



Department:

Customer Experience Management / Continuous Improvement and Quality coordination

Subject:

Code of ethics and anti-corruption policy

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APPLICATION

The behavior of the employee working at PROESA ELECTRONICA, S.A. DE C.V has a significant impact within the company and the community during the performance of their activities. Therefore, it is important that they conduct their work and behavior responsibly and based on ethical principles to achieve and maintain trust with company members, clients, business partners, public administrations, and the community.

1.0 REFERENCES

- Proesa electrónica quality manual
- Internal work regulations
- Proesa electrónica values
- ISO 37001:2016 (anti-bribery management system standards)
- Federal law for the prevention and identification of operations with illicit resources
- General law of the national anti-corruption system
- Federal law on the protection of personal data held by private parties
- Mexican federal penal code
- General law to prevent, punish and eradicate crimes in matters of human trafficking and to protect and assist victims of these crimes.
- Political constitution of the United Mexican States
- PR-RSE-01_Procedure for handling suggestions, complaints, or reports

2.0 SCOPE

This code and policy cover the behavior of personnel working in the Company during the performance or their activities and duties, both with coworkers and with clients. Suppliers, and the community.





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3.0 RESPONSIBILITIES

The employees of Proesa electrónica Must ensure that their behavior in each of their actions is aligned with this Code of Ethics and Anti-Corruption Policy and must support its enforcement among all members of the company.

Directors/Deputy directors, managers, and coordinators: They are responsible for ensuring compliance with this Code of Ethics and Anti-Corruption Policy.

Top management: Is responsible for deciding what actions to take regarding gifts or benefits received from clients, suppliers, distributors, or any other entities not mentioned herein.

Procurement management: Is responsible for safeguarding gifts and presents.

Continuous improvement and quality coordination: Is responsible for verifying that this Code and Anti-Corruption Policy is properly followed.

Honor and justice committee It is responsible for addressing reports related to violations of the Code of Ethics and Anti-Corruption Policy.

4.0 PROCEDURE DESCRIPCION

4.1 DEFINITIONS

The following definitions shall apply within this procedure:

Employee Any person working for Proesa Electrónica S.A. de C.V., regardless of their position or responsibilities.

Company Refers to Proesa Electrónica S.A. de C.V.

Coworker Any person working within the Company alongside the Employee.

Colleague Any person performing a similar job, regardless of the company for which they work.

Client A natural or legal person who contracts the Company's services.

Supplier A company or individual who provides goods or services for the Company's operations.

Bribery The act of offering money or items of value to a person to obtain a favor or benefit, especially if it is unfair or illegal, or to cause them to fail to fulfill a certain obligation. It also refers to corrupting someone through money, gifts, or favors in order to obtain something from that person.

Corruption The act of corrupting or being corrupted.

Collusion An agreement between two or more parties to limit competition. This is done secretly or illegally, deceiving others about their legal rights, either to achieve a goal prohibited by law or to gain an unfair advantage in the market.

4.2 ANTI-CORRUPTION POLICY

Our Anti-Corruption Policy aims to ensure that no bribes or corrupt acts are offered, received, or solicited by anyone acting on behalf of Proesa Electrónica.



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At Proesa Electrónica, we seek to promote an ethical organizational culture by encouraging employees to stay away from the following corrupt practices, both within the company and in their daily lives:

- a. Bribery
- b. Money laundering
- C. Trafficking and use narcotics.
- d. Illegal use or false confidential information
- e. Collusion
- f. Obstruction justice
- g. Smuggling
- h. Slavery and human trafficking
- i. Embezzlement of funds and Misappropriation of resources
- j. Abuse of authority/functions
- k. Any act or practice that infringes upon human rights

4.2.1 Bribery

At Proesa electrónica it is strictly prohibited to give or offer money, services, or other items of value to persuade a person to do something in return. Bribery is considered a crime under both national and international laws.

Bribes may also be referred to as kickbacks, payoffs, hush money, protection fees, gratuities, among others.

4.2.2 Money laundering

At Proesa electrónica, we are obligated to prevent any criminal actions or concealment related to disguising the origin of resources derived from illicit or criminal activities such as drug trafficking, all types of smuggling, fraud, extortion, piracy, among others.

Money laundering is also known as "cleaning" or "whitening" of money, as illegally sourced funds are processed through legal channels to make them appear legitimate.

Money laundering is an international crime; therefore, any person involved in such activity will be reported to the appropriate authorities.

4.2.3 Trafficking and use or narcotics.

In accordance with Mexican legislation and committed to strong ethical principles, Proesa electrónica strictly prohibits any member of the company from consuming or trafficking narcotics.

4.2.4 Unlawful/illegal use false or confidential information

The intentional and deliberate use of false information to deceive, mislead, manipulate personal decisions, discredit or exalt an institution, entity, or individual, or to obtain personal



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or economic gain, is strictly prohibited at Proesa electrónica. This also includes presenting false information as if it were true.

