

CODE OF ETHICS AND CONDUCT



January 2024



Grupo
PROMAX

Index

1. Introduction	04
1.1 Message from Directors	04
1.2 Introduction to Grupo PROMAX	06
1.3 MAXIMO Values	07
2. Grupo PROMAX Collaborators	09
2.1 Respect for Work Culture	09
2.2 Human Rights	10
2.3 Diversity and Inclusion	10
2.4 Health, Safety and Hygiene	11
2.5 Community and Civic Engagement	12
2.6 Employee Engagement	13
3. Business Partners and Relationship Groups	15
3.1 Best Business Practices	15
3.2 Gifts, Invitations, Hospitality or Other Courtesies	16
3.3 Conflicts of Interest	17
3.4 Zero Tolerance for Corruption, Bribery and Money Laundering	18
3.5 Environmental and Social Responsibility	19
4. Heritage and Security	20
4.1 Use of Confidential Information	20
4.2 Accounting and Recording	21
4.3 Protection and Proper Use of Company Assets	23
5. Ethics Program	25
5.1 Ethics Complaints	25
5.2 Reports	26

Grupo PROMAX.- For the purposes of this document, Grupo PROMAX means any company or individual that directly or indirectly controls its operations (including directors and officers).

Message from Directors

The values and ethics of Grupo PROMAX, are the fundamental pillar of all our business actions in each of the industries, countries, and different cultures where we interact.

Throughout the Group's trajectory, living ethically has been the key to the driving force behind our continued progress, which is an internal benchmark with our collaborators and our external stakeholders. By constantly growing and expanding, only through trust, values, common goals, and ethics will we be able to maintain our essence and identity.

In our companies, we want employees to develop both professionally and humanly and act ethically, gaining the trust of customers, suppliers and other relationship groups and getting involved in their social and environmental environment. For this reason, we are focused on growing together with our environment and stakeholders, demanding ethics, respecting human rights, taking care of our collaborators, the environment and the environment that surrounds us.

The "Code of Ethics and Conduct of Grupo PROMAX", was developed with a global approach, respecting each of the countries and cultures where we work, not only limiting what is indicated by local laws, but also representing global citizenship according to the internal regulations for Grupo PROMAX.

We invite all our collaborators, customers, suppliers, investors, community and any group or individual that has a relationship with Grupo PROMAX, to live our Code and be consistent with it in their daily actions.

Ethics and Integrity are the basis of our success and the engine that will continue to give life to Grupo PROMAX in the future.

General Direction



Introduction to Grupo PROMAX

Grupo PROMAX, is a private business group of Mexican origin with an international presence, diversified in the production and marketing of plaster, drywall, light construction materials, as well as zinc derivatives and recycled paper.

We are present internationally with operations in Mexico, the United States, Turkey, Colombia, Germany and with business partners around the world.



MAXIMO Values

Our organizational values are of the utmost relevance, as they are the maximum guide for each employee of Grupo PROMAX, to act and reflect our words, actions and decisions in any business relationship.





INTEGRITY: We always do the right thing, for the right reasons, in the right way.



HUMILITY: We handle ourselves with a personal profile of simplicity and modesty, showing an optimal awareness about the use of resources.



CUSTOMER FOCUS: We put our internal and external customers at the center, we understand and look after their needs to offer them personalized experiences that exceed their expectations.



EXCELLENCE: We work to be better every day and to be the best in everything we do.



COLLABORATION: We work as a team and actively participate with everyone, offering valued contributions.



OPENNESS TO CHANGE: We are open to giving and receiving feedback to grow as people and professionals, we are agile to learn and to adapt to changes.



INNOVATION: We seek and implement new ways of working to be at the forefront of both our processes and products.

