

# Code of Integrity | 2024



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To ensure simplicity and readability, this document uses the masculine gender generically. However, it is clarified that all references included apply equally to people of all genders.



“This document is not just a guide; it is a collective commitment to integrity and excellence.”

Marcus Baur, 2024

## Message from the President of Bocar

Dear Collaborator,

At **Bocar**, we aspire to be recognized in the automotive industry as a reliable partner, delivering the highest quality products and adapting to the needs of our customers. Aligned with this vision, we are committed to standards of excellence in **Quality, Sustainability and Corporate Integrity**.

We have taken on the challenge and this motivates us to direct our actions to promote the Corporate Integrity agenda in the Industry. In the face of a global reality of great dynamism; Technologies, markets, the level of demand, challenges and laws change very quickly, however, our values remain firm.

Our mission is a commitment to community development and human rights. We strive to be fair, equitable, diverse, and inclusive across our operations.

Health, safety and integrity are at the heart of our company culture.

Our responsibility towards employees goes beyond production; it is a commitment to their integral well-being. In addition, we reinforce our commitment to sustainability, good corporate governance and environmental preservation. We understand that these elements are essential not only to our current success, but also to the legacy we leave to future generations.

All this is reflected in the Code that you now have in your hands. This document is not just a guide;

it is a collective commitment to integrity and excellence. Each of you plays a vital role in this journey.

I invite you to live and breathe the principles, values and behaviors expressed in this Code. In case you find deviations, I encourage you to report them through the available channels.

Integrity is a living, participatory culture. If you need guidance or clarification on the behaviors described, the Compliance Department is here to help. Our values have been the key to Bocar's success for more than 60 years. Today, more than ever, we remain committed to these principles, guiding our path to a sustainable and integral future.

Kind regards,  
Marcus Federico Baur  
**Presidente de Bocar**



“At Bocar, integrity is the backbone of our operations.”

Karl Schary, 2024

## Message from the CEO

Dear Colleagues

It is a privilege to address you at a crucial time for our Group.

We face challenges and opportunities that demand the highest level of commitment to integrity, ethics, sustainability, corporate responsibility and human rights in all our actions.

It is in this context that I am pleased to present to you our renewed Code of Integrity, a robust framework that reflects our core values and sets clear expectations for all members of our organization.

At Bocar, integrity is the backbone of our operations. This code is not simply a set of rules; It is an expression of our shared commitment to act honestly, transparently, and responsibly in all our business interactions.

Through this document, we reaffirm our commitment to building and maintaining a corporate culture based on our guiding principles.

The responsibility falls on each of us to live these values day by day. Our future successes will be built on ethical decisions, comprehensive actions and a firm commitment in different areas.

I invite each member of our team to internalize these principles and actively contribute to fostering a culture of integrity, sustainability, corporate responsibility, and human rights.

I am confident that together we can cement our legacy as an exemplary organization in business ethics.

Thank you for your continued commitment.

Kind regards

Karl Schary

CEO of Bocar January 2024

# Our Code of Integrity

This Code of Integrity, approved by the Board of Directors of Bocar, comprises a set of ethical principles and standards of business behavior that form the basis of our organizational culture.

This code is the reflection of our commitment to five essential macro themes, based on the following strategic pillars:

- I. Community Development and Human Rights.
- II. Corporate Responsibility, Ethics and Integrity.
- III. Sustainability.
- IV. Corporate Responsibility compliance with Laws and Regulations.
- V. Data protection and information security

The Integrity Code guides our actions in an ethical and transparent manner, regulating our interactions within the company as well as with clients, shareholders, suppliers and business partners. Our principles:

- **Caring for PEOPLE.**
- **Pursuing EXCELLENCE.**
- **Acting SUSTAINABLY.**
- **Leading INNOVATION.**

They are essential to help us to guide our decisions. It is important that collaborators know and comply with this code, to strengthen Bocar's organizational culture.

## To whom does this Code apply and who must comply with it?

This Code applies to all Bocar employees, regardless of their position within the company, including employees, directors, members of the Board of Directors and third parties acting on behalf of the company.

