



# **ANTI-CORRUPTION POLICY**



Strategic position statement on anti-corruption and anti-bribery practices.

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### JUSTIFICATION

The business philosophy of Consorcio IUYET, S.A. de C.V. and its growth strategy in the different markets requires management schemes with the highest standards, as well as strict compliance with the regulatory framework.

### PURPOSE

The purpose of the anti-corruption policy of Consorcio IUYET, S.A. de C.V. is to declare its commitment to acting ethically and transparently in the public and private spheres, as well as to conduct its operations in a legal and responsible manner, guided by a philosophy of zero tolerance for acts that contravene organisational principles and values.

### SCOPE

This policy is applicable to all employees of Consorcio IUYET, S.A. de C.V. and to all related parties such as suppliers, customers, shareholders, contractors, subcontractors and in general to all those with whom a commercial or contractual relationship is directly or indirectly established.

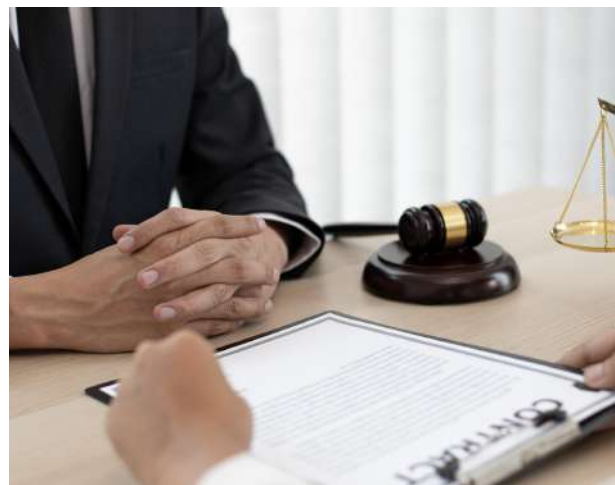


# GLOSSARY

- **Corruption:** Any act, attempt or deliberate omission to obtain a benefit for oneself or others to the detriment of organisational principles, irrespective of the financial effects on the company.
- **Bribery:** Consists of any offer, financial or other promise to a person with public or private responsibilities, as an inducement or reward for carrying out an activity (or not, as the case may be) dishonestly, i.e. in bad faith or in breach of trust.
- **Facilitation payments:** These are a form of bribery made for the purpose of expediting or facilitating the performance of a public servant. These payments tend to be demanded by officials in order to provide an exceptional level of service, and in this sense, can be considered an act of corruption.

Bribery and corruption are criminal offences that damage a company's reputation, which can result in exclusion from public bidding processes, inclusion on international, federal, state or municipal restrictive lists, as well as heavy fines.

Consorcio IUYET, S.A. de C.V. does not accept, promote, co-sponsor or cover up this type of operation and declares its firm commitment to conduct its business in a transparent manner, without resorting to this type of practice.



# GUIDING PRINCIPLES

## CONSISTENCY

All employees, regardless of rank or hierarchical position in Consorcio IUYET, S.A. de C.V., must act in accordance with institutional principles and practices. No employee may, directly or indirectly, conceal, sponsor or participate in acts of corruption or bribery, whether with public or private entities, whether local or foreign.