2. Grupo PROMAX Collaborators

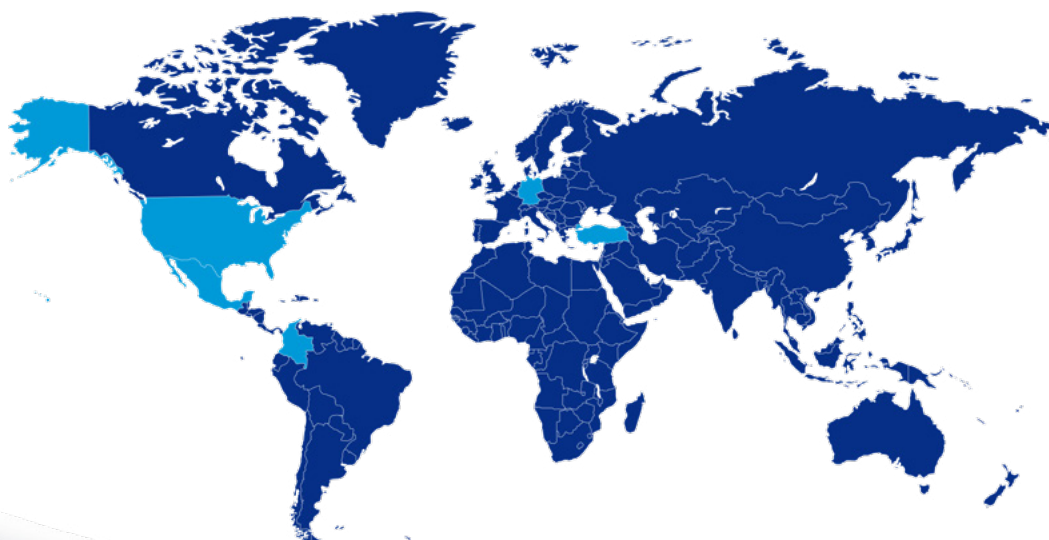
2.1 Respect for Work Culture

Our main value is collaboration; We seek that everyone has the opportunity to develop their potential to the fullest so that each person is contributing to the development of Grupo PROMAX.

In Grupo PROMAX:

- We treat each other with respect and dignity; We foster an environment of camaraderie, open communication, and trust.
- We provide equal opportunities based on performance and adherence to the MAXIMUM Values, based on meritocracy.
- We promote feedback with our collaborators in search of continuous improvement.
- We discourage favoritism, which means giving work benefits to a collaborator in a differentiated way.
- We respect the right of each person to achieve a professional and personal balance of life.
- We take care of the personal integrity of our collaborators.
- We value the work of employees in a fair way, based on their contribution to results.
- We provide professional and personal development opportunities to our employees to reach their full potential.
- We respect and promote individual and collective ideas of value.
- We respect the privacy and personal data of our employees and only obtain and retain personal information that is necessary for the operation of the company or as required by applicable local law.

At Grupo PROMAX we adhere to all laws, regulations, and regulations applicable in each of the countries in which we work.





2.2 Human Rights

At Grupo PROMAX our Ethics and Integrity adhere to the universal principles of Human Rights found in the International Bill of Human Rights and the Declaration of the International Labor Organization, which is why we are committed to respecting and protecting the fundamental rights of our employees and relationship groups.

We do not allow forced and child labor, we promote fair labor practices and a work environment that provides comprehensive well-being to employees, as well as we respect the freedom of collective association.

2.3 Diversity and Inclusion

We are committed to providing equal opportunities in all aspects of work and to all employees and applicants. Promoting a culture of inclusion, where there is no form of discrimination and respecting sexual preferences, religion, gender, race, ethnic origin, age, nationality, academic level, political leanings, physical appearance, marital status, disability, or any individual difference, having zero tolerance for acts of discrimination.

We have a diverse workforce across our operations, providing an inclusive, safe and productive work environment for all.

2.4 Health, Safety and Hygiene

At Grupo PROMAX we are committed to providing a safe and healthy work environment, providing optimal conditions in the common facilities to employees, customers, visitors, contractors and suppliers.

We comply with all health and safety laws and regulations applicable to the legislation of each country where we operate.

We design, build, maintain and operate facilities that protect our people and our physical resources, as well as internal programs that seek the comprehensive well-being of our employees.

For Grupo PROMAX, health, hygiene and safety are a priority, so the use of equipment with the appropriate protection measures is essential. In the same way, we accept safety recommendations and encourage safe and responsible work through training; making work teams and collaborators responsible for complying with policies and procedures.

