

## Economic Competition Policy



### 1. Purpose and Scope

This Policy stipulates the principles and commitment of Infraestructura Energética Nova, S.A.B. de C.V., and its Subsidiaries and Related Parties in Mexico, hereinafter referred to as “IEnova” or the “Company” to inform the officials and employees of the content and scope of the legal and administrative provisions applicable to economic competition to advise them of the conduct to be avoided to prevent incurring in breaches of the law, as well as the measures to be taken to reduce the risk of committing offenses, infringements or monopoly practices.

This policy applies to all IEnova's personnel (whether with a permanent or temporary contract and/or subcontracted. This policy also applies to contractors, suppliers and operators of assets belonging to IEnova or its Subsidiaries that adhere to it.



### 2. Index of Themes

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### 3. Policies

Breaches of the Federal Economic Competition Law may have severe legal consequences both for the persons who breach the law and for the persons considered liable for participating in illegal conduct. Therefore, IEnova's Legal Department shall define the training and the communication plan with the employees in order to help them to identify offenses, infringements or Monopoly Practices.

Employees must inform the Legal Department of infringements of the policy in order to begin the respective investigation.

#### 3.1 Contact with Economic Agents:

All IEnova's officials and employees shall refrain from conducting absolute Monopoly Practices, including but not limited to any of the following conducts:

- Agree, set, manipulate prices or other terms and conditions of sale or purchase with third parties, including the exchange of information with this purpose or effect.
- Agree the reduction of quantities or frequencies of goods or services that each of the Economic Agents offers to the market.
- Agree the reduction of quantities or frequencies of goods or services that each of the Economic Agents acquires from its suppliers.
- Agree the distribution or assignment of territories or customers to each Economic Agent.
- Agree the terms or conditions of the bids that each Economic Agent will submit in tenders or agree to abstain from participating in a tender for the benefit of another Economic Agent.
- Exchange information on prices, costs or profit margins or with terms or conditions other than those of the Economic Agent. Information of this nature required by the authority for regulatory purposes shall always be submitted directly to said authority and never to other Economic Agents.
- Attend meeting with Economic Agents at which the order of business discusses prices, costs or profit margins, or those at which the intention can be expected to discuss these and issues other than those mentioned above.
- If, although not part of the order of business or said situation cannot be anticipated, the issues mentioned in the preceding point arise at a meeting attended by Competitors, the attendees must be warned that discussing said issues may constitute a breach of the law and their discussion must be opposed. If, despite this warning, the discussion continues, IEnova participants must leave the meeting and request that such departure is noted noting the reason for their abandoning it.

| General                            |                                     |
|------------------------------------|-------------------------------------|
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- The source of prices or sensitive market information obtained from public channels or clients held in their files must always be registered. The Company may obtain this type of information legitimately provided that it does not originate from an exchange of information with their Competitors. However, it is very important to avoid that holding said information be a reason of suspicion in case of an investigation by the competition authority.

### 3.2 Relationships with Customers and Suppliers:

All IEnova's officials and employees shall be responsible for consulting the Legal Department before conducting a transaction or when any of the following acts are performed, which may be considered as Monopoly Practices, including but not limited to:

- Entering into agreements or any type of verbal or written agreement that confers on another Economic Agent the exclusive right to distribute or market IEnova's goods or services.
- Setting resale prices or other condition for customers that must be observed when marketing IEnova's goods or services.
- Conditioning the sale of a good or service to a customer acquiring another.
- Conditioning the sale of a good or service to a customer not acquiring those offered by an IEnova Competitor.
- Offering customers discounts or incentives so as not to acquire goods or services offered by an IEnova Competitor.
- Acquiring goods or services on the condition that the supplier does not sell to third parties.
- Declining to sell or render services to a particular person.
- Agreeing strategies with customers or suppliers that harm IEnova's Competitors.
- Selling the same type of goods or services at different prices and in different conditions to two or more customers in the same circumstances.
- Carrying out conducts or designing or implementing any strategy aimed at increasing Competitor's costs.
- Selling goods or services at below-cost prices. This conduct will require prior consultation with the Legal Department, although it involves goods or services in which the Company is not presumed to have a substantial market share.
- Using the gains obtained from the sale, trade or rendering of a good or service to finance losses incurred from the sale, trade or rendering of another good or service.
- Declining or restricting access or allowing discriminatory access to an essential supply by one or several Economic Agents.
- Reducing the margin existing between the price of access to an essential supply and the price of the good or service offered to the end-user by using the same supply for its production.

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### 3.3 Relationships with Subsidiaries: agreements

All contracts or any type of verbal or written agreements signed by and between IEnova and its Subsidiaries or vice-versa shall adhere to the provisions of "GE-04 Related-Party Transactions Policy" and "GE-05 Cross-Participation Policy", which among others, are aimed at protecting and ensuring Competition and the Arm's Length Principle.

