

CODE OF ETHICS AND BUSINESS CONDUCT

Introduction

This Code of Ethics and Business Conduct (hereinafter, the “Code”) is a guide that promotes the honesty and ethical commitment of Grupo Aeroportuario del Centro Norte, S.A.B. de C.V. (hereinafter, “OMA”) as well as its affiliated companies and applies to all its personnel, directors, and employees (hereinafter, the “Employees”).

OMA's Employees are committed in everything they do and in the way they relate to each other and to those external to OMA. While the standards of the Code cover provisions stemming from the Securities Market Law, the bylaws of the Organization for Economic Cooperation and Development (OECD) Convention, the provisions contained in the Sarbanes-Oxley Act, the Foreign Corrupt Practices Act (FCPA), and the Law on Transparency, Fight Against Corruption and Modernization of Economic Life (Law No. 2016-1691) of France; in some cases, they go beyond legal obligations. In this respect, the Code reflects the values that define OMA and its interest in avoiding any circumstance that could give rise to conduct that is or appears to be inappropriate. The standards in this Code can be explained in more detail or implemented through manuals, policies, or mandatory observance codes, including those related to specific areas of OMA's operation. This Code is available on our internal network (intranet), as well as on OMA's internet page available to the general public (<https://ir.oma.aero/es/gobierno-corporativo/>) and in the offices of the Legal Affairs Department and the Human Capital Department.

Each Employee is personally responsible for ensuring that the decisions and actions of OMA's operation comply at all times with the letter and spirit of this Code. Given the pace of change in the industry, no set of rules can be considered the final word in all circumstances. When in doubt about the application of a standard or when there is no precedent for a situation that presents an ethical problem, guidance should be sought from the office of OMA's General Counsel and/or Human Capital Department. Furthermore, all Employees have a duty to report the behavior of others when it appears they are violating this Code, any other policy, or observance procedure of OMA.

All Employees and members of OMA's Board of Directors have the responsibility to proceed in all cases according to the standards of this Code, both in word and in deed. It is expected that Supervisory and Management personnel will promote and adhere to the “open door” policy. This means being available to any employee or Officer who has ethical concerns, questions, or complaints. These can also be brought before any proprietary member of OMA's Board of Directors, whether an Officer of the company or an independent director. All concerns, questions, and complaints will be received and handled promptly, confidentially and professionally. No retaliation shall be taken against an employee for raising any concern, question or complaint in good faith.

STANDARDS OF ETHICS AND BUSINESS CONDUCT

The following standards of conduct are applicable to the Employees. Anyone who violates them will be subject to immediate disciplinary action, which may include justified dismissal.

- **Compliance with Laws**

It is OMA's policy to be recognized as an entity respectful of legal provisions. Wherever OMA conducts business, OMA's Employees are required to comply with applicable laws, rules and regulations. Employees are also responsible for complying with contracts, intellectual property concessions, licenses, patents, non-disclosure agreements and any other contractual commitment undertaken. The provisions of this Code must be interpreted in light of the law and practices of the countries where OMA operates, as well as with common sense. There is no excuse for violating this Code; reasons such as *"everyone does it"* or *"it's not illegal"* are unacceptable.

- **Conflict of Interest**

OMA recognizes and respects the rights of Employees to participate in private activities that in no way constitute conflicts of interest with OMA or discredit it. Employees must avoid any behavior that could represent an illicit or disloyal practice for them or their colleagues.

No Officer should participate in activities or relationships that could be interpreted as a conflict of interest or that could negatively reflect on the Officer's loyalty to OMA.

A conflict of interest occurs when the personal interests of the Employee interfere with any of OMA's interests.

For OMA to carry out its operation effectively, it must be sure of the loyalty of its Employees.

Employees must, therefore, refrain from establishing relationships that could affect their judgment as to what is best for OMA. Relationships that appear to be a conflict of interest should be avoided. These rules cannot be evaded even when acting through a third party unrelated to OMA.

