

## CODE OF ETHICS AND RULES OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS AND BUSINESS PARTNERS

Grupo Aeroportuario del Centro Norte, S.A.B. de C.V. (“OMA”), its affiliates and subsidiaries - as a signatory to the United Nations Global Compact, the Anti-Corruption Initiative (“PACI”), and adhering at all times to the statutes of the Organisation for Economic Co-operation and Development (“OECD”) Convention, as well as the Rules of Conduct to combat extortion and bribery published by the International Chamber of Commerce, it has committed to maintaining best practices and promoting sustainable development and promoting respect for generally accepted principles in the areas of human rights, employment, the environment, and anti-corruption. In light of the above, and recognizing the responsibility for the impact of its activities on its main stakeholders, in the regions where it operates, and even globally, it has formalized these commitments in its Code of Ethics and Business Conduct, applicable to all its employees. Likewise, through this Code of Ethics and Rules of Conduct for Suppliers, Subcontractors, and Business Partners (the “Code”), “OMA” intends to foster and strengthen its commitments with all parties strategically involved in its activities. We are convinced that compliance with this commitment is directly related to the success of “OMA,” and therefore, we expect that its adoption will have a positive impact on our global network of suppliers, subcontractors, customers, employees, and investors as well as all the communities in which we work.

We expect all our Suppliers, Subcontractors, and Business Partners (“Strategic Partners”) to commit to this Code and implement the necessary measures to understand and comply with its rules of conduct. Our mutual success and the continuity of our business relationships depend on it. “OMA” reserves the right to verify that any Strategic Partner’s business operations comply with these rules. Failure to comply with this Code could limit the possibility of undertaking joint projects in the future. “OMA” expects its Strategic Partners to maintain and strengthen their policies to ensure they incorporate best business practices and adherence to our Code.

These rules may be reviewed, modified, and updated periodically. The current version is available on the website: <http://www.oma.aero/es/somos/gobierno-corporativo/codigo-de-etica.htm> or at OMA offices. For questions, comments, or training support regarding our rules, please contact the Group General Counsel ([adiazgalindo@oma.aero](mailto:adiazgalindo@oma.aero)).

Suppliers and subcontractors can also find OMA's guidelines for our employees in our Code of Ethics and Business Conduct, available at <http://www.oma.aero/es/somos/gobierno-corporativo/codigo-de-etica.htm> or at OMA offices.

### **Health, Safety and Environment**

The health and safety of our employees and all personnel involved in our work is our highest priority. We are also confident that complying with environmental regulations

will help us reduce the environmental impact of our operations. Therefore, we expect our Strategic Partners to:

- Ensure that work is carried out in a safe and healthy environment that helps prevent accidents, minimizes health risks, complies with current labor and health laws, and minimizes harmful impacts on the community in general; Implement workplace safety practices for all their activities (including regulatory and contractual requirements) and promote safety in every phase of their work processes with the commitment and collaborative behavior of all their workers;
- Conduct your operations in an environmentally responsible manner, in accordance with applicable environmental laws, our sustainability policy and our environmental standards.

### **Human Rights and Labor Practices**

We expect our Strategic Partners to:

- Protect and respect human rights by avoiding any kind of complicity in their abuse.
- Treat all your workers with dignity, respect, and fairness; and
- Conduct all your operations in a socially responsible, non-discriminatory manner, and in accordance with those provisions related to equal employment opportunities, child labor, forced or compulsory labor, working hours, wages and benefits, freedom of association, confidentiality of information and an environment free from any harassment.

### **Financial and Operational Controls**

We expect our Strategic Partners to:

- Maintain accurate, complete, truthful, timely, transparent, and understandable records in accounting, financial, and legal books, as well as an effective system of internal controls;
- Create, maintain and provide records to the business in accordance with applicable law and contractual requirements;
- Maintain accurate and complete records prepared for “OMA”, including records of working times and expenses;
- Do not share non-public information related to “OMA”; and

- Comply with laws related to confidential information, including the prohibition on buying or selling shares, as well as instructing others to buy or sell shares while having information about an event considered material and is non-public information related to “OMA”.