## RESPONSIBILITY

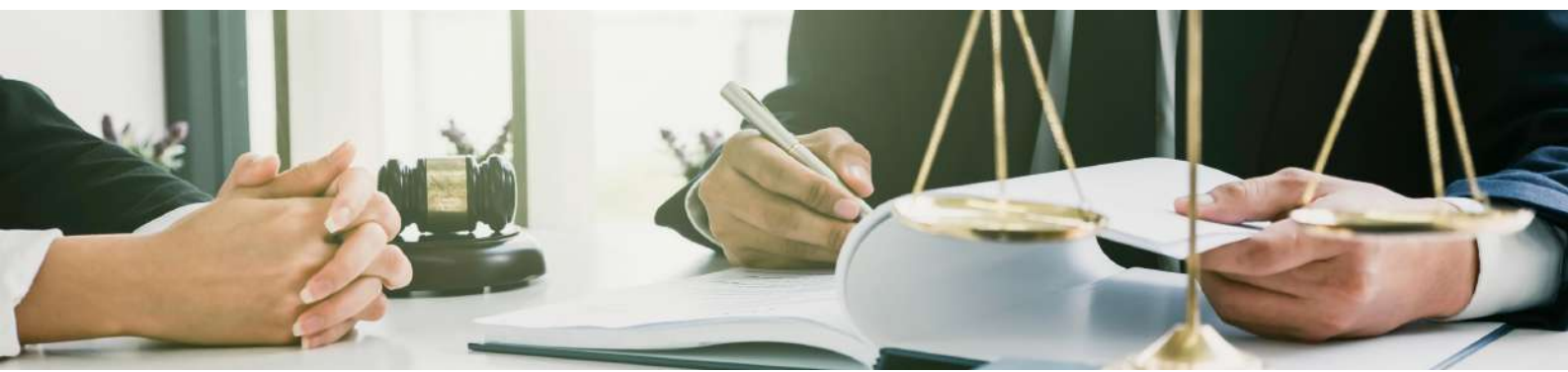
Any reported or detected fact that has any kind of relation to corrupt practices or bribery, whether with public or private entities, will be carefully investigated, documented and analysed. Those situations that effectively correspond to acts of corruption or bribery will be sanctioned regardless of the amount, characteristics or hierarchical position of those responsible, always keeping proportionality with the facts and guaranteeing due process.

## DUTY TO REPORT

All employees of Consorcio IUYET, S.A. de C.V. as well as related third parties, especially those with whom commercial or contractual relations have been established, are obliged to inform the management of facts or circumstances that could be considered acts of corruption or bribery. It is guaranteed that no one will suffer any detrimental treatment, retaliation or questioning for refusing to participate in an act of bribery or corruption, or for submitting reports that in good faith expose suspicions of bribery or other corruption offences.

## TRANSPARENCY AND LEGALITY

All facts or circumstances that are detected and verified will be disclosed using the information protocols established in Consorcio IUYET, S.A. de C.V., always respecting the principles of transparency, legality and information balance.



# ANTI-CORRUPTION POLICY

Consorcio IUYET, S.A. de C.V. totally prohibits and condemns bribery and corruption in all business relations and in all transactions between the company and any organisation, whether public or private.

Any attempt to unlawfully influence the activities of public officials or any associated party is prohibited.

The employees of Consorcio IUYET, S.A. de C.V. must refuse any bribes or illegal inducements of any kind in a way that does not give rise to confusion. Staff shall immediately inform the management of such offers.

It is strictly forbidden for Consorcio IUYET, S.A. de C.V. employees to make bonus payments, as the company will not tolerate or consent to such acts.

It is strictly prohibited to offer, receive or transfer anything of value to a public official or any other associated party, whether or not it is considered a bribe.

All Consorcio IUYET, S.A. de C.V. personnel are prohibited from offering gifts to complete regulatory or legal obligations.

Without exception, the personnel of Consorcio IUYET, S.A. de C.V. must conduct their activities, whatever they may be, under the principles of honesty and ethics.



# CONSEQUENCES

Violations of this policy and the applicable regulations may result in serious civil and/or criminal penalties, both for the company and for the individuals involved.

Financial penalties under some laws are unlimited and often exceed several million pesos. Criminal penalties can reach up to ten years imprisonment, in addition to personal fines that Consorcio IUYET, S.A. de C.V. will not pay on your behalf or assume as its own.

Any breach of this policy will result in disciplinary action by Consorcio IUYET, S.A. de C.V., including dismissal of the offender, regardless of any legal action by the authority that may arise from it.

Consorcio IUYET, S.A. de C.V. reserves the right to take legal action against individuals or companies that disseminate information on this subject that may be harmful to the company.