### 3.4 Concentrations

IEnova's officials shall be responsible for informing the Legal Department of issues related to mergers, acquisitions of control or any other act that merges companies, associations, shares, partnership interests, trusts or assets in general performed with competitors, suppliers, customers or any other economic agents, in accordance with the FI-01-P01 Mergers and Acquisitions Procedure.



## 4. Definitions and Terminology

| Term  | Definition  |
|---|---|
| <b>Economic Agent</b>   | Any individual or company, either for-profit or otherwise, departments and entities of the Federal, State or Municipal Public Administration, associations, business chambers, professional groups, trusts or any other form of participation in economic activity.   |
| <b>Barriers to Competition and the Arm's Length Principle</b> | Any structural characteristic of the market, fact or act of the Economic Agents with the purpose or effect of obstructing access by competitors or limiting their capacity to compete in markets or obstruct or distort the competition process and arm's length principle, as well as the legal provisions issued on the order of any government that unduly obstructs or distorts the competition process and arm's length principle. |
| <b>Competitor</b>   | Any Economic Agent that renders services equal or similar to Inova's services or operates in the same market niche.   |
| <b>Policy Owner</b>   | The individual responsible for creating, reviewing and ensuring that the content of the policy is updated, relevant and is in compliance with the applicable laws and regulations.  |
| <b>Entity</b>   | An identifiable unit that performs economic activities constituted by combinations of human, material and financial resources (consisting as a whole of economic activities and resources), conducted and managed by a single control center that takes decisions focused on meeting the specific goals for which it was created.   |
| <b>Monopoly Practices</b>                                     | Agreements or acts performed by and between two or more Economic Agents with the intention of preventing or restricting competition among them or actions aimed at unduly shifting the market toward other economic agents or imposing barriers to competition and the arm's length principle.  |

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|                   |   |
|-------------------|---|
| <b>Subsidiary</b> | An Entity in which IEnova is a stockholder and in some manner, exercises "control" over it. IEnova is understood to exercise control of another Entity if it has the capacity to perform any of the following actions: (i) impose, either directly or indirectly, decisions at the of the stockholders, partners or equivalent bodies, or appoint or remove the majority of the members, administrators or their equivalents of an Entity; (ii) hold the ownership of the rights that permit, either directly or indirectly, to exercise the vote of more than 51% of the capital stock of an Entity; or (iii) manage or direct, either directly or indirectly, the management, strategy or the main policies of a company, whether through the ownership of securities, by contract or any other manner. |
|-------------------|---|

The terms above may be used in singular or plural form and in masculine or feminine form depending on the context of this policy.



### 5. References and Forms

#### 5.1 Internal References

- Code of Ethics
- GE-01 Corporate Ethics Policy
- GE-04 Related-Party Transactions Policy
- GE-05 Cross-Participation Policy
- IEnova Suppliers' Conduct Guidelines

#### 5.2 External References

- Federal Economic Competition Law

#### 5.3 Forms

| Document Code and Name |  |  | Withholding Code |
|------------------------|--|--|------------------|
| N/A                    |  |  | N/A              |



### 6. Responsible Parties

| Responsibility                                    | Department                    |
|---|-------------------------------|
| Managing the content of the policy (Policy Owner) | Legal Director                |
| Complying with the policy                         | All employees                 |
| Overseeing compliance                             | Legal Department              |
| Applying sanctions                                | Talent and Culture Management |

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### 7. Authorization

| Name                     | Position  |
|--------------------------|---|
| Rene Buentello Carbonell | Executive Vice President of Compliance and General Attorney |
| Roberto Rubio Macías     | Comptroller Vice-President                                  |
| Ramiro Fernández         | Sr. Compliance Manager                                      |



### 8. Contacts (Doubts and/or Clarifications)

Questions related to the implementation of or compliance with this Policy must be discussed with your immediate supervisor. The contact designated as responsible in this Policy will be the Legal Department or you can contact the Ethics Helpline on 800 062 2107. The Ethics Helpline is available 24 hours a day, 7 days a week. All calls received by the Ethics Helpline will be treated as confidential.

| Contact          | E-mail                  | Telephone Number   |
|------------------|-------------------------|--------------------|
| Araceli Enríquez | aenriquez@ienova.com.mx | (614) 445 18 18 39 |
| Rodrigo Cortina  | rcortina@ienova.com.mx  | (55) 91 38 01 00   |
|                  |                         |                    |
| René Buentello   | rbuentello@ienova.com   | (55) 91 38 01 00   |

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### 9. Change Control

| Review | Date          | Description             | Section Affected | Observations  |
|--------|---------------|-------------------------|------------------|---|
| 01     | Aug 1, 2020   | Policies review project | General          | Changes in definitions<br>Additions of guidelines in the "Policies" section |
| 02     | June 23, 2021 | Form adequations        | 4, 5.1           |   |