

CODE OF ETHICS

VALUES AND PRINCIPLES THAT IDENTIFY US



**GRUPO
ACERERO**



CODE OF ETHICS
GRUPO ACERERO



The **transparency** of
our **actions**

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INTRODUCTION

MESSAGE FROM OUR PRESIDENT

At Grupo Acerero, we are firmly committed to giving our best effort, conducting business professionally, acting in good faith, and upholding at all times the basic principles of ethics, Mexican law, and the regulations issued by our supervisory authorities. These principles of integrity have earned us recognition from our employees, customers, suppliers, and shareholders alike.

The values that guide our work apply to everyone who is part of Grupo Acerero. Acting with strict ethical standards and full respect for the law is a way of conducting ourselves that we must all embrace, and it is reflected throughout this document.

This Code embodies the principles that govern our internal and external relationships with our board members, investors, employees, customers, suppliers, competitors, and authorities. It is a practical working tool that guides us in making sound decisions in alignment with our values.

It is important that everyone who is part of Grupo Acerero read and consult this Code of Ethics on an ongoing basis, and report any irregularities they may observe.

We count on your support, enthusiasm, and commitment to continue building success stories and strengthening the reputation of Grupo Acerero.

Warm regards,

Marcelo Abaroa López

Executive Chairman of the Board of Directors



OBJECTIVES

- To establish the fundamental principles and standards that guide our ethical conduct in our relationships with shareholders, employees, customers, suppliers, authorities, civil society organizations, the environment, the community, and all those who interact with Grupo Acerero.
- To define the responsibilities of board members and company employees in complying with and enforcing this Code of Ethics, which, together with our Corporate Policies, forms part of our Corporate Governance framework.
- To introduce our Whistleblowing System, through which any conduct, violation, or practice that does not conform to the provisions of this Code or our Corporate Policies may be reported.

RANGE

- This Code of Ethics applies to members of the Board of Directors, employees, and all individuals acting on behalf of Grupo Acerero and its subsidiaries.
- This Code is not intended to be exhaustive; therefore, situations not specifically addressed herein shall be resolved in accordance with best practices in management and Corporate Governance.
- Additional matters arising from various business situations or changes in the broader environment will be incorporated as needed.

CULTURE

We have established a Purpose, Vision, and set of Values that chart our path and set the standard for our day-to-day conduct, as well as for the planning of strategies and projects aimed at achieving success, maintaining and strengthening relationships with our stakeholders, consistently generating economic value for our shareholders, and fostering greater social development.



PURPOSE

We help forge a sustainable future for our communities through the sustainable transformation of steel.

VISION

To be recognized for our growth, excellence in service experience, and sustainable practices, achieving lasting value.

VALUES

Our Corporate Culture is centered on principles and values that are part of our identity. Every member of our organization represents a part of the strength we hold as a team; our sense of unity drives productivity, and doing so within a competitive environment motivates us to pursue professional growth.

TEAM SPIRIT

To create and foster empathy among every team member in order to work as one.

INTEGRITY

To be consistent in what we do, what we say, and how we conduct ourselves, without allowing outcomes to affect the interests of others.

PASSION FOR SERVICE

To place the attention to both external and internal customers at the center of our business.

RESPONSIBILITY CUBED

In the social, environmental, and professional spheres.

COMMUNICATE TO BUILD

To be clear and honest, to listen and understand different perspectives, and to express ideas concisely in pursuit of our shared objectives.

PRINCIPLES AND GUIDELINES



1.

OUR PEOPLE

At Grupo Acerero, we implement programs, policies, and procedures that promote ethical conduct. In this regard, we prioritize and place great importance on actions that uphold the respect and integrity of individuals, whether employees or third parties, and their fundamental rights, which are protected under applicable regulations.

1.1 HUMAN RIGHTS

- We demonstrate respectful, diligent, and honest conduct.
- We respect the dignity, freedom, and privacy of all individuals.
- We have zero tolerance for verbal, physical, or visual conduct that undermines dignity and respect.
- We are committed to promoting and maintaining a work environment in which all forms of harassment and/or violence are prohibited and subject to disciplinary action.
- We adhere to the Universal Declaration of Human Rights.

1.1.1 DIVERSITY AND INCLUSION

- We promote the diversity and inclusion of our employees, fostering value within an environment of equal rights and responsibilities.
- We do not discriminate against individuals through distinctions, exclusions, restrictions, or preferences of any kind, including those based on origin, race, marital status, age, opinion, gender, ethnicity, gender identity, sexual orientation, health condition, disability, and/or nationality.

1.2 OCCUPATIONAL HEALTH AND SAFETY

We are committed to carrying out all of our activities in a safe and efficient manner, always prioritizing the well-being of our employees, as well as the mutual benefit of our customers, suppliers, and anyone who interacts directly with Grupo Acerero.

We are responsible for conducting ourselves and carrying out our activities with a constant focus on protecting and safeguarding our own health and personal safety, as well as that of our colleagues, and for reporting through the appropriate channels any potential situation that may put the physical health and safety of personnel at risk.