We have a workplace free from violence, threats, abuse and intimidation, in accordance with our standards of zero tolerance for violence.

We offer products that are free of risk to the safety, health, and lives of our consumers, ensuring that they do not harm the environment.





2.5 Community and Civic Engagement

At Grupo PROMAX, we believe in the importance of citizenship, which is why we encourage employees to get actively involved with the social environment and encourage civic participation. We know that, as individuals, we have a great social and personal responsibility to contribute to the development of society. Therefore, we encourage employees? (Not sure what you mean when you use this term. Used in other places as well in document, to get involved, participate, and collaborate with the social and civic environment.

Since we promote civic, ethical, and social values, we are not involved in political movements and/or decisions. Decisions to contribute time, money, or resources to any community or civic activity are entirely personal, non-partisan, and voluntary.

2.6 Employee Engagement

At Grupo PROMAX we expect employees to comply with the following:

- Know the Mission of the company(s) to which it is provided and contribute to its achievement through the practice of the MAXIMUM Values and compliance with the provisions of the Code of Ethics and Conduct.
- Know, understand, comply with, and enforce the policies, guidelines and internal regulations of Grupo PROMAX, under the applicable regulations in force in the country where they are working.
- Dedicate their talent and best effort to the company by acting with high professionalism, encouraging collaboration and teamwork, as well as offering value contributions.
- Fulfill their responsibilities and development goals consistently, honestly, and responsibly.
- Be in constant self-development, taking advantage of the opportunities and various means of learning provided by Grupo PROMAX.



- To project the company's image inside and outside its facilities by good example.
- To act in favor of the PROMAX Community in its health and safety, its social environment, and the environment.
- Promote and enforce the values and principles of the Grupo PROMAX's Code of Ethics and Conduct to their colleagues and other relationship groups.
- Report any occurrence that is suspected or appears to violate the Code of Ethics and Conduct, Policies and Regulations and/or applicable laws.



3. Business Partners and Relationship

3.1 Best Business Practices

Within our business environment with customers, suppliers, and competitors, it is essential for us to maintain free competition, as well as the applicable legal and regulatory framework. Accordingly, we recognize and abide by laws prohibiting trade restrictions, abusive economic activities, and unfair or unethical business practices. So, we speak out against monopolies, unfair competition, illegal business, price controls and simulation of operations.



In all our business operations with suppliers, customers, shareholders, and any other stakeholder, Grupo PROMAX will:

- Compete vigorously, fairly, and with integrity.
- Treat all customers and suppliers fairly, honestly, and objectively.
- Avoid unfair or deceptive practices and always present services and products in an honest and straightforward manner.
- Never make unnecessary or unsubstantiated comments about a competitor's product.
- Select suppliers solely on their merits.
- Request employees who negotiate on behalf of the company to report any relevant information about intentions or facts of unfair business practices to third parties.
- Know and comply with the Code of Ethics and Conduct.

3.2 Gifts, Invitations, Hospitality or Other Courtesies

The company's decisions are based on merit; Therefore, we never give or offer, directly or indirectly, anything of value to government representatives or other relationship groups that may influence a discretionary decision and lead to any act of corruption, bribery and/or unfair business practices.

Giving Gifts, Invitations, Hospitality or Other Courtesies:

It is strictly forbidden to give to government officials and/or personnel.

If it is deemed appropriate and correct to give a gift to an external party or a relationship group, it must be authorized by the General Management and subject to the provisions of the Grupo PROMAX's Corporate Gifts and Hospitality Policy.



Accepting Gifts, Invitations, Hospitality or Other Courtesies:

It is strictly forbidden to accept on a personal basis any gifts, favors, loans, payments, services, or special treatment of any kind from any person or organization that conducts or attempts to do business with the company, or that competes with us.

In case the employee receives (for extraordinary reasons) a gift from business partners or business relationships, it must be reported to the immediate supervisor and the Human Capital department as soon as it is received, so that they can define its destination.

Any case of this nature should be consulted in the Grupo PROMAX's Corporate Gifts and Hospitality Policy.