All individuals or organizations with business relationships with our company are also expected to follow the principles of this Code of Integrity. In short, everyone involved in our operations must follow the guidelines and principles set forth in the Code.

## Ethical and Moral Compass of Bocar

Bocar's Ethical Compass addresses common ethical and conduct issues, but cannot cover all eventualities given the various laws in the countries where we operate.

This guide urges us to act in line with the principles of the Code. In the face of ethical dilemmas, it is suggested to consult internal resources, such as policies and procedures available on the intranet.

Ask ourselves key questions to assess the situation:

Is it legal?,

Does it give benefit to the company?,

Is it consistent with the Code and Public Acceptance?

If all the answers are affirmative, you can move forward.

If you have a negative answer to the afore mentioned questions or if you have doubts, then stop, consult and follow the strictest regulations. Compliance advice is recommended, prioritizing the observance of the most rigorous laws.

# I. Community Development and Human Rights

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We firmly believe in respecting Human Rights as an essential value in our business operations. We apply this commitment in our interactions with employees, business partners, and the communities where we operate.

We commit to following the United Nations Universal Declaration of Human Rights and the principles of the International Labour Organization to ensure respect for and compliance with human rights.

Our position is expressed in the respect, protection and promotion of human rights, and we strongly reject forced labor, child exploitation and human trafficking. Additionally, our human resources policies are designed to prevent the incorporation of people whose ethical principles are not aligned with ours. We have a strong commitment to social and community development, seeking to build a future in which people and communities thrive.

We work closely with employees and the communities where we operate to support their well-being, growth and development, both personal and professional. Our approach includes the promotion of projects and programs that promote education, employment, health and the improvement of the quality of life, with a comprehensive perspective of justice, equity, diversity and inclusion, which we continuously evaluate.

We seek innovative ways to empower communities, foster equality and improve the quality of life of the people around us. We value partnerships with local organizations and community leaders to ensure a positive and lasting impact.

We seek a transparent and non-judgmental environment, fostering mutual respect, cooperation, diversity and tolerance. We believe that these values are key to achieving high levels of productivity, competitiveness, innovation, creativity and efficiency.

We want all our employees to feel included and motivated in a work environment where equity and dignity are guaranteed for each individual, regardless of their origin, personal characteristics or medical situations.

We do not allow any action that leads to discrimination in any form.

We are committed to establishing an environment free from discrimination, including, but not limited to: race, gender, nationality, socioeconomic status, ethnicity, religion, age, disability, sexual orientation, gender identity or expression, political opinions, trade union membership, marital status, pregnancy, ideology, appearance, presence of tattoos, or health status.





# **We are fair, equitable, diverse and inclusive**

We provide equal opportunities to all individuals. We promote labor equity by ensuring that all our employees are better in their professional and personal lives, guaranteeing opportunities for all.

Our process of selecting, hiring and promoting our collaborators is always based on based on their qualities and aptitudes, ensuring a fair and unbiased evaluation. We recognize and value diversity in all its forms.

## **Working conditions and child labor**

We strongly oppose child labor, reject forced labor, slavery and human trafficking. We do not hire minors under 16 years of age and we follow the International Labor Organization standards on child labor.

This commitment applies not only to our internal operations, but also to the conduct expected from our business partners. We are determined to promote a safe, respectful and dignified work environment.

## **We promote a work environment free of workplace harassment and intimidation**

We seek an environment where respect prevails and confidence at all times. We recognize the value of every employee and are committed to treating everyone with dignity. For this reason, at all levels of the company and in each place where we operate, we do not allow behaviors that affect the physical or emotional integrity of people.

We are committed to eliminating workplace violence, harassment in all its forms.

We do not tolerate verbal or physical conduct that disrupts work performance, creates an intimidating, offensive, abusive, or hostile environment.

This includes mobbing, intimidation, threats of violence and any form of violence of harassment. Leaders or people in privileged positions are not allowed to request personal favors from collaborators or third parties.

This includes avoiding abuse of power or authority that may conflict with applicable laws and regulations.