2.

NATURAL ENVIROMENT



2.1 COMMITMENT TO OUR COMMUNITY

We recognize our commitment to contributing to community development through partnerships with civil society organizations and other entities whose goal is to maximize the social impact of our community initiatives.

2.2 ENVIROMENT

- We recognize the protection and conservation of the environment as part of our social commitment.

- We take the necessary actions to ensure that at Grupo Acerero:
 - a. Effective response procedures are implemented for potential environmental emergencies to minimize the impact of unforeseen incidents or those caused by our operations.
 - b. Significant changes in plants and processes are assessed in advance to prevent adverse environmental impacts.
 - c. Air emissions are reduced and their adverse impact is minimized.
 - d. The use of clean energy sources is promoted, energy is used efficiently, and its consumption is continuously monitored.
 - e. The development of environmentally responsible technologies in our operations is encouraged.
 - f. The efficient use of water is promoted, along with activities that foster its care and conservation.
 - g. Operational growth is ensured with a commitment to reducing environmental impact, through the implementation of programs for the reduction, reuse, and recycling of scrap metal and waste related to our products.
 - h. Information on best practices in environmental care is disseminated.

3.

RESOURCES



3.1 USE OF GRUPO ACERERO'S ASSETS

- We have the responsibility to protect and properly use Grupo Acerero's assets, as well as to seek the best possible use of the resources allocated to us.
- We protect, preserve, and use the company's resources and assets in an efficient and responsible manner, for the benefit of the organization.

3.2 INFORMATION MANAGEMENT

We generate, obtain, process, protect, and preserve information as a company asset, with responsibility and integrity, and in accordance with the laws applicable in the countries where we operate and the systems authorized by management.

3.2.1 PRIVILEGED INFORMATION

We do not disclose and actively prevent the leaking of privileged and confidential information to unauthorized individuals, except for information published through authorized channels.

We do not make any comments or posts to friends, family, or on social media regarding activities and projects carried out within Grupo Acerero.

The official spokespersons of Grupo Acerero are the only individuals authorized to provide information about the company to the media.



3.2.2 ACCOUNTING, FINANCIAL, AND OPERATIONAL RECORDS

We record accounting and financial information in a complete, accurate, and timely manner, in accordance with applicable accounting standards, relevant laws, and securities regulators, ensuring the accuracy of the indicators under our responsibility.

3.2.3 INTELLECTUAL PROPERTY

We do not disclose any type of confidential information, including that related to industrial and intellectual trade secrets, processes, methods, strategies, plans, projects, technical data, market data, or any other kind. We maintain the confidentiality of such information even after our employment relationship with Grupo Acerero has ended.

3.2.4 PERSONAL DATA

We obtain and process personal data responsibly and ethically, and in accordance with the laws applicable in each country where we operate.

3.2.5 INFORMATION TECHNOLOGY SECURITY

We share the responsibility for protecting and preserving the security of information managed through technological resources, as well as the access accounts and passwords assigned to us.

4.

RELATIONSHIP WITH THIRD PARTIES

4.1 CUSTOMERS, SUPPLIERS, COMPETITION, GOVERNMENT, AND AUTHORITIES

We take care in every interaction with third parties — customers, suppliers, competitors, government, and authorities — offering fair and honest treatment in accordance with the principles and values of Grupo Acerero. We promote our Code of Ethics throughout our entire value chain.

Grupo Acerero respects the information of its customers, suppliers, and third parties, and therefore maintains strict confidentiality regarding such information at all times, in full compliance with applicable legislation.

Soliciting or receiving any type of incentive that could influence judgment in relationships with customers or suppliers is strictly prohibited.

We conduct business fairly, based on our ethical principles and in compliance with competition laws in the countries where we operate.

Those of us who have contact with representatives of competitors maintain a professional attitude, aligned with the principles and values of the company we represent, and uphold both our personal image and that of Grupo Acerero.

In interactions with competitors, whether individually or in business and professional forums and associations, we do not discuss topics that could generate risks or potential liabilities for Grupo Acerero.

We cooperate at all times with the government and competent authorities in the full exercise of their powers, and act lawfully in defense of the interests of Grupo Acerero.



5.

TRANSPARENCY



We are committed to a culture of transparency as a driver of trust and development. Our practices are designed to ensure compliance with all applicable laws and regulations, including those related to the prevention of corruption, bribery, money laundering, and political contributions.

5.1 REGULATORY COMPLIANCE

We comply with the laws, regulations, and legal requirements of the places where we operate, as well as with this Code of Ethics and the policies, standards, and procedures established by Grupo Acerero's Management.

5.2 ANTI-CORRUPTION

We carry out business practices in accordance with the law, honestly and ethically, with zero tolerance for bribery, rejecting and combating any act of corruption.

In our activities within or outside of Grupo Acerero, or on its behalf, whether directly or through a third party, we do not engage in acts of corruption. Therefore:

- a.** We do not order, authorize, or promise the execution of corrupt practices.
- b.** We do not induce any person to engage in corrupt practices.
- c.** We do not conspire in the carrying out of such practices.
- d.** We do not engage with individuals or organizations that practice corruption of any kind.