As an employee, member, or contracted service provider of Proesa Electrónica, you are irrevocably obligated to maintain strict confidentiality regarding information related to the performance of your duties. Therefore, under no circumstances and at no time may you disclose, reveal, use, dispose of, copy, share, reproduce, or transmit such information by any means to third parties or to the public, nor may you allow anyone else to do so. Likewise, you may not summarize, modify, or alter such information in any way, or use it for commercial or unauthorized purposes without the prior written consent of the company.

4.2.5 Collusion

At Proesa Electrónica, it is strictly prohibited to secretly conspire to raise prices or lower the quality of goods or services offered to buyers seeking to acquire products or services from the company. It is also forbidden to engage in secret agreements or conspiracies between two or more individuals with the intent to defraud or harm others (colleagues, suppliers, clients, coworkers, or superiors).

4.2.6 Obstruction of justice

As an employee, member, or contracted service provider of Proesa Electrónica, any willful conduct that obstructs the proper functioning of the administration of justice or harms others is strictly prohibited.

4.2.7 Smuggling

As an employee, member, or contracted service provider of Proesa Electrónica, participation in the unauthorized entry, exit, or clandestine sale of goods of illicit origin, prohibited items, or goods subject to customs duties with the intent to defraud authorities is strictly prohibited.

4.2.8 Slavery and human trafficking

In the United Mexican States, slavery is prohibited. Therefore, all employees or members of the Company are urged to avoid any willful action or omission aimed at recruiting, luring, transporting, transferring, retaining, delivering, receiving, or harboring one or more persons for the purposes of labor exploitation, slavery, sexual exploitation, or other related crimes. Likewise, clients and suppliers must be informed that the Company will not accept any professional or personal relationship with individuals or entities that commit or promote such crimes.

4.2.9 Embezzlement of funds and Misappropriation of resources

At Proesa Electrónica it is strictly prohibited to use company resources (financial, technological, or material) without authorization for personal or third-party benefit.



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4.2.10 Abuse of authority or functions

- a. When a person causes funds, valuables, or other items that were not entrusted to them to be delivered and then appropriates or misuses them.
- b. When a person obtains, demands, or requests, without any legal right or legitimate cause for themselves or for another person part of the salary or remuneration of one or more subordinates, gifts, or other goods or services.
- c. When a person unjustifiably delays or prevents a subordinate from submitting or processing a request (such as for leave, vacation, complaints, or grievances).

4.3 PERSONAL CONDUCT

In all activities, employees must conduct themselves with a high level of integrity, and for that purpose they must:

- a) Maintain behavior within the Company that reflects the responsibilities of their position.
- b) Accept responsibility for their actions.
- c) Perform and/or accept only those tasks for which they are truly qualified.
- d) Maintain an open and collaborative attitude toward their coworkers.
- e) Comply with the laws and regulations applicable to the location where the work is performed.
- f) Respect, support, and uphold the contents of this "Code of Ethics and Anti-Corruption Policy."

4.3.1 Professionalism at work

- a) In relationships with coworkers and clients, the employee must:
Treat all coworkers fairly, protecting them from physical and mental harm, providing appropriate working conditions, and offering opportunities for professional development.
- b) Act in the best interest of the Company in matters concerning it, with complete independence, without accepting any internal or external influence that may affect their work.
- c) Apply cutting-edge techniques as needed to ensure the fulfillment of the Company's objectives for the client.
- d) Employees are obligated to treat as confidential all internal matters that have not been approved for public disclosure. The communication of internal confidential information (e.g., business strategies, research results, or contents of internal financial, accounting, or administrative reports) to unauthorized personnel inside or outside of Proesa electrónica is strictly prohibited.

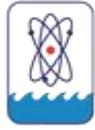
If the job requires disclosing confidential information to third parties, specific approval from the immediate supervisor is required, and a confidentiality agreement signed by the third party receiving the confidential information must be considered. Employees who, by virtue of their position at Proesa Electrónica have access to confidential information must not use such information for personal benefit.

- e) Do not accept commissions or any form of compensation other than those agreed upon with the client by the Company.



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- f) Respect fair competition, without attempting to displace another colleague through influence or improper actions.
- g) Be open to honest criticism of work performed.

4.3.2 Relationships with management and clients

In relation to clients, employees must:

- a) Defend and promote the contents of this "Code of Ethics and Anti-Corruption Policy."
- b) Refrain from disparaging the Company, coworkers, and colleagues.
- c) Promote the corporate image of loyal employees who uphold confidentiality.
- d) Inform clients if any circumstance arises that may lead to a conflict of interest.
- e) Avoid situations that could result in a conflict between personal interests and those of Proesa electrónica. During contracts with current and potential clients, suppliers, and competitors, employees must act in the best interest of Proesa Electrónica, setting aside any personal advantage. In case of a potential conflict of interest, employees must inform their immediate supervisor and await Proesa's decision on how to proceed.
- f) Be honest in dealings with others, complying with all applicable laws and regulations governing fraud, bribery, and corruption, while avoiding any situation that could place Proesa electrónica at legal risk or harm its relationship with clients and reputation. To this end, no Proesa electrónica employee may, during business activities, directly or indirectly demand, accept, offer, or grant incentives or rewards that could be considered unethical. This applies to individuals, companies, and public institutions.