### **Conflicts of Interest, Gifts, Entertainment, and Courtesies in Business**

Our Strategic Partners, their employees, and their family members should not receive inappropriate benefits by reason of their relationship with “OMA” or carry out other activities that represent a conflict with the interests of “OMA”.

We expect our Strategic Partners to:

- Limit any promotional items or invitations to any type of recreational activities related to our employees to simple business courtesies. Such activities must be carried out in accordance with accepted business practices and never with the intention of influencing a business decision, creating a potential conflict of interest, or creating the appearance of an act that could be improper within the business relationship; and
- Disclose any conflict of interest with “OMA” so that, where appropriate, prior authorization can be granted before closing any such business transaction.

### **Improper Payments**

“OMA” promotes a zero-tolerance policy toward bribery and expects our Strategic Partners and their agents to do the same. We define bribery as giving or promising to give, directly or indirectly, something of value to someone to influence the actions of a third party. Bribes may include money, gifts, travel expenses, lodging, vacations, expenses, loans or products below market price, reciprocal favors, political or charitable contributions, or any other direct or indirect consideration or benefit.

### **Anti-corruption**

We expect that in carrying out their operations and activities, our Strategic Partners will adhere to (i) the Rules of Conduct for Combating Extortion and Bribery published by the International Chamber of Commerce (“The Rules”); (ii) the Federal Law Against Corruption in Public Procurement (“The Anti-Corruption Law”); and (iii) any other applicable legislation, and that they will commit to acting in accordance with these provisions at all times, both towards their counterparties and third parties. “OMA” maintains a zero-tolerance policy for corruption.

Therefore, if any of our Strategic Partners or their agents violate these provisions, The Rules, or the Anti-Corruption Law in Public Procurement, it may result in the

termination of our business relationship and, where applicable, be reported to the relevant authorities.

### **Trade Controls**

We expect our Strategic Partners to:

- Know and comply with the export controls and economic competition laws applicable to the work performed by and in conjunction with “OMA”.
- Never participate in activities that represent a violation of applicable economic competition laws or other types of restrictive trade practices prohibited or penalized under the laws of the United Mexican States, as well as applicable local laws.

### **Money Laundering Prevention**

We expect our Strategic Partners to comply with applicable laws prohibiting money laundering, as well as those requiring the reporting of cash flows and other unusual transactions.

### **Company Resources**

OMA's resources include property, assets, intellectual property, and confidential information. We expect our Strategic Partners to:

- Safeguard the resources of “OMA” that are used in the course of the work being carried out, so that they are used only for legitimate business purposes and in protection of the interests of “OMA”;
- Respect the intellectual property rights of “OMA”, including its procedures (know-how) for carrying out its activities, as well as those of third parties at all times; and
- Maintain, handle and, where applicable, process any confidential information internally and on a purely useful basis, with the utmost care and in accordance with applicable law.

### **Fair Competition**

“OMA” is convinced that the free market system determines which companies succeed or fail based on merit, quality, price and other objective factors.

We expect our Strategic Partners to:

- Compete honestly and fairly;
- Comply with applicable competition and antitrust legislation; and
- Refrain from engaging in anti-competitive practices, such as price fixing or bid rigging.

### **I work with the Government**

We expect our Strategic Partners who collaborate on projects involving government entities to comply with any applicable special rules.

### **Complaints and reports**

Our Strategic Partners and their employees must immediately report any conduct related to “OMA” that contravenes the guidelines of this document, whether or not the matter is related to said Strategic Partners, because through the following means:

- (1) Anonymous reporting line 55 7100 2193 PIN 2341
- (2) Website: <http://omateescucha.integrityline.com>
- (3) Email of the group's General Counsel: [adiazgalindo@oma.aero](mailto:adiazgalindo@oma.aero)
- (4) Contact the group's General Counsel's Office.

The “OMA” reporting system is the way in which employees, suppliers, subcontractors and any third party can report facts related to illegal conduct or conduct contrary to the Code of Ethics and Conduct for Suppliers and Subcontractors.

Any of our Strategic Partners may be required to take reasonable actions necessary to cooperate with OMA in the investigation of any matter involving said Strategic Partner or OMA. OMA policies prohibit any form of retaliation against any person who has reported conduct contrary to this Code. Please contact the OMA whistleblowing hotline if you experience any threats or retaliation for filing a report.