Conflicts of interest can arise in many forms. For example, personal financial interests, obligations to another company or government entity, or the desire to help a third party, including family or friends, are cases that could divide the loyalty of any Officer. To better understand the most common cases of conflict of interest, some specific standards are presented.

Employees who detect a possible conflict of interest or have doubts as to whether a specific situation constitutes a conflict of interest must be transparent with OMA and inform their immediate supervisor of the details of the circumstances, who, in turn, must inform the General Counsel of OMA, and when deemed necessary, the latter shall present it to the Audit Committee.

- **Conflict of Interest due to Professional Occupation with Third Parties**

Employees may not work for or receive compensation for services rendered to any competitor, client, distributor, or supplier of OMA. Furthermore, they may not serve as members of the Board of Directors of another company, or as Employees of a government agency without the prior approval of OMA's General Counsel. Many of these situations can represent a conflict of interest. Even when approval is granted, Employees must be careful to clearly separate OMA's activities from those that are not. OMA's Legal Department will assist in determining which actions are appropriate.

- **Conflict of Interest due to Investments**

Employees may not invest in companies or operations of any competitor, client, distributor, or supplier of OMA, other than operations with bonds or shares of public companies, and may not speculate or trade in materials, equipment, supplies, goods, or services that OMA purchases. Additionally, Employees may not invest in the shares or securities of any competitor, client, distributor, or supplier if these investments have any influence, or appear to have any, on their activities on behalf of OMA. If there is any doubt about how an investment might be perceived, it should be consulted in advance with the office of the General Counsel of OMA.

- **Conflict of Interest due to Use of Company Time and Assets for Personal Benefit**

Employees are not authorized to perform work that is not for OMA, to do so on its premises, or during the hours they are in the service of OMA, including any paid leave. The use of OMA's assets (equipment, materials, resources, or information owned by OMA) to perform any external work or for personal use is also not permitted.

- **Conflict of Interest due to Loans to Employees**

Loans to Employees and OMA's guarantee of obligations acquired by Employees for personal reasons can also constitute a conflict of interest. Such loans are legally prohibited in the case of members of the Board of Directors and executive employees. It is OMA's general policy that such loans and guarantees are not granted to Employees.

- **Conflict of Interest due to Gifts and Entertainment from Third Parties**

Gifts and entertainment offered or accepted by Employees or their family members on behalf of OMA may constitute a conflict of interest. However, gifts up to the equivalent of a maximum of 25 Units of Measurement and Updating in force in Mexico City are permitted¹.

It is prohibited to accept anything else that could reasonably be considered to affect one's good judgment or that implies any express or implicit understanding that the recipient is in any way obligated to do something in return.

¹ On January 10, 2025, the Unit of Measurement and Updating was published in the Official Gazette of the Mexican Federation, determining that the daily value of the Unit in force as of February 1, 2025, is \$113.14 Mexican pesos, in accordance with article 4 of the Law to Determine the Value of the Unit of Measurement and Updating of Mexico.

Similarly, Employees may accept entertainment, but not beyond what is reasonable in the context of the business, and always provided that it facilitates business gifts, gratuities, or courtesies for themselves or for any of their family, friends, or third parties.

- **Conflict of Interest due to Relationships with Family and Friends**

OMA's standards of conduct are not intended to intrude into the personal lives of Employees; however, situations may arise in which relationships with family and friends constitute a conflict of interest.

Employees are not permitted to supervise, review, or influence the work evaluation or salary of their close relatives. Employees who have family or friends working for companies that seek to provide or do provide goods or services to OMA may not use their personal influence to affect negotiations. Employees who have family and friends working for the competition must refrain from providing OMA information, as well as from receiving and transmitting competitor information within OMA.

- **Conflict of Interest due to Public Activities**

We encourage Employees to participate in civic activities of their communities, including activities related to education and philanthropy. In doing so and when making any public communication, they must clarify that their views are personal and not on behalf of OMA. Community participation or service can also create situations where conflicts of interest may arise; this could occur, for example, when the community is negotiating goods and services or some other matter with OMA.

