



ETHICAL CODE

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Note: To facilitate the reading of the text, the masculine gender includes the feminine and the singular number includes the plural, except in cases where the context indicates otherwise.

I. Conflict of interests

1) Workers must avoid situations in which they are forced before people who could benefit from special treatment or favor on their part; workers will not seek preferential treatment from other people who could cause damage to OPEMA.

2) Workers will not have monetary interests that distract them from their obligations in any way. Nor will they be involved or work outside of OPEMA in the event that this could reduce their ability to provide OPEMA with impartial or disinterested service. There can be no contradiction, real or imagined, between the private interests of the workers and their official tasks.

3) Employees must avoid giving or receiving gifts or favors in any of their forms, if there is any probability that this could improperly influence the recipient's assessment of their relationship with or for OPEMA.

II. Use of privileged information. Trading with OPEMA titles

1) The legislation applicable to OPEMA establishes rules that prohibit the use of privileged information. Privileged information is information that is not yet in the public domain and that may affect the company.

- A) Generally "Insider" (employee of a company who has access to privileged information of the same) refers to the company itself, its own executives, or to any person who controls more than 10% of a type of OPEMA shares with the right to vote

B) The rules that prohibit the use of privileged information apply not only to the Insiders of the company, but also to anyone who has a relationship with it.

2) The sanctions provided by law for those who use privileged information illegally are of two types: criminal and civil.

The criminal sanctions, which may vary depending on the case, are severe and establish prison sentences and/or heavy penalties.

The civil penalties are such that any person who illegally uses inside information must compensate the loss suffered by the third party who traded either with him or with a person who used the inside information that he provided. Those who use this type of information illegally will also have to give the company the benefits obtained in this way.

Finally, some of the aforementioned laws determine that when there is more than one person who fails to comply with the rules on the use of privileged information, the responsibility will be joint and several between all of them.

III. Business administration

1) All assets and liabilities must be recorded in the accounting books. Funds or assets that do not appear in them will not be accepted or maintained for any purpose.

2) In no case should false or incorrect entries appear in the books or files that hinder the understanding of the transaction in question.

3) No transaction will be made, nor will any payment be made, with an intention or purpose other than that documented, nor should any part of said payment be used for purposes other than those specified in the document that guarantees said payment.

4) All illegal payments regardless of the nature or use of Company funds or assets that are made for reasons that may violate applicable laws or regulations are prohibited.

IV. Management Philosophy

The Company has adopted a management philosophy. The worker must abide by his principles.

OPEMA meets the needs of customers, therefore, it carries out high-quality civil works.

OPEMA respects the environment and takes into account the needs of the community when making decisions

V. Policy for equal opportunities at work

OPEMA has adopted a policy of equal opportunities at work. The Board of Directors and the workers agree to follow and apply its principles.

VI. Intellectual property

Taking into account the work and services for OPEMA and the amounts paid, or to be paid, by OPEMA to the worker, the latter hereby agrees that:

1) While working and providing services for or in the Company, or after them, the worker will keep confidentiality and will not use or disclose to third parties information, knowledge, data considered secret, with intellectual property, or confidential given by the Company, or by any of its workers, or other persons, entities or companies with which the Company has had a commercial relationship, nor knowledge and information that the worker may have, or may have in the future, during the exercise of their functions in relation to the management or data of past, present or future management of the Company, (hereinafter, both individually and collectively called "intellectual or industrial property"), unless the Company has authorized in writing the use of said intellectual and industrial property .

2) While being an employee of the Company and for a subsequent period of thirty-six (36) months, the employee must refrain from applying for patents, or making use of, any invention or discovery, unless they have the written authorization of the Company. Business.

VII. Personnel and Environment

The protection of the environment must be a constant objective for all workers.

The workers undertake to respect all laws and regulations in force in their community and to follow the policies and guidelines that OPEMA regularly determines regarding the environment.

Workers must be aware that failure to comply with these rules can have serious consequences for OPEMA, its workers and society in general. Any worker responsible for the abandonment of said obligations will be subject to disciplinary actions, including dismissal, depending on the seriousness of his action.

VIII. Distribution and compliance with the Code

1) The Board of Directors will review the measures adopted to comply with this Code and detect any breach of it.

2) Any worker who is not sure whether or not something is prohibited or required under this Code should consult the OPEMA Manager.

3) Any violation of this Code may be the cause of due and timely disciplinary actions, including termination of the contract.

4) This Code must be applied in OPEMA.

5) Any worker who has to sign this Code and does not do so will not be able to claim in the future that they were not aware of the provisions established in this document.