3.3 Conflicts of Interest

A conflict of interest is when the personal, social, economic or political interests of an employee influence (or appear to influence) the loyalty of the Grupo PROMAX employee or his or her ability to carry out his or her duties objectively and disinterestedly for Grupo PROMAX.

It is forbidden for commercial activities on behalf of any of our businesses to be influenced, or appear to be, influenced by personal or family interests, as well as to compete among Grupo PROMAX's businesses.

All actual, apparent, and/or potential conflicts of interest in personal and professional relationships must be treated honestly and ethically. If any may be presented, it is mandatory for the collaborator to declare it in the established annual process. In the event of a conflict of interest, the collaborator must abide by the following principles of action: avoid, withdraw, reject, and declare it.

Here are some examples of conflicts of interest that should be reported and resolved:

- Existence of family interests in any transaction with the company. Family interests include partner, parents, children, siblings, in-laws, or people with whom the collaborator lives.
- Existence of more than one nominal family or individual interest in a competitor, supplier, or customer of the company (e.g., owning more than 1% of a supplier's shares).
- Existence of significant individual or family interests in an organization that conducts or attempts to conduct business with the company.
- Acquisition of property rights at the individual or family level (such as real estate, patent rights, securities, or other assets) or of businesses in which, in the opinion of the employee, the company may have an interest.
- Existence of business activities or interests with organizations that conduct business with the company.
- Existence of external business activities or interests that affect the employee's performance at work due to the time and attention that must be devoted to them.

3.4 Zero Tolerance for Corruption, Bribery and Money Laundering

At Grupo PROMAX we have zero tolerance for corruption, bribery, money laundering, fraud and/or any form of violation of the Law due to its great effects on the company, the person and the development of the country, which, by way of example but not limitation, are defined as follows:



Corruption and/or Bribery. It is any practice of giving and/or receiving something of value in order to induce another person to fail or omit their legal or ethical responsibilities.



Money Laundering and/or Fraud. It is the fraudulent practice of obtaining money or property by means of deception and false documentation or statements, Unlawful appropriation of valuable property for personal gain.

We speak out against any illegal act, reminding employees that it is their responsibility to report any suspicion that may cause harm.





3.5 Environmental and Social Responsibility

At Grupo PROMAX we are fully committed to caring for the environment, and strengthening and developing society as a company that promotes sustainability.

We have programs and processes that promote recycling, water care, air pollution prevention, as well as efficient use of energy.



We make efficient and responsible use of natural resources. We also manage all wastes properly and take efforts to reduce non-biodegradable wastes which can have negative impacts on the environment.

We promote environmentally friendly products and services, transferring this culture internally and to our value chain.

We contribute to the integral development of our communities, by strategically choosing our social investment in support of projects, thus generating alliances with other companies and civil associations to promote a better environment and development of society.

4. Heritage and Security

4.1 Use of Confidential Information

Employees may not disclose confidential company information to any person outside Grupo PROMAX, except to the extent necessary for Grupo PROMAX to carry out its activity.

Confidential information encompasses any information, printed document and/or digital file of the processes, systems, methods or mechanisms of the companies that make up Grupo PROMAX, employees, competitors and customers; marketing databases, corporate structure, business plans, development plans, technical, financial and legal information, information on human resources, product and service plans and/or formulas, price information, marketing reports, analyses and projections, specifications, intellectual property components, trade secrets, designs, plans, industrial processes, all kinds of information, data and/or electronic media, and other business or technical information, as well as any other information that in the ordinary course of business would be considered confidential.





Every employee of Grupo PROMAX has the obligation to protect confidential information even after separating from it. Safeguarding confidential information is the obligation and commitment of shareholders, directors, administrators, staff in general, external auditors, service providers, consultants, suppliers, and customers of Grupo PROMAX.

If confidential information of Grupo PROMAX is provided to third parties, for any reason, the person responsible for the project must ensure that such information is duly approved, protected with a confidentiality agreement and consulted for this purpose.

