

1. Background

N/A

2. Objective:

Promote compliance with all antitrust and / or economic competition laws. Antitrust laws are designed to:

- Protect the process of competition and free competition in a capitalist economy and,
- Prohibit anticompetitive conduct either by a single economic agent or by several economic agents acting together.

3. Scope

This policy applies to all employees of Thelsa Relocation Solutions, Thelsa Mobility Solutions, The Attic, Meet Point, Expat Meet Point, and any other corporate entity related to Grupo Thelsa.

4. Definitions

Cartel: A cartel is an agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition.

A cartel is regarded as the most egregious violation of Anti-Trust laws in most jurisdictions, which may lead to the imposition of significant fines as well as, in certain jurisdictions, criminal penalties.

5. Guidelines

Thelsa Mobility Solutions Will Not Tolerate Cartel Conduct

Thelsa Mobility Solutions respects the Anti-Trust laws and regulations in the countries in which it operates and requires that its Affiliates do the same. Involvement in a cartel is unacceptable. It is against Thelsa Mobility Solutions core values of competing freely and fairly, based on the added value of its products and services.

The laws and regulations that sanction cartel conduct are in place in most jurisdictions. These laws and regulations are designed to promote free and fair

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competition and to protect consumers. Anti-Trust compliance programs are e to detect and prevent cartels.

Why should we familiarize ourselves with the laws of economic competition?

Each employee is responsible for ensuring that they do not violate any economic competition law or Thelsa Mobility Solutions Antitrust Policy. It is important to remember the following:

- Thelsa Mobility Solutions is a global company, with operations in many countries.
- Each country has its own economic competition laws.
- Antitrust measures are carried out jointly by governments around the world.
- Our businesses have effects in more than one country and are therefore subject to different laws.
- It is necessary to be clear about the prohibited anticompetitive behaviors, to identify those situations in which the support of the Legal Department is required.

Fines for violation of Antitrust Laws

Thelsa Mobility Solutions operates in different countries, so it is exposed to different civil and / or criminal fines. For example:

United States of America:

- Criminal penalties for companies - up to \$ 100 million.
- Criminal sanctions for individuals - up to 10 years in jail and / or fines up to \$ 1 million.
- Orders to Do or Not to Do - courts can order the company to sell assets or leave markets.
- Private antitrust actions - Civil Liability, Three times (3x) damages

European Union:

- Fines for companies - up to 10% of global profits

Latin America.

- Mexico: Fines for companies - up to US \$ 6.5 million (approximately). In case of recidivism, whichever is greater between 10% of annual sales or the value of the assets and even the divestiture of assets.

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Note. Antitrust measures may cross borders. Many government agencies work together to investigate and strengthen antitrust laws. You may be subject to the antitrust laws of another country as your actions may affect the trade of that other country.

What is the purpose of the Antitrust Laws?

- Action with others: It is illegal for two or more economic agents to agree to restrict trade by hindering the free market and free competition.
- Individual action: An economic agent cannot monopolize or attempt to illegally monopolize a product or service.

Note: The Antitrust Laws do not prohibit any restrictions on trade, but only those restrictions that are anti-competitive.

Thelsa Mobility Solutions and its suppliers will ensure that they are aware of all applicable laws and regulations that cover anti-competitive practices in all jurisdictions in which they operate, and that they will obey and respect those laws and regulations.

Thelsa Mobility Solutions y sus proveedores se asegurarán de que conozcan y cumplan con las leyes y regulaciones aplicables en relación con los cárteles.

Main Risk Areas under Antitrust Laws

- Price fixing
- Industry and Commerce Associations
- Market Division - Supply Restriction - Production Limits
- Reciprocal and similar treatment
- Boycotts
- Fusions and acquisitions

Price fixing

Price fixing between competitors is a monopolistic practice prohibited by the Antitrust and economic competition laws, so:

- ✓ Never discuss the prices at which each one sells to its customers.
- ✓ If a competitor is also your customer, strictly limit your discussions to the terms under which it will be sold. Clearly segregate the functions of those who serve the competitor as a client of those who handle issues that compete with it.

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- ✓ Never share the pricing and offer strategy with your competitors.
- ✓ Never exchange private information, unless previously discussed with the Legal Department.
- ✓ If is necessary, clearly segregate the commercial strategy areas from the operations.
- ✓ Respect the legal and administrative guidelines of Thelsa Mobility Solutions.

Industry and Commerce Associations

Industry and trade association meetings are legitimate discussion forums; However, it is important to remember that:

- ✓ These meetings must have an Antitrust policy statement, which must be read before each meeting.
- ✓ The presence of a lawyer who supervises the meetings is necessary.
- ✓ Conversations about prices, markets, customers, volumes, strategies, etc., Should be avoided.
- ✓ If in any conversation these issues are touched:
 - Excuse yourself clearly and forcefully.
 - Call the Legal Department for more information.

Market Division

Decisions about when, where and how to do business must be made internally. It is forbidden to agree market shares with competitors.

- ✓ Any commercial agreement that includes a non-competition agreement must be reviewed and approved by the Legal Department.

Reciprocal and similar treatment

Let customers decide which product to buy. It is forbidden to use market power to condition purchases.

Boycotts

Do not participate in boycotts with competitors. Agreements that aim to not negotiate with certain suppliers, customers or other competitors or that seek to take measures that tend to exclude certain participants from the market or deny them access to important competitive benefits that are accessible to others in the

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market are prohibited. Any decision not to sell to any economic agent must be made internally and based on legitimate business reasons.

Fusions and acquisitions

In many markets, mergers, acquisitions or associations are highly regulated by the Antitrust authorities. Remember:

- ✓ Be sure to comply with confidentiality agreements, as well as Antitrust laws.
- ✓ Do not share competitor information with other business units of Thelsa Mobility Solutions.
- ✓ Remember that any document created in acquisitions, mergers or associations can be requested by the authorities.

Ethical behavior

As a demonstration of their commitment, Thelsa Mobility Solutions and its suppliers undertake to adopt a zero-tolerance approach with respect to cartel conduct. At all times, Thelsa Mobility Solutions and its suppliers will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

Code of conduct

By accepting and committing to this Policy, Thelsa Mobility Solutions and each provider undertakes to:

1. Never make direct or indirect (via third parties including agents, suppliers or customers) contact with an actual or potential competitor or other third party, the object of which is to engage in cartel behavior.
2. Never propose or reach an agreement, whether directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issues, including:
 - Fixing prices
 - Dividing or sharing markets, customers or territories
 - Rigging a competitive bidding process
3. Report any indication or initiative of improper anticompetitive business conduct by an actual or potential competitor in accordance to your

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internal reporting procedure, including but not limited to, reporting to your legal department and/or to the relevant Anti-Trust authorities.

4. Not to participate in a meeting of a trade association in which sensitive competition-related issues are discussed. If such subjects are raised during a meeting, employees of FIDI Affiliates must immediately ask for the discussion to end. If not, they must leave the meeting and ask for that to be noted in the minutes of the meeting.
5. Ensure that all internal and external correspondence, including e-mails and texts, and documents, discussions and public statements do not contain any statements that might be misinterpreted by third parties or Anti-Trust authorities and courts in the context of a potential Anti-Trust investigation.
6. Maintain independent judgment in pricing or selling of any products and/or services.
7. Limit any information discussed during commercial negotiations, with or disclosed to competitors or other third parties, to that which is strictly necessary for completing or assessing the transaction.



 General Director

Policy effective as of: August 1st 2025

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