## Non-retaliation and Confidentiality

We are committed to creating an environment without retaliation. If someone shares legitimate concerns, participates in investigations, or makes good faith allegations about potential violations of our Code, policies, or laws, we ensure their protection.

This means that we do not allow dismissals, salary reductions or other adverse measures as a result of such situations.

Regardless of the outcome of the complaints, we value and take seriously every ethical expression. We encourage everyone to speak in detail in their complaints, as their voice is essential.

## Health, safety and hygiene

To be successful, we need everyone's collaboration and behaviors that promote a safe and healthy work environment for our employees and visitors.

We urge you to report any risk that may affect people. Supervisors, in particular, must ensure that activities meet occupational health and safety standards.

Safety is central to our work culture, and everyone plays an important role.

Through policies, procedures, inspections, safety committees, and training, we constantly strive to comply with occupational safety standards, ensuring the protection of all.

Within the company's facilities, the possession, sale, distribution and consumption of alcoholic beverages, drugs or substances that alter people's judgment and behavior is prohibited; Nor is it allowed to enter the company's facilities carrying weapons or work under the influence of toxic substances



## II. Corporate Responsibility

Bocar is committed to compliance, in all the locations where we operate, with laws and regulations applicable to our operation, in the same way we promote the culture of compliance among our employees, contractors and suppliers.

### Relationship with suppliers and third parties

As part of our Purpose, we seek honest and beneficial strategic relationships with customers, distributors, suppliers and third parties.

We expect all third parties with whom we interact to follow applicable laws, including anti-corruption and anti-bribery regulations, as well as industry codes and our values of ethics, integrity and transparency.

We implement an appropriate structured background screening process - Due Diligence - for third parties with whom we have or will have business relationships and those third parties working on behalf of Bocar, including, but not limited to, sales partners, contractors, suppliers, intermediaries, logistics, legal and advisory firms, unions, donation and sponsorships recipients, and government officials.

Third parties seeking to establish a relationship with any of the Bocar companies must sign a record of knowledge and acceptance of Bocar's Code of Integrity for suppliers and the Anti-Corruption Policy.

Our suppliers must be committed to acting according to our ethical, integrity and human rights standards, and to comply with relevant laws and take care of the environment. We select our third parties based on their certified ability to provide the necessary goods or services, we will never use third parties to take actions prohibited by law, this Code, or Bocar's policies. Our selection processes are fair and transparent, aimed at building long-term business relationships of trust and sustainable supply chains, without conflicts of interest.

We expect suppliers and third parties to treat others fairly and incorporate sustainable practices, both socially and environmentally responsible, into their operations, extending these expectations to the entire supply chain.



### Customer Relations

We ensure that the products we produce are safe, comply with applicable laws and meet the highest agreed standards and quality.

We provide transparent information about our goods and services, in a timely, complete, clear and truthful manner that allows our customers and users to make the best decision according to their needs and specifications



## **Antitrust and Economic Competition**

At Bocar, we operate according to the principle of free competition, avoiding monopolistic practices, cartels or actions that affect competition.

We do not make agreements, formal or informal, with competitors about prices, offers, production, distribution, terms of sale, territories or customers.

We are committed and take actions aimed at promoting competitiveness, preventing anti-competitive practices, consumer protection and fostering innovation, taking care of the custody and use of privileged information.



## **Relationship with authorities**

Our relationship with government agencies in the countries where we operate is transparent, specialized, integral and in accordance with the national and international legal framework applicable to each Bocar Business Unit.

We will never use third parties to approach any authority to perform any action prohibited by law, by this Code, or by Bocar's policies. Our approach process with government authorities is fair and transparent, aimed at building long-term business relationships of trust, without conflicts of interest.



# III. Sustainability

## Commitment to the environment and people

At Bocar, we seek to be an example of sustainability and work in harmony with the environment and people, contributing to present and future well-being. We establish a firm commitment to operate in line with the Sustainable Development Goals, the ten principles of the Global Compact and the United Nations 2030 Agenda.