4.2 Accounting and Recording

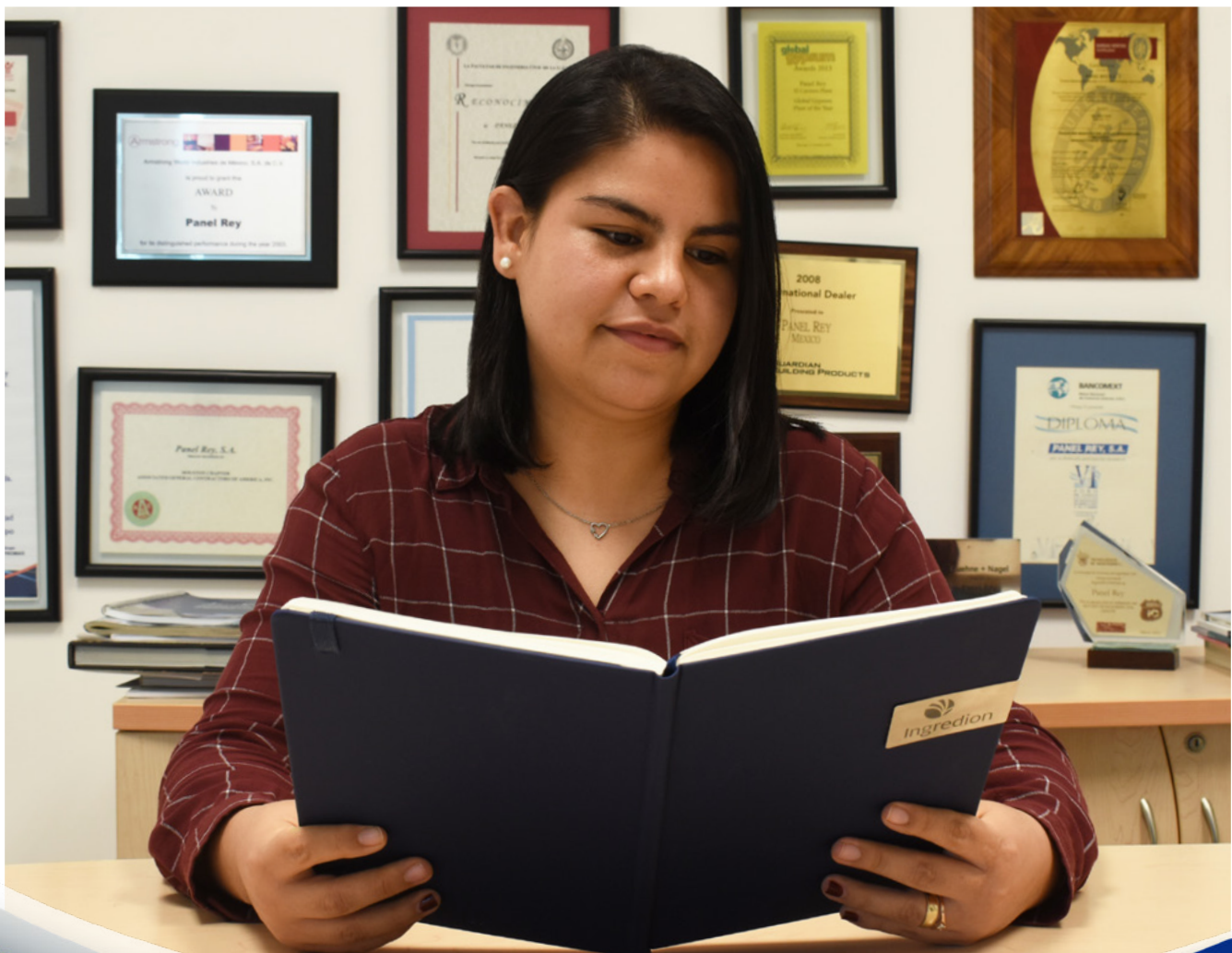
We have a technical discipline whose purpose is the measurement and analysis of the financial situation of the company in such a way that it can make responsible decisions, being accountable to the laws and society.

The purpose of accounting is to obtain crucial accounting information from the organization in a detailed, reliable, and verifiable way that serves for control and administration processes.

We will follow the most demanding standards in accordance with the accounting and financial standards that govern each country for the maintenance of our accounting, daily records, administrative and financial operation reports. The books should reflect all the components of our transactions, as well as our rule of honest and straightforward presentation of the facts.