5.2.1 ANTI-BRIBERY

We are committed to maintaining zero tolerance for bribery across all of our operations.

Any employee, supplier, or business partner who engages in bribery practices will be subject to disciplinary measures, including termination of contract and possible legal action.

5.3 ANTI-MONEY LAUNDERING

We comply with applicable laws for the prevention of money laundering, and promote awareness and adherence to these laws among our employees.

5.4 POLITICAL CONTRIBUTIONS

Grupo Acerero has no political affiliation or orientation. Employees may participate in political activities of any kind, provided that such participation does not involve or implicate Grupo Acerero, and that it is made explicitly clear that they are acting in a personal capacity and not as representatives of the company.

5.5 CONFLICT OF INTEREST

At Grupo Acerero, we carry out all of our activities with integrity and professional ethics, always seeking the benefit of Grupo Acerero and not personal gain, whether directly or indirectly.

We are required to report through authorized channels any situation that may represent a conflict of interest.



5.5.1 FINANCIAL INTERESTS

Employees who hold full or partial ownership in companies that have any commercial relationship with Grupo Acerero must disclose such conflict of interest for review and approval in accordance with Grupo Acerero's Corporate Policies.

No employee may hold interests, shares, or investments in competing businesses that would allow them to exert influence over commercial activities.

5.5.2 FAMILY AND OTHERS

We do not participate in or influence, directly or indirectly, any requirements, negotiations, hiring processes, or decision-making processes regarding any customer, supplier, and/or business partner, if with any of them, or within any of them:

- a.** We have a family relationship.
- b.** We have a family member who is a partner, investor, or representative.
- c.** We have a relationship (including personal friendship) that could give rise to a conflict with the interests of Grupo Acerero or a personal benefit, including if that relationship is with a partner, investor, or representative of said customer, supplier, or business partner.

No employee may have a direct or indirect reporting relationship with family or romantic partners, except in cases authorized under our Corporate Policies.

Those of us who perform oversight, supervision, audit, or control functions over an area managed by a family member must inform our superior in order to be relieved of that responsibility. In the case of the Chief Executive Officer of Grupo Acerero, this must be reported to the Board of Directors.

5.5.3 GIFTS, TRIPS, AND HOSPITALITY

We do not receive, give, pay, offer, promise, or authorize on behalf of Grupo Acerero or in a personal capacity, whether directly or indirectly, money, salaries, commissions, or any other monetary compensation in order to obtain any undue advantage or benefit of any kind.

We only accept, give, or offer gifts that are promotional, occasional, and of symbolic value. Likewise, the use of prudence and transparency is strongly encouraged when receiving or providing legitimate items that could potentially be used to facilitate acts of corruption.

When a customer or supplier extends an invitation that involves traveling outside the city or attending a sporting event or any other form of entertainment, it must strictly serve a purpose that benefits

Grupo Acerero, and must be reported to the appropriate senior management level in order to justify the purpose of attendance.

5.5.4 OTHER ACTIVITIES

We do not intercede on behalf of or fulfill requests from superiors, subordinates, coworkers, family, or friends if doing so would be detrimental to Grupo Acerero.

We do not engage in any external activity that could affect our capacity or availability to fulfill our obligations to Grupo Acerero.



6.

RESPONSIBILITIES UNDER THE CODE



We are committed to a culture of compliance by fulfilling our responsibilities under this Code:

- **COMPLY:**
With the established guidelines.
- **OBSERVE:**
Adherence to regulatory requirements.
- **REPORT:**
Any compliance deviation through our communication channels.

ETHICS HOTLINE
GRUPO ACERERO

www://etica.resguarda.com/grupoacerero



+52 55 8526 1700



etica.grupoacerero@resguarda.com



800 123 3312 / 800 444 0597



LETTER OF ADHERENCE TO GRUPO ACERERO'S CODE OF ETHICS

I hereby confirm that I have been informed and trained on the current Code of Ethics of the company, and that I am aware of both its digital and printed versions for reference whenever needed.

I reaffirm my commitment to observing the guidelines established in this Code of Ethics, promoting them, and reporting any deviation that may arise within the organization with respect to this Code.

Conflict of interest declaration

I commit to avoiding any situation that could represent a conflict of interest between my professional responsibilities and my personal interests. I acknowledge that a conflict of interest may arise when my personal, family, or financial interests interfere, or may interfere, with my ability to perform my duties objectively and effectively at Grupo Acerero.

By signing this letter, I confirm that I have read and understood the Code of Ethics of Grupo Acerero and that I agree to adhere to its principles and guidelines in all of my professional actions and decisions.

Sincerely,

San Luis Potosí, SLP. México _____ of _____ 20____
Day Month Year

Full Name

Area and Work Center

I have a conflict to declare [YES] [NO]

Description: _____

Signature





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GRUPO ACERERO

2026