We focus our actions on environmental, social and governance matters through our CEERO strategy. We establish valuable partnerships with shareholders, employees, customers, suppliers and the communities in which we operate, with the purpose of contributing to sustainable development through our business activities, thus promoting economic growth, preserving the environment and improving the quality of life in all our locations.

## Environment

We are committed to building a future in harmony with the environment, focusing on preventing damage and protecting our planet and natural resources.

In our operations, we address climate change and follow strict standards to comply with environmental regulations.

We continuously evaluate and improve our processes to meet our environmental commitment, aligning with scientific goals to limit global warming. We promote the responsible use of resources, the circular economy and the efficient management of water and energy.

We work collaboratively with customers and suppliers for more sustainable decisions in the production and use of our products and services.

We are committed to meeting or exceeding environmental laws, adopting sound practices, and constantly improving our performance through innovations and technologies.



## Governance

At Bocar, we are committed to ethics, transparency and regulatory compliance in all our operations. We promote our sustainability principles throughout the chain

of supply, maintaining ethical and transparent relationships with suppliers, promoting

fair and sustainable practices with continuous improvement.

In our commitment to sustainability, we secure the necessary resources in line with business goals and environmental, social and governance plans for proper management in this area. We communicate our sustainability performance through timely reports, including strategies, performance and key results for all the company's stakeholders.

# IV. Corporate Responsibility, Ethics and Integrity

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## Anti-corruption and anti-bribery

We are governed by principles that guide our activities in an honest, ethical and transparent manner, in full compliance with applicable laws. We categorically reject all forms of corruption, including improper payments or bribes to obtain competitive or improper advantages. Neither the company nor our collaborators participate in extortion, fraud, falsification of documents or in any activity that constitutes corruption or violates applicable laws.

Our collaborators and third parties must avoid any participation in acts of corruption or bribery in any situation.

In no case a collaborator or third party representing Bocar will make, offer, promise, pay, accept or authorize the delivery of money, offers or other benefits, directly or indirectly, with the objective of dishonestly influencing, obtaining undue advantages or affecting decisions and work behaviors.

These offers and/or improper payments are not limited to money in cash, they include gifts, entertainment, business opportunities, use of Bocar-owned services, charitable donations, political contributions and benefits for family and friends.

We do not use any type of influence over private or public individuals in order to obtain undue benefits or cause harm to people, companies or public services.

We comply with laws such as the Mexican General Administrative Liability Act, the Foreign Corrupt Practices Act ("FCPA") of the United States, and similar regulations in the countries where we operate.



### **Reception and delivery of gifts, trips or hospitality**

We understand that interaction with customers, suppliers, and third parties can be strengthened through benefits, gifts, or other goods. However, for us, giving or accepting these gestures could be considered corrupt or unethical conduct in certain circumstances.

In appropriate situations, a promotional gift with the company logo or symbolic value can be a thoughtful gesture, and a meal can be a suitable setting for business discussions.

However, the exchange of gifts, entertainment, benefits, invitations, travel, meals, personal services, or favors should be handled carefully to avoid conflicts of interest, especially if it is frequent or of great value, which could influence business decisions.

Our collaborators and third parties, on behalf of Bocar, undertake not to offer excessive gifts, trips, hospitality or entertainment to private individuals or government officials. Likewise, they refrain from requesting or accepting valuables that exceed what is reasonable or are frequent. If we receive an unacceptable gift, we politely return it and explain our policy.



If this is not feasible, we instruct our employees to report any invitations or gift, giving it to the Compliance area for approval or charitable disposition as appropriate.

Failure to disclose the receipt of gifts or invitations may be considered a breach of the Code, with penalties proportionate to the seriousness of the case

## Conflict of interest

People in Bocar should make sure that their actions, both professionally and personally, do not generate conflicts with the interests of the company.

A conflict of interest arises when personal interests, or those of close family members, clash with those of Bocar, affecting the ability to make objective decisions.

Any conflict of interest must be communicated to the Direct Manager, who will escalate it to *Compliance* for evaluation and mitigation. Direct hierarchical responsibility over family members is not allowed nor indirect hierarchical relationships.