Each employee shall comply with these standards and maintain appropriate records of all transactions and keep them in accordance with appropriate data archiving and retention plans, as well as cooperate in internal and external audits.

Falsifying or concealing information is prohibited; If any employee provides false reports, he or she will be subject to appropriate disciplinary action.



4.3 Protection and Proper Use of Company Assets

All Grupo PROMAX assets must be adequately protected and used only for purposes related to the company. These assets include resources such as: production equipment, control equipment, transport and personnel vehicles, cargo vehicles, delivery vehicles, utility vehicles, office furniture, copiers, tools, spare parts, laboratory equipment and materials, facilities in general, telephone equipment, computer equipment (as well as assigned), software, internally developed applications, web services and consulting services (for which the company has the necessary manufacturer's license for use), among others.

All assets must be used in a manner consistent with the Code of Ethics and Conduct and all company policies.



All employees will have the obligation to safeguard the passwords to access systems and programs used by Grupo PROMAX, as well as to take care of the security of the devices with which they access. This is done to prevent information leakage and/or misuse. Where applicable, they will be required to use Multi-Factor Authentication and use strong passwords that include letters, numbers, and special characters.

Access to the systems and programs used by Grupo PROMAX is non-transferable. Software used internally may not be copied or distributed to third-party computers and/or individuals, except for authorization from the Information Systems area.

Employees are responsible for the custody and safeguarding of the assets under their control. Under no circumstances shall they participate, influence, or allow situations or actions that are linked to the theft, misuse, lending, disposal or sale of assets in an unauthorized manner. In the event of any theft action, it must be reported immediately, and the resulting responsibility must be assumed.



"Staff are responsible for the custody and safeguarding of assets under their control."

—Grupo PROMAX

5. Ethics Program

5.1 Ethics Complaints

All our employees are responsible for understanding and ensuring that the ethical standards set forth in this Code, internal policies and applicable laws are followed. In case of doubt, they should seek advice and report as soon as possible any situation or behavior that in their opinion goes against these standards.

How and where to report?

Any incident or doubt about ethics can be approached by your direct manager, the Human Capital Department or reported confidentially through the TIP* (www.tip-PROMAX.com).

It is essential that at the time of making a report, as many details of the reported situation are provided with total honesty, as well as presenting possible evidence.

External advisors and other relationship groups are required to comply with the provisions of this Code as they relate to their work with the company.

Grupo PROMAX is committed to keeping any information confidential and reviewing such reports as soon as possible, acting accordingly to remedy the situation as necessary and in accordance with its internal policies.



5.2 Reports

Any collaborator with a team under his/her responsibility will have the responsibility to communicate the values and principles, as well as to support his/her team in understanding this Code.

The Ethics and Integrity Committee, made up of Grupo PROMAX employees, will ensure that the cases received are handled properly, confidentially and with due follow-up, as an impartial and impartial actor to safeguard the ethics of Grupo PROMAX.



If you consider that a complaint has not been properly processed or has not been followed up, it is suggested that you make the complaint again through TIP* (www.tip-PROMAX.com).

This Code cannot provide definitive answers to all questions, so it will be subject to the discretion and integrity of everyone.

If you have any doubts or require clarification, you should request support from your immediate manager and Human Capital or consult through TIP.

*TIP: PROMAX Transparency and Integrity Line -Ethical Whistleblowing Line-, It will be understood as the platform where complaints filed that violate the ethics and values of Grupo PROMAX, will be presented, substantiated and resolved.



yesera
monterrey.

ZN
ZINC NACIONAL

TSR
TRANSFORMACIÓN Y SERVICIOS INDUSTRIALES S.A. DE C.V.

PANEL REY
Paneles de Yeso

ZN
Cartoncillo

PLAFORAMA
CONSTRUCCIÓN Y ACABADOS

Perma
BASE
PANEL DE CEMENTO

MEREMEX

SDR
STEEL DUST RECYCLING

SUPERMASTICK **PR**

TURKMEX

WSP
WORLD SUSTAINABLE PRODUCTS

HARZOXID