The law may require you to abstain from making a decision when these circumstances exist, depending on your position within OMA and other factors. Before making such a decision, the Employee must seek the advice of OMA's General Counsel. In any case, you must also cease your action to avoid a possible conflict of interest or the appearance of such a conflict. No Employee may undertake any service request that is not related to OMA's activity or on its premises without the approval of their immediate supervisor. Political contributions cannot be made as a representative of OMA. Nor may lobbying activities, or those that appear to be lobbying, be carried out for personal gain or for the benefit of third parties, before any government agency or with any public official, if the name of OMA is used.

- **Use of Position and Relationships for Personal Benefit**

Employees must not appropriate for themselves or for any other person or organization the benefit of any company with which they maintain relationships, or any real or potential opportunity they become aware of in the performance of their employment and that is related to OMA's line of business, without first obtaining the consent of the same. Employees are not permitted to compete directly or indirectly with OMA. Employees have a duty to advance the legitimate interests of OMA whenever the opportunity to do so arises.

- **Abuse of Privileged Information**

In the course of their duties, Employees may have access to information from OMA or other companies that is not available to the general public. The use of non-public or inside

information for the purpose of trading shares or other securities, whether by the Employees themselves, by any of their family members, or by any other person to whom the Employee has provided information, is strictly prohibited. Not only is it unethical, but it is illegal and could expose the Employee to civil and criminal penalties.

Laws prohibit trading OMA shares or other securities by anyone who possesses relevant non-public information. Relevant information is usually defined as any information that could influence a good-faith investor to buy, sell, or hold shares or other securities. Relevant information may include: financial results, financial projections, possible mergers, acquisitions or divestitures, significant product or service developments, and major changes in OMA's management. The laws prohibit anyone who possesses relevant non-public information from using it to tip off anyone who might trade with such information.

Violation of securities legislation is grounds for civil and criminal penalties, including economic sanctions or imprisonment. Employees who are unsure of the legal interpretation governing the purchase and sale of securities must consult with OMA's Legal Department before trading shares or other securities. Any Employee who participates in trading using privileged information will be subject to immediate and justified dismissal.

- **Conduct to Combat Extortion and Bribery**

In the contractual sphere of OMA and its affiliates, the "Anti-Corruption Declaration" and the "Anti-Corruption Clause" must be included, through which the rules of conduct that urge the avoidance and combat of extortion and bribery are recognized, in order to achieve standards of integrity in commercial transactions.

Below is the literal text of the "Anti-Corruption Declaration" as well as the "Anti-Corruption Clause", which must be incorporated and applied in all of the company's agreements:

Anti-Corruption Declaration:

"During the negotiations for the execution of the Contract and during its performance, each of the Parties has complied with their respective codes, rules, and/or policies of ethics, conduct, and anti-corruption; in addition to the Anti-Corruption Laws and the Anti-Money Laundering Laws (as such terms are defined below) as well as each and every law that directly or indirectly governs this Contract, including without limitation the labor laws regarding social benefits and protection of health, hygiene, and safety, as well as the rules governing the work of minors and disabled persons. The Parties state that during the negotiations with the Client and for the execution of this contract they have conducted themselves in accordance with (i) the Rules of Conduct to combat extortion and bribery published by the International Chamber of Commerce (the "Rules") and (ii) any legislation applicable to them, and that they commit to act in accordance with them during the execution of the same towards their counterparts and towards third parties. The parties expressly accept that the violation of these declarations or the Rules implies a substantial breach of this contract."