In addition, employees should not involve us directly or indirectly in business with close family members or with companies in which they have significant roles.

It is essential that employees disclose relationships beyond friendship, especially if they share responsibilities or strategic positions that could generate conflicts of interest in decisions.

*Compliance* will support the analysis of each case. With respect to transactions with related parties, we are committed to ensuring transparency, fairness, and compliance with applicable laws and agreements.

## Donations and sponsorships

We take responsibility for supporting the development of the communities where we operate as part of our sustainability strategy.

In this regard, we consider making donations to organizations that promote social or environmental development programs, following an annual plan and carefully evaluating possible financial, reputational, operational, legal, strategic, compliance, and associated corruption or bribery risks.





In the risk identification process, we set standards for donations, avoiding for-profit recipients that may affect our reputation or pose a risk to the company. Donations are not directed to government officials or entities under their administration. We reject any donations for the purpose of bribery or corrupt practices.

Additionally, in certain specific situations, we consider sponsorships that involve allocating financial resources to entities with or without projects or events that benefit Bocar, providing advertising opportunities, participation in events and brand exposure.

## **Government officials**

Our employees, in all our locations, must interact with Government Officials in an ethical and transparent manner and in accordance with applicable laws, regulations and best practices, avoiding offering or paying money or hospitality described in our Anti-Corruption Policy in order to obtain an undue advantage.

We allow the hiring of people who provided their services in the public sector after the required legal term has elapsed. As long as the applicant does not possess privileged information that provides a competitive advantage, the hiring of which could represent a conflict of interest.

Any exceptions to the above must be authorized in writing by the Bocar Ethics Committee

## **Facilitation Payments**

Facilitation Payments, also known as "Expedite Payments" or "Expedite Payments," are low-amount payments made to government officials in order to accelerate, incentivize, facilitate, or ensure compliance with routine duties, such as the issuance of customs documents, licensing procedures, or permit management. Although not always illegal, many countries expressly prohibit Facilitation Payments under their anti-corruption laws, as they pose a significant risk of corruption.

At Bocar, we undertake not to make any type of Facilitation Payment.

## **Political contributions**

For us, political impartiality is essential in our ethical culture. Therefore, we do not make direct or indirect contributions to political parties, candidates, or political organizations.

Our collaborators are not authorized to commit, offer or endorse political contributions on behalf of Bocar. Employees interested in political or government positions should avoid associating their position with the company and refrain from using resources or the name of Bocar in political or public activities unrelated to the company.

## Prevention of money laundering and terrorist financing

We promote the fight against money laundering and the financing of terrorism, valuing the transparency in our financial operations. We are committed to complying with all relevant laws and regulations, establishing reasonable controls to prevent activities linked to money laundering or terrorist financing.

This involves preventing suspicious transactions, concealment of illicit funds, and facilitating transfers for illegal activities.

We comply with money laundering laws and terrorist financing in all the countries in which we operate. We strive to know our customers and suppliers thoroughly, conducting business only with reputable third parties, engaged in legitimate activities, and with resources of legitimate origin.

## Prevention of the use of conflict minerals

We are aware of the origin of the minerals that we use in the products we manufacture or whose manufacture we contract so that they have not been extracted in countries that have contributed to financing armed conflicts and the violation of human rights ("conflict zones").

We support the aspirations and objectives of laws relating to the origin and use of "conflict minerals", so we will not source any products containing conflict minerals from any of our suppliers.

## Use and protection of company assets

Bocar's assets include, but are not limited to, facilities, supplies, machinery, equipment, electronic devices, vehicles, tools, materials, and computer systems.

We are responsible for the proper use of assets and for protecting them from loss, damage, theft, misuse or waste. Our employees must report any loss, theft or damage to the company's assets in a timely manner to the Human Resources or *Compliance* area and to use them solely for commercial purposes legitimate and authorized.



## **Use and protection of Bocar's trademarks**

All our communication and advertising strategies, including our official platforms or on social networks, are developed in line with the institutional identity and are based on the values and principles set forth in this Code.

