at all times observe and comply with the safety procedures of the facility, and ALEATICA therefore commits to providing the necessary safety information.

5.2 Social and Environmental Sustainability

ALEATICA is firmly committed to the protection, conservation and improvement of the environment and natural capital, and it thus performs its activities based on the premises of:

- efficiency in resource consumption,
- minimal negative environmental and social impact,
- pollution prevention,
- protection of ecosystems, historic, cultural and archeological heritage and the socioeconomic environment, and
- proactive search for innovative solutions focused on ESG criteria¹.

ALEATICA Suppliers, and their respective subcontractors, shall at all times comply with and observe the standards applicable to their operations (including environmental regulations), always implementing practices that are conscious of and safe for the environment everywhere they have operations.

If it is necessary to obtain environmental permits and submit reports, the Supplier shall make sure to obtain, keep up to date and follow the guidelines for submitting reports for all environmental records and permits required so that they are legally valid at all times.

5.3 Service Excellence

ALEATICA Suppliers must provide services with the quality agreed in the formalization of the provision of the service and must respect intellectual property rights at all times and must safeguard the information provided or entrusted to them. Transfers of information and technology, as well as practical know-how, must be carried out in conformity with the applicable legislation.

¹ ESG criteria are used to make responsible investments, evaluating Environmental, Social and corporate Governance factors in order to efficiently manage risks.

Suppliers must use the company's resources in a way that is responsible, efficient and appropriate in the environment of their professional activity. They must also protect and preserve them from any inappropriate use that could prejudice ALEATICA's interests.

Also, ALEATICA does not allow the equipment that it makes available to its Suppliers to be used to run IT programs or applications that are illegal, that could damage its image or reputation, or to access, download or distribute illegal or offensive content.

5.4 Integrity, Transparency and Corporate Governance

A. Ethical and transparent operations: ALEATICA asks that the Supplier comply with all laws and standards applicable in the countries where the service is provided or the good is delivered. The Supplier must carry out its activity in compliance with the principles of business ethics and transparent management.

The Supplier undertakes to cooperate in good faith with ALEATICA with respect to the request for information, and in any investigation carried out by the latter.

B. Anti-corruption and anti-bribery: The Supplier, in its relationships with third parties and, specifically, in its relationships with authorities and public institutions in the different countries where it carries out its activity, shall act in a way that is in line with the domestic and international provisions for the prevention of corruption and bribery.

The Supplier shall not offer or promise any personal or inappropriate advantage, whether it be directly or through intermediaries, to obtain or retain a business or another type of advantage from a third party, whether public or private. The Supplier shall not pay, organize or accept bribes and shall not engage in actions that violate, or that cause its business partners to violate any applicable anti-bribery laws or standards.

The Supplier agrees to comply with the formal communication processes with ALEATICA that were established during the bidding process. Over the course of a bidding process, the Supplier invited to participate may not make any gifts or hospitality gestures, nor may it hold meetings or have informal contact with the players at ALEATICA involved in the bid and they must limit their communications to the formal channels established for such purposes.

C. Conflicts of interest: Conflicts of interest occur in circumstances where the personal interests of ALEATICA's employees or the employees of its Suppliers, either directly or indirectly, go against or clash with ALEATICA's interests and may interfere with their compliance with their professional duties or responsibilities, or may cause them to become personally involved in an ALEATICA transaction or economic operation.

Suppliers must inform ALEATICA of any situation that could be considered a conflict of interest and must disclose to ALEATICA any situation where a Supplier employee has an interest of any kind in ALEATICA's business.

5.5 Passion for the Team

The Supplier must respect human rights, including labor rights, in all of its business activities. This shall include, at least:

- Freedom of association and the right to collective negotiation: The Supplier must grant its employees the right to freedom of association and the right to collective negotiation, as established in the applicable laws and standards.
- Forced labor **or** modern slavery: The Supplier must not, under any circumstances, use or obtain a benefit of any kind from forced labor or employing their workers in subhuman conditions..
- Employment practices: The Supplier shall only employ workers with legal authorization to work at the facilities and is responsible for ensuring that the employees are suitable for the work through the appropriate documentation.
- Minimum hiring age: Child labor by the Supplier is strictly prohibited.
- Fair and just treatment: The Supplier must act with respect and integrity in the treatment of its employees, without discrimination based on factors like race, color, religion, gender, age, physical aptitude, nationality, sexual orientation, political affiliation, union membership, medical tests or marital status.

6. ETHICS CHANNEL

ALEATICA makes its Ethics Channel called 'I CARE' available to all third parties with which it has a relationship.