Anti-Corruption Clause:

"Anti-Corruption and Legal Compliance. (a) The Parties agree during the execution of this Contract to maintain adequate and sufficient conduct and controls to ensure ethical

performance in accordance with applicable standards, as well as to respect at all times the Code of Ethics and Rules of Conduct for Suppliers, Subcontractors, and Business Partners of the Concessionaire, having the explicit obligation to refrain from carrying out activities, acts, or omissions of an illicit nature that have as their object or effect (regardless of whether it materializes or is achieved), to obtain or maintain any undue benefit or advantage in relation to this Contract, including but not limited to: promises, offers, payments, or authorizations of offers or payments of any amount or thing of value, directly or indirectly, to any public official, government employee, political party, political party candidate, member of a political party, independent candidates or independent politicians, or any other entity or person related to the former, as well as to employees or persons related to the private sector; the foregoing, with the intention of obtaining or retaining an unfair competitive advantage, obtaining or retaining a business, illegally or improperly, or with the intention of inducing, improperly, any action or activity on behalf of any of the Parties in relation to this Contract (the "Acts of Corruption").

(b) The Parties undertake that all their activities, principal or accessory, in relation to this Contract comply with any national and international laws and regulations, implicit and express, in matters of combating corruption that are applicable to each of the Parties, as they may be modified from time to time, including without limitation, the General Law of the National Anti-Corruption System of Mexico, the General Law of Administrative Responsibilities of Mexico, as well as their regulatory provisions, the Foreign Corrupt Practices Act of the United States of America, the UK Bribery Act 2010, the Sapin II Law of France, and those laws and regulations that aim to implement the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (the "Anti-Corruption Laws"), and must at all times refrain from carrying out Acts of Corruption or equivalents that could compromise or affect their counterpart, or any of its related companies, recognizing that the breach of this Clause will be cause for rescission of this Contract, without prejudice to the claim for damages that may arise from its breach.

(c) The Parties shall refrain from carrying out Acts of Corruption that could affect or involve, directly or indirectly, their Counterpart. Furthermore, the Parties guarantee that their internal administration and accounting policies and controls are designed to comply with the Anti-Corruption Laws applicable to them and no modifications contrary to the standards indicated herein will be made without prior written notification between the Parties.

(d) The Parties also guarantee compliance with the applicable antitrust and economic sanctions laws. In accordance with the foregoing, they agree that they will not take any measure or activity that could subject any of the Parties to fines or sanctions under the Applicable Laws."

Additionally, this clause must be included in the contracting manuals and in the internal audit review procedure manuals.

- **Confidential Information and Patents**

Information is a valuable asset of OMA. All Employees have the obligation to safeguard OMA's confidential or proprietary information, as well as the information that clients and suppliers have entrusted to it.

In general terms, confidential and proprietary information is information that has not been disclosed to the public, that gives OMA a competitive advantage, or that could expose it to damages if disclosed prematurely or improperly, such as: formulas, patents, registered

trademarks, exclusive technology and processes, construction processes, internal calculations, unit prices, internal information about bids, alternative processes to propose to clients, as well as financial information, corporate strategy, and confidential information about relationships with clients and suppliers, among others. Employees who are not sure which information should be treated as confidential or proprietary should ask their immediate supervisor or the General Counsel of OMA.

Employees must be aware at all times that it is their obligation to protect OMA's confidential or proprietary information. Under no circumstances should they discuss confidential or proprietary information in public places. Nor should they disclose confidential or proprietary information to third parties without the express consent of the General Counsel of OMA, unless required by a competent authority.

The obligation to preserve OMA's confidential and proprietary information is not limited to the period of employment therein. This obligation continues even after no longer working at OMA.

- **Fair Dealing**

OMA is committed to dealing fairly and honestly with its clients, suppliers, competitors, and Employees.

- **Fair Dealing with Customers**

Doing business in a fair and honest manner with customers means that it must be based on the quality of our services and our ability to meet commitments. When prices and services are required to meet customer specifications, Employees are prohibited from using false data or manipulating data in such a way that it appears to comply with the specifications, even when this is not true. Additionally, it is against OMA's policy to refuse to deal with customers who are also acquiring services from the competition. Breaching this policy may also constitute a violation of competition or antitrust laws. Employees responsible for billing customers are required to accurately reflect the cost of services in the terms agreed upon in each negotiation.

