

BUSINESS ETHICS POLICY

Blue Energy and Electricity, SAPI de CV and subsidiaries (hereinafter, "Blue Energy" or "the Company"), through this Business Ethics Policy, recognizes the importance of establishing guidelines that regulate the behavior of all individuals who are related to its business operations. Although ethics is not coercive (it does not impose legal punishments), this policy will represent a mandatory internal regulation, which can lead to the application of administrative sanctions in possible legal terms.

The policy is the instrument that brings together the rules established within the Company, with the purpose of guiding the personal and professional conduct both at the individual and organizational level, of those who work or are related to it, towards the fulfillment of ethical duties.

At Blue Energy we firmly believe in the defense of the rules of ethical behavior, and we intend that each and every one of those who establish formal business relationships, develop their activities in such a way that they comply with a series of principles based on transparency, honesty and fairness.

Objective

- To constitute a concise and unified guide for all the operations of the Company, with respect to what we believe business ethics should be, and the practice of this as the only acceptable behavior.
- To provide guidelines that contribute to the adoption of ethics in the day-to-day operation of our business and its various activities.
- Motivate stakeholders to build, maintain, and promote the highest standards of ethical behavior in their internal and external interactions.
- Contribute to the achievement of the Company's vision, mission and values.

Scope

These guidelines of conduct reflect the responsibilities that must be fulfilled within the Company in relation to employees, shareholders, suppliers, customers, government entities and the community in general (hereinafter, "Stakeholders"), in order to promote the development of relationships of mutual trust.

To this end, stakeholders must sign a declaration of adherence to this Policy at the beginning of the relationship that unites them to Blue Energy, and it must be renewed annually.

Responsibilities

At Blue Energy, we are committed to conducting our business with integrity. Our [Business Ethics Policy](#) supports our values and commitment to responsible business practices, and prohibits unacceptable actions such as illegality, corruption, conflict of interest, anti-competitive practices, and information insecurity, among others.

Our [Code of Ethics](#) disseminates the guidelines of conduct of those who interact in this Company, based on good being and good doing, respect for human rights, self-regulation, legality and transparency that together make up a model to follow.

This Policy is not intended to create barriers or limit business. Blue Energy strongly believes that complying with this Policy contributes to safeguarding and promoting the Company's business success.

Commitments

- a) By 2026, 100% of the business relationships established with the different stakeholders must have the certificate of knowledge of the Code of Ethics and adherence to this Policy, and the Ethics Committee will ensure that the stakeholders understand the content of these documents.

- b) In conjunction with the previous point, 100% of the stakeholders with which Blue Energy relates must have filled out the [Business Ethics Self-Assessment form](#), the results of which will be analyzed by the Ethics Committee in conjunction with the Company's Management to make decisions that contribute to reinforcing ethical compliance.
- c) By 2026, the Ethics Committee will exercise the mechanism of internal review of 100% of files that formalize the relationship with stakeholders, to avoid incurring in ethically prohibited actions: conflicts of interest, undignified or hostile conduct, misuse of privileged information, among others.

Violation of the provisions of this Policy could result in criminal offenses, have administrative, labor or disciplinary consequences, according to the regulations applicable to the relationship that unites the Company with the interest group in question, and may lead to the filing of claims or reparation of damages as required by Blue Energy.

Tracking

The Ethics Committee is Blue Energy's internal body that will be responsible for monitoring and applying this Policy and its related Code among stakeholders.

The officers who make up said Committee must be members of the group of employees of the Company, and must interact with the related stakeholders.

Validity and revision

The contents of this policy will have an indefinite term or until the Company so decides. Its dissemination will be carried out through induction of new hires, training, signing of contracts and/or renewals, and will be published for consultation on the Company's website.

It will be updated when the Policy requires it, which will be in charge of the Legal Coordination and the Systems Coordination.