Our brands represent one of our core assets and are accepted as recognized brands. It is expected that the name, logo and other elements that constitute the identity of Bocar will be used only in expressly authorized activities and for purposes aligned with our communication strategy.

It is not permitted to use the name, logo and other brand properties belonging to Bocar in activities for personal benefit or other purposes other than those expressly authorized.

## **Ledgers and records**

Our records accurately and transparently reflect our transactions, supported by detailed documentation and in accordance with our accounting policies.

We implement mechanisms to comply with our ethical obligations, accountability and transparency.

This ensures reliable operation and prevents malpractice. Maintaining accurate information is critical to complying with our legal and regulatory obligations.

We establish a strong internal control system to ensure the reliability of our financial reports and the preparation of external financial statements, in accordance with generally accepted accounting principles, which are audited annually by an independent firm.



# V. Data Protection and Information Security

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## Protection of personal data

We are governed by international and local regulations on the protection of personal data in the locations where we operate.

We recognize that the personal data of our employees, suppliers, customers and third parties is a valuable asset and we consider it confidential and highly sensitive. This data includes any information relating to an identified or identifiable natural person, either directly or indirectly.

At Bocar, we respect the rights of access, rectification, cancellation or opposition (ARCO) of those who have provided us with their data.

We use technology to protect information and grant access permissions only to those who are required to have them.

We ensure the collection of information during the designated period, retaining records of personal data only as long as necessary and disposing of them appropriately at the end of that period.

## Information Security

The threat of cyberattacks is a major risk that we take seriously. We are committed to ensuring the continued operation of our systems and preserving our reputation as a reliable supplier.

Adhering to strict security guidelines and maintaining a strong cyber defense allows us to protect assets, such as data centers and sensitive data, both our own and those of third parties.

We take reasonable steps and establish controls to prevent the loss of information that could expose data in our custody or significantly affect business continuity. We encourage our employees to be aware of the responsible use of technology and the necessary precautions to

Prevent possible attacks on our systems.

## **Use of artificial intelligence**

We recognize the potential of artificial intelligence to improve our products and services.

We are committed to using this technology ethically, ensuring that it is a tool that benefits our customers, collaborators and society in general.

We are open to learning and adopting best practices in the use of AI, to ensure its proper and responsible use in our business context.

## **Social Media**

When our contributors or third parties use social media, they must maintain a professional and respectful conduct in expressing opinions and sharing content on-line.

It is essential to avoid behavior that may damage the reputation of Bocar. We encourage our employees to clearly separate their personal and professional lives on social networks, avoiding publications that may compromise their image or that of the company.

Social networks are not used to share confidential or classified information by Bocar. We urge our contributors to obtain consent before posting content involving other people and to respect copyright and intellectual property rights.

It is expected to share accurate and verified information, avoiding the spread of false or misleading news that may affect trust in our company.



# VI. "Bocar Listens to You" ("Bocar Te escucha")

## Whistleblower Line

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### **Bocar Listens to you** **(Bocar te escucha)**

Our collaborators and third parties have the responsibility to report, genuinely and in good faith, those behaviors that contravene the provisions of this Code. To this end, we make available to you, the "Bocar te Escucha" Whistle-blower Line, which, for quality and confidentiality purposes, is operated by an independent third party, where you have the option of remaining anonymous, to ensure the confidentiality of the reports. If you file a complaint anonymously, please consider that, for the Providing the greatest amount of documentary and contact support to facilitate the process, always keeping the name strictly confidential will help a lot in the investigation process.

When you make your report, you will receive a folio number so you can verify the status of your report or provide additional information.

Keep in mind that all reports made in the whistle-blower line will be sent to the *Compliance* area or the corresponding Ethics Committee, who will be in charge of addressing them in a confidential and timely manner.

We deeply value any good faith report related with practices, behaviors or actions identified within Bocar, which may have the potential to be illegal, improper or non-compliant regulations.





We firmly uphold the Whistleblower Protection policy and do not retaliate against any individual who has filed a report concerning a situation that has been raised sincerely, or in good faith, in relation to non-compliance. This position is maintained, even if the complaint could not be substantiated later.