Employees may not offer customers any benefit, reward, or prize that is expressly prohibited by law or by OMA's policies and procedures. When doing business, it is permitted to carry out common marketing and advertising procedures, including traditional promotional events, as long as they do not violate the law and do not expose OMA to contingencies.

- **Fair Dealing with Suppliers**

Doing business in a fair and honest manner with suppliers means that Employees responsible for purchasing or contracting services for OMA must do so objectively. Suppliers must be selected based on price, quality, and the characteristics of the goods or services. Employees must not accept or seek any benefit from a real or potential supplier that compromises their judgment or appears to do so.

It is also contrary to this Code and OMA's Policies to condition suppliers to stop operating with competitors or to condition them to contract OMA's services to continue their

relationship with it. Failure to comply with this policy may also constitute a violation of competition or antitrust laws.

- **Fair Dealing with Competitors**

It is OMA's policy to compete solely on the merits of its services. In this sense, false or misleading statements or insinuations about the competition, their products, or their services are not acceptable. Comparisons of OMA's services with those of competitors must be accurate and supported by facts.

Employees are prohibited from using any illegal or unethical method to gather information about the competition. This includes appropriating proprietary information or confidential business information or attempting to induce the disclosure of such information from employees and former employees of corporations, by assuming a false identity, or by other means. If any Employee has doubts about the legality of the information they possess or the manner in which it was obtained, they should consult with the General Counsel of OMA. Employees must treat information about competitors with sensitivity and discretion. This information should be available only in an appropriate context of legality and ethics, and be open only to those Employees with a legitimate need to know.

- **Fair Dealing with Employees**

OMA recognizes that its Employees are its most valuable resource. OMA values the contribution that each one makes and is committed to treating them with respect. This includes preserving the confidentiality of Employees records, refraining from intruding into their privacy, and supporting their aspirations in the workplace as much as possible.

- **Antitrust Restrictions**

The Federal Economic Competition Law of Mexico is binding for OMA, and one of its objectives is to prevent interference with a free market system. Under this law, OMA cannot establish formal or informal arrangements with other companies or individuals or engage in other activities that restrict free competition. Illegal practices may include, among others, fixing prices, allocating customers or territories, and illegally using a dominant market position.

Employees are prohibited from discussing sensitive information with the competition, such as pricing policies, bidding and contractual terms, alternative processes to propose to clients, unit prices, inventory costs, product or marketing plans, construction processes, market studies, and other non-public or confidential proprietary information. Such comments or any collaboration with a competitor on competitively sensitive matters may be illegal. In some circumstances, however, Employees are permitted to discuss confidential information with competitors, with the prior approval of the General Counsel of OMA. Employees are required to report as soon as possible to the General Counsel of OMA any situation in which a competitor has mentioned any of these matters or has suggested collaboration with respect to any of them.

- **Austerity**

It is OMA's policy to operate in an austere but decorous manner, through the efficient use of resources, restricting useless or superfluous spending.

- **Protection and Proper Use of OMA's Assets and other Resources**

OMA's success requires the commitment of all its Employees to the proper allocation and use of its assets, tangible or intangible. For these purposes, OMA's assets include: equipment, supplies, real estate, tools, inventories, cash, computer systems, computer software, computer data, vehicles, records or reports, non-public information, intellectual property or other sensitive information or materials, voicemail, electronic or telephonic communications, as well as OMA funds in any form. Employees are obligated to protect OMA's assets against loss, damage, misuse, theft, or sabotage, as well as to ensure the efficient use of OMA's assets. OMA's assets must be used only for business purposes. The Administration must approve any use of OMA's assets or services that is not merely for its benefit.

- **Appropriate books and records**

The laws require that OMA be sure that its books and records reflect correctly, clearly, and with reasonable detail, the recognition of transactions and the composition of assets. It is a violation of OMA's policy and is illegal for any Employee to influence or act to make OMA's books and records incorrect. Employees must not participate in or facilitate the creation of misleading, artificial, or false records.

