

**GRUPO COPPEL
INTEGRITY PROGRAM**

**GRUPO COPPEL'S
ANTI-CORRUPTION
POLICY**

GRUPO COPPEL'S ANTI-CORRUPTION POLICY

In Grupo Coppel we focus on creating sustainable and long-term relationships with our clients, associates, suppliers and external third parties.

For over 80 years, this way of working has allowed us to gain the trust of each one of them, acting in accordance with their values and within the framework of legality have always been our main objective. Therefore, having a Corporate Integrity Program guides us to refrain from participating in acts of discrimination, bribery, corruption and fraud, and at the same time it provides us with the guidelines to face, respond and mitigate such situations.

Thus, Grupo Coppel has developed an Anti-Corruption Policy which helps us to reject any act of corruption of public or private nature. We achieve this through our clear, visible and accessible rules, reiterating the commitment to act with integrity and in accordance with our corporate values.

THIS POLICY INCLUDES:



ZERO TOLERANCE FOR OFFERING, ACCEPTING AND/OR REQUESTING OF BRIBERY IN ANY OF ITS FORMS

Grupo Coppel does not tolerate or allow bribery in any of its forms and undertakes to comply with international laws and agreements regarding anti-corruption in any country where we conduct business. Thus, our Shareholder, Board Members, Directors, Collaborators and external third parties must comply with the following:

- Do not offer, promise or deliver directly or indirectly, to any authority officials, payments, tips, donations, job opportunities, sponsorship, special advantage or any benefit of any kind with the intention of unduly influencing the acts or decisions of the recipient of the benefit.
- Facilitation payments are not allowed, this being understood as such payments, tips or small gifts that have the purpose of expediting or facilitating processes, procedures, registrations or any kind of authorization before the authorities.
- Express absolute rejection of any insinuation, attempt, request or demand of a bribe from an authority, any request in that regard must be declined and reported immediately by the mechanisms made available by Grupo Coppel for this purpose.



ZERO TOLERANCE FOR EXTORTION

Sexual extortion is the use of an hierarchical position or any other form of authority to the detriment of the sexual dignity of another person, in order to obtain an undue benefit or advantage, regardless of gender or sexual identity. Grupo Coppel will resort to all the measures available in its internal regulation and in Mexican legislation for the sanction of extortion, including sexual extortion.



DO NOT ACCEPT BENEFITS FOR IMPROPER PURPOSES

It is understood as a benefit any gift, favor or attention, in cash or kind, directly or through third parties, in that meaning Coppel Group:

- Prohibits its Shareholders, Board Members, Directors and Collaborators from receiving any benefit from its suppliers, with the intention of obtaining an undue advantage.
- Does not permit to offer, promise or grant to any person, company, authority or government official in order to gain an undue advantage.



RESTRICTION ON DONATION FOR POLITICAL PURPOSES

We prohibit making contributions of any kind for political purposes. Contributions, donations, gifts or sponsorships are not authorized for pre-candidates, candidates, political parties, or foundations, associations or companies that are used directly or indirectly as means to raise resources for political purposes.

We promote the free exercise of the civil and political rights of our associates, which must be in a personal capacity.



DONATING EXCLUSIVELY FOR PHILANTHROPIC PURPOSES AND TO CONTRIBUTE WITH THE COMMUNITY

Committed to improving the quality of life of our customers, at Grupo Coppel we make donations solely and exclusively as part of our commitment with the community as a socially responsible company, within the law and without these donations being or being understood as conditioning factor for obtaining any present or future benefit for the giver.



PROHIBITION OF INFLUENCE PEDDLING

Grupo Coppel prohibits the use of influence, economic or political power, real or fictitious, over any government authority, with the purpose of obtaining a benefit or an advantage for oneself or for an external third party, or to cause harm to any person or government official, regardless of the results obtained.



COLLABORATION WITH AUTHORITIES

We respond