You can make your report by the following means:



## "Bocar Listens to you"

("Bocar Te escucha")

### Whistleblower Line



Scan the QR  
to make your  
report

Toll-free line, attention  
24 hours, 7 days a  
week.

From Mexico:  
**(800) 880 1729**,  
From United States:  
**1 (833) 827 3530**  
Web page:  
**[bocar.ethicspoint.com](http://bocar.ethicspoint.com)**

## Internal investigations

Once the report is received in "Bocar te Escucha", it will be investigated confidentially by whomever the Ethics Committee designates, a determination will be made, in strict adherence to internal and external regulations, as to whether our Values, Code, policies or applicable laws have been violated.

The investigation will be kept confidential and the results will be reviewed by the Ethics Committee, to establish an appropriate corrective action, based on our system of consequences, in a timely and comprehensive manner.

## Disciplinary consequences or measures

Failure to comply with this Code of Integrity, applicable laws or any policy of our company may have consequences which will be proportionate to the seriousness of the violation, taking into consideration the recidivism and background of the person reported.



Below are the possible disciplinary actions that could be taken in the event of a wrongdoing:

- Verbal or written warning (Administrative Act).
- Additional training.
- Temporary suspension.
- Reduction of variable compensation.
- Termination of the employment relationship (dismissal) or of the professional, commercial or business contract.

It is important to note that the application of these disciplinary consequences is carried out in a fair and equitable manner, and is carried out after a thorough internal investigation and respect for the rights of the person involved.

Disciplinary actions shall be proportionate to the seriousness of the infraction, taking into consideration the intention, the context and the position of the person denounced.

Retaliation or any attempt to prevent, obstruct, or deter individuals interacting with Bocar in their efforts to inform anything they believe is a violation of this Code is also grounds for disciplinary action, including termination.

The *Compliance* area must duly investigate all known violations or complaints received.

## VII. Miscellaneous

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### Do you have any questions about this code?

This Code establishes the minimum principles and values for the conduct of employees and third parties in Bocar. It does not comprehensively address all issues, as certain aspects may have specific policies. It does not create an explicit or implicit employment contract, but employees and third parties are expected to comply with its principles and report any non-compliance.

All policies, including this Code, will be administered in accordance with applicable employment contracts, laws, and agreements.

The policies do not interfere with the legal rights of employees.

In case of doubts, the *Compliance* Area is available for consultation at: ***compliance@bocar.com***.

The Ethics Committee is responsible to resolve any matter not expressly contemplated in the Code.

### Final Amendments and Considerations

The validity of this Code is indefinite, with the understanding that it may be updated derived from the behaviors that need to be strengthened in the organization and based on changes in the national and international legal framework, in view of which, the version published on the website, **www.bocar.com** will prevail.

The Ethics Committee of Bocar is responsible for any update to this Code. Any provision of this Code which may be held to be invalid, illegal, or unenforceable by any law, administrative or judicial authority, in any jurisdiction, shall be ineffective to the extent of that invalidity and in that jurisdiction.

The illegality, unenforceability or invalidity of a particular provision shall not invalidate the other provisions of the Code and in any other jurisdiction so far as permitted by applicable laws.

# Commitment Letter

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I certify that I have received the Bocar Integrity Code, which I have read and understood the ethical standards that guide our daily actions and decisions within the company.

I firmly assume the commitment to ensure their full compliance during the performance of my duties and I recognize that these ethical standards will help strengthen our organizational culture, as well as create a positive work environment; That is why my commitment will be:

1. **Comply** with the provisions of the Code of Integrity in my work activities.
2. **Promote** a culture of integrity and ethics with my coworkers.
3. **Report** any behavior that violates the Code of Integrity.
4. **Do not retaliate** against anyone who expresses concerns.
5. **Train me** to ensure due compliance with ethical standards

My duty is to act in accordance with the principles of integrity contained in this Code, promoting well-being within Bocar at all times.

Name: \_\_\_\_\_

Payroll No.: \_\_\_\_\_

Place and Date: \_\_\_\_\_

Area: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