On a personal level, no incentive of any kind may be offered or granted to any public official, locally or abroad. This applies to all types of favors, benefits, gifts, payments, or other considerations. The only recognized exception is customary, occasional, or promotional gifts of low value intended to maintain local customs. Hospitality and other favors are also permitted as long as they are legally permissible and of verifiable low value, in order to avoid any suspicion of influence in business decisions.

If you observe conduct that may be unethical or illegal, you are encouraged to report your concerns in the mailbox of suggestions, complaints, or reports.

No retaliation Will be tolerated against any employee who honestly reports a concern to top management regarding any ilegal or unerthical conduct.

4.3.3 Responsibility to the community

In their relationship with the community, employees must:

- a) Protect the safety and well-being of the Company by alerting clients to any possible abuses in areas affecting assigned work, with special care given to environmental protection and safety regulations throughout all phases of their work.
- b) Report to the Company any irregularities observed in the conduct of a coworker, using the appropriate channels.



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c) Comply with applicable laws and regulations in any location where the Company conducts business. Pressure from supervisors or business conditions demanded by clients do not justify violating the law.

4.4 CODE OF CONDUCT FOR THE APPROPRIATE USE OF DIGITAL TECHNOLOGIES

At Proesa Electrónica we are committed to promoting the responsible, safe, and ethical use of technology. This code sets out principles and guidelines to guide employee behavior in digital environments, encouraging respect, privacy, and integrity.

4.4.1 Netiquette (Respect and digital dignity)

- Treat all users with courtesy and consideration.
- Avoid any form of harassment, discrimination, or hate speech online or through any company communication channels.
- Promote and maintain an inclusive and safe digital environment.

4.4.2 Privacy and data protection

- Respect the confidentiality of personal information unrelated to the company.
- Do not publish or share sensitive data without the explicit consent of the parties or stakeholders involved.
- Use security measures (such as encryption and authentication) to protect critical information.
- Respect others' privacy when sending or forwarding emails by ensuring that the information shared is appropriate.

4.4.3 Transparency and honesty

- Do not spread false or misleading information (fake news, deepfakes).
- Clearly identify sponsored or advertising content.
- Give credit to sources and authors when sharing third-party content.

4.4.4 Security and responsibility

- Do not participate in malicious activities (hacking, phishing, fraud).
- Report security vulnerabilities responsibly to the appropriate department.
- Keep systems and software up to date to prevent risks.

4.4.5 Intellectual property

- Respect copyright and software licensing rights.
- Avoid plagiarism and the unauthorized use of protected content.
- Promote the use of open-source resources whenever possible.

4.4.6 Balanced use of technology

- Encourage healthy and mindful digital consumption.
- Avoid addiction to social media, video games, or other platforms.
- Promote digital disconnection for mental well-being.



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4.5 HANDLING OF SUGGESTIONS, COMPLAINTS, OR REPORTS

Proesa Electrónica provides a mechanism for submitting suggestions, complaints, or reports in order to address any violations of the Code of Ethics and Anti-Corruption Policy, as well as any illegal acts or actions that may infringe on human rights. This mechanism is available on the company's website, or through the phone number 93838444633, directed to the Customer Experience Management, or via email at: cxm@proesaelectronica.com

Proesa electrónica personnel involved in the handling of suggestions, complaints, or reports must act with ethics, transparency, legitimacy, and impartiality, ensuring the confidentiality of the information and the privacy of the user's data. It is also essential to guarantee that there will be no retaliation against any parties involved, whether individuals, companies, or institutions.

For more information, please refer to document PR-RSE-01 Procedure for handling suggestions, complaints, or reports, available on the company intranet or upon request via email at: calidad@proesaelectronica.com

4.6 GIFTS AND HOSPITALITY

It is Proesa electrónica policy not to offer or accept gifts; however, the exchange of low-value items is supported.

Promotional items such as pens, mugs, or calendars may be exchanged to foster relationships and promote Proesa Electrónica.

Hospitality is only acceptable if it is approved by Proesa Electrónica top management and occurs in the context of a business meeting. It is not permitted when it involves public officials and must not occur frequently or during bidding or contracting processes.

All gifts received, given, and/or declined must be recorded in the gift register, managed by the continuous improvement and quality coordinator, who will report the gifts and their status to top Management.

Gifts received will be kept in the Procurement Management Department.

5.0 DOCUMENT CONTROL

For this code, a gift report must be generated, and records must be kept for 2 years.



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