Code of Conduct

The following Code of Conduct (hereinafter, the “Code”) has been approved by the officers of Business Factory Corporation S.A. de C.V. (“BFC Consulting”). In all cases, the National Legislation will be respected.

• The officers and the direct and subcontracted staff of “BFC Consulting” and subsidiaries, recognize their obligations to all those who have a real interest in the success of the company, including shareholders, clients, employees and suppliers.

• The information on our activity must be communicated with clarity and precision, without discrimination and in accordance with the local and federal provisions.

• We select our personnel and we promote them according to their education and merits, without any discrimination based on ethnicity, religion, nationality, color, sex, sexual orientation, identity or sexual expression, age or disability.

• We think that the workplace should be safe and civilized; we do not tolerate sexual harassment, or any type of discriminatory or offensive behavior, including the degrading treatment of persons whether verbal or physical, the exhibition or distribution of offensive material, or the use or holding of firearms in the offices of “BFC Consulting” or its clients.

• We do not tolerate the use, holding or distribution of illegal drugs, or that our personnel come to work under the influence of drugs or alcohol.

• The trafficking of privileged information is strictly prohibited, as well as the use of reserved information to one’s own benefit.

• We do not deliberately create works that contain assertions, suggestions or images offensive to the public in general and we will give the consideration deserved to the minority segments of society, regardless of their ethnicity, religion, nationality, color, sex, sexual orientation, sexual identity or expression, age or disability.

• We do not participate, to our own benefit or that of our families, directly or indirectly, in any activity for companies that are competitors of “BFC Consulting” and subsidiaries, that enter into conflict with the obligations we have assumed with the latter.

• We do not offer gifts of any kind as personal inducement to guarantee the continuity of the activity; this is not intended to prohibit measured attentions or occasional gifts of small value, unless the client has a restrictive policy in that respect.

• We do not accept to our own benefit goods or services above the nominal value, provided by providers, potential providers or third parties.

• We will not have personal or family conflicts of interest in our activity, with our providers or with third parties with which we have a commercial relationship.

• It is not permitted to make any type of contributions from the company, including providing services or materials for a value below market value, to politicians, political parties or activist organizations, without the prior written consent of the partner consultants.

• We will abide by the applicable laws and local provisions, and any other type of federal or international legislation.

Any conflicts that may arise now or in the future in relation to this Code must be immediately notified to the Human Capital area of “BFC Consulting”.

Complaint procedure

Any violation of this Code and, in particular, of the policy that prohibits discrimination or harassment, shall be notified immediately to the Human Capital area of “BFC Consulting”, or in its absence, to the Partners or Directors.

It is important that the complaint procedure be duly communicated to all the personnel.

All situations will be treated with confidentiality and will be investigated immediately. If the result of the investigation points toward the need to undertake corrective measures, the application of disciplinary procedures may be contemplated up to the point of terminating the employment of the infringing employee.

Last update: May 2018.