This channel is an essential tool for receiving reports of irregularities, questions or ethical dilemmas, and it is administered through an external supplier, allowing us to guarantee the principle of no repercussions for whistleblowers, as well as anonymous reporting.

The 'I CARE' Ethics Channel can be accessed online and by phone, at the following addresses:

- Internet: <http://icare.aleatica.com/>
- Toll-free number:
 - i. Chile: 1230 020 3559
 - ii. Colombia: (+57)-13816523
 - iii. USA: 800 461 9330
 - iv. Spain: 900.905460
 - v. Italy: 800.727.406
 - vi. Mexico: 800.681.6945
 - vii. Peru: 0800.78323
 - viii. United Kingdom: 0-(808)-189-1053

Other countries: Access the website <http://icare.aleatica.com/> and indicate the country of origin to obtain the rest of the toll-free numbers.

7. COMPLIANCE WITH THE CODE

ALEATICA expects the Supplier to respect all of the applicable laws and standards and, specifically, those related to the pillars described in this document, and for them to make an effort to comply with international and sector standards, as well as best practices, in all matters related to their relationship with ALEATICA.

Failure to comply with this Code or violation hereof may constitute grounds for termination of the business relationship with such Suppliers, depending on the severity of the violation and the specific circumstances. Violations shall be analyzed based on the internal standards, legal standards and agreements in place and the executed agreement, and any corresponding penalties shall be applied.

Prior to doing so, based on the nature and severity of the breach, and in order to improve management of these types of matters by the Supplier, ALEATICA shall discuss the situation with the Supplier itself to analyze the reasons for the violations that occurred and to encourage implementation of the corrective actions required to avoid recession of the contract.

Appendix 1. Acceptance of the Code of Conduct for ALEATICA Suppliers

At _____, at ____ of _____, of the year ____.

I, _____, with position _____, acting on behalf of the company _____ and with respect to the business relationship that the company I represent maintains with ALEATICA or any of its subsidiaries² as a supplier, certify that I have received, understood and accept the values and commitments set forth in the ALEATICA Supplier Code of Conduct, and I undertake to act in accordance with them with respect to the relationship with ALEATICA.

Signature: _____

Name: _____

Date: _____

² ALEATICA S.A.U. is a multinational group comprising the following companies: Euroconcesiones S.L.U. ; Euroglosa 45 Concesionaria de la Comunidad de Madrid S.A.U. ; Magenta Infraestructura S.L. ; ALEATICA Emisiones S.A.U. ; Pachira S.L. ; Terminal de Contenedores de Tenerife S. A.U. ; Terminales Marítimas del Sureste S.A. ; Terminal Polivalente Sureste S.L.U. ; ALEATICA Labs S.A.U. ; ALEATICA Concessoes Ltda. ; ALEATICA S.A.S. ; Autopista Río Magdalena S.A.S. ; ALEATICA S.A. ; Terminal Cerros de Valparaíso S.A. ; Operaciones Portuarias Valparaíso Spa ; Operaciones Cerros Valparaíso Spa ; Sociedad Concesionaria Puente Industrial S.A. ; Sociedad Concesionaria Nuevo Camino Nogales - Puchuncaví S.A. ; Autovías Concesionadas S.A. de C.V. ; Autopista Urbana Norte S.A. de C.V. ; Concesionaria AT-AT S.A. de C.V. ; Conservación MM S.A. de C.V. ; Latina México S.A. de C.V. ; ALEATICA S.A.B. de C.V. ; Operadora Concesionaria Mexiquense S.A. de C.V. ; OTM Servicios de Pago S.A. de C.V. ; Seconmex Administración S.A. de C.V. ; S.A. de C.V. ; Administradora de Acciones de Toluca S.A. de C.V. ; ALEATICA Labs S.A. de C.V. ; Viaducto Bicentenario S.A. de C.V. ; ALEATICA Investments S.A. ; 0606 ALEATICA Investments S.À.R.L. ; Autopista del Norte S. A.C. ; Operadora de Carreteras S.A.C. ; Concesionaria Mexiquense S.A. de C.V. ; Construcciones Amozoc-Perote S.A. de C.V. ; Grupo Autopistas Nacionales S.A. ; MANOP S.A. de C.V. ; OPCEM S.A.P. I. de C.V. ; Organización de Proyectos de Infraestructura S.A.P.I. de C.V. ; Autovía de Aragón ; Autostrade Lombarde SpA ; Società di Progetto Brebemi SpA ; Argentea Gestioni S.c.p.a. ; M6 Toll.