It is expected that Employees cooperate fully with the activities of OMA's internal and external auditors. In particular, they must be strictly respected by all Employees and employees:

- **Access to OMA's Assets, Transactions Under Authorization, and their Accounting**

Access to OMA's assets is permitted only with specific or general authorization from the Administration; transactions must be carried out in accordance with the specific or general authorization of the Administration. Transactions carried out by OMA must be accounted for in such a way as to permit the preparation of Financial Statements in accordance with generally accepted accounting principles and with the applicable provisions to reflect the correct presentation of OMA's transactions and assets.

- **Adequate Books and Records**

All of OMA's books and records must be accurate and complete. It is strictly prohibited to make false or misleading accounting entries, to omit the recording of any liability or undisclosed bank accounts; as well as to recognize non-existent assets for any purpose. OMA will sanction Employees who make use of the described practices.

- **Origin of Payments**

No Employee may authorize disbursements with OMA funds with the knowledge that part of them will be used for any purpose other than that described in the documents supporting the payment.

- **Appropriate Internal Control**

The necessary administrative and accounting controls must be implemented to provide reasonable assurance that OMA complies with the previously described requirements and that the Financial Statements or other reports are accurate and reliably prepared; as well as that they disclose the required or important information completely, timely, and truthfully.

- **Donations**

Donations are a contribution in cash or in kind made in favor of civil societies or non-governmental organizations (NGOs) related to the operations of each airport without expecting anything in return, which must be previously approved in accordance with the OMA Good Neighbor Program (the "Program").

The personnel in charge of making donations at all times will conduct themselves through the ethical standards provided in this Code.

Any person involved in the Program must ensure that donations do not disguise illegal payments to public officials or other legal or natural persons, do not contribute to the financing of illegal activities, and other assumptions that go against this Code, the Manual of Policies and Procedures on Money Laundering Prevention, or applicable legislation.

- **Complete, Accurate and Timely Disclosure**

Given that OMA is a issuing company and its shares are registered to be traded and exchanged among the investor public, OMA is obligated to make disclosures to the investor public and is committed to complying punctually with all applicable requirements for its public disclosures. Therefore, OMA has implemented disclosure controls and procedures to ensure that its public disclosures are timely, comply with applicable regulations, and are in every way complete, truthful, accurate, and understandable. All Employees responsible for preparing OMA's public disclosures or who provide information as part of that process have the obligation to ensure that such disclosures and information are complete, accurate, and comply with the policies, controls, and procedures for disclosure established by OMA.

- **Discrimination and Harassment**

OMA is committed to providing a work environment that is free from any form of discrimination based on race, ethnic group, sex, beliefs, religion, age, disability, or sexual preferences. It is OMA's policy to provide equal opportunities to employees in relation to hiring, salary level, training and development, promotions, and other terms of employment.

Employment decisions will comply with all applicable labor laws. OMA will not tolerate harassment, including sexual harassment in any form. This includes verbal or physical

conduct that demeans or threatens any employee, creates a hostile work environment, unreasonably interferes with their individual work performance, or otherwise adversely affects their responsibilities in individual work.

- **Health and Safety**

OMA strives to provide Employees with a healthy and safe work environment. All Employees are responsible for supporting the achievement of this goal by following the health and safety rules. Employees must be aware of the safety procedures applicable to their workplace and comply with them. OMA promotes the necessary measures to prevent its Employees from consuming drugs or narcotics and from consuming alcohol in an excessive manner.

- **Environment**

Our commitment to clients, shareholders, authorities, the community, and Employees is to prevent pollution, as well as to continuously improve the environment and comply with all current legal provisions on environmental matters.

- **Bribery of Public Officials**

In Mexico, there are practices that are considered acceptable during negotiations; however, courtesies in restaurants or providing travel, attentions, or gifts of value may violate local, state, federal laws, or even foreign legislation and international treaties, when dealing with matters involving government officials or employees.

Mexican and foreign legislation consider bribery or commercial bribery of any nature as an illicit act. These acts constitute a breach of applicable laws, such as the provisions of the Federal Penal Code, the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the OECD, and the Foreign Corrupt Practices Act of 1979.

It is prohibited to make any payment, promise of payment, or give any object of value to national or foreign government officials or Employees. This includes making any payment through intermediaries, such as sales representatives, advisors, or consultants. Violations of applicable anti-corruption laws can result in severe civil and penal sanctions, for both OMA and each of the individual Employees involved. Employees are strictly prohibited from offering or giving anything of value, a bribe, commission, or consideration for the purpose of influencing or persuading any person or national or international government official or officer to obtain or maintain an undue commercial benefit or advantage.

Bribery of any nature is considered a serious breach of this Code and is grounds for immediate dismissal, regardless of the applicable legal consequences.

Attentions given on the occasion of the year-end to government officials in a generalized manner must be governed in accordance with the limits set by applicable legislation and will be authorized by the CEO of OMA.

- **Waivers of the Code of Ethics and Business Conduct**

Any request for a waiver or exception to any rule of this Code must be notified in advance to the General Counsel of OMA. Exceptions involving any of the executive Employees or members of the Board of Directors of OMA may only be granted by the Board of Directors itself or by the Audit Committee. All waivers or exceptions granted to executive Employees and directors will be disclosed to OMA's shareholders. All personnel must be aware that, in general, OMA will not grant waivers and will only do so when there is a justified cause.

- **Government Investigations**

OMA will cooperate fully with any government investigation. Any Employee who reasonably believes that a government investigation or request represents a risk or threat of some consideration, in relation to any of OMA's operations or practices, even if this consideration is beyond the scope of their responsibilities, must communicate it to the General Counsel of OMA and provide the basis for such a supposition. Tax audits and environmental inspections will be considered routine dealings with the government and therefore are not included in this form.

OMA will not always be able to protect both its own interests and those of the Employee, without giving rise to a conflict of interest. In that case, the Employee may need their own lawyer. Whether OMA pays the Employee's legal expenses will depend on legal or other restrictions, as well as the facts and circumstances of the matter.

- **Audits, Investigations, Disciplinary Action**

OMA will periodically conduct audits on compliance with this Code. A report of potential misconduct will be investigated by the appropriate personnel at the corporate or operational unit level, with prior notice to the General Counsel and the Human Capital Department of OMA and will be reported to the Board of Directors or the Audit Committee and to the corresponding authorities. Be advised that any false accusation of misconduct will be subject to disciplinary measures. All Employees are required to cooperate fully with any internal or external investigation. Employees must also maintain the confidentiality of any investigation and related documentation, unless specifically authorized by the office of the General Counsel of OMA to disclose that information.

Appropriate disciplinary measures for violating this Code may include from a reprimand, reparation of damages, to justified dismissal. Disciplinary action may also extend to the immediate supervisor of the offender, to the extent that OMA determines that the violation involved their participation or reflected their negligence.

Any person who takes any type of retaliatory action against an Employee who in good faith presented any doubt or concern about compliance with this Code will be subject to various sanctions, which may include justified dismissal.

OMA's document retention policies strictly prohibit the destruction or alteration of documents with the intent to obstruct a pending investigation, a foreseeable investigation, an investigative proceeding, or a study-based investigation.

- **Where to go for Guidance**

Employees who have questions about this Code should first turn to their immediate supervisor. OMA's "open door" Policy gives Employees the freedom to approach any member of management with ethical questions or concerns, without fear of retaliation. All inquiries from Employees made in good faith will be treated as soon as possible, professionally and without risk of sanction of any kind.

- **Whistleblowing System (Direct Line)**

Likewise, and for the purpose of receiving reports of violations of the Code, OMA makes available to Employees a direct line at no cost to the reporter, which they can use anonymously and confidentially with freedom and without fear of retaliation, guaranteeing at all times confidential and professional treatment. The direct line is: +52 55 7100 2193 PIN 2341, which is available 24 hours a day and 365 days a year, and the website: <http://omateescucha.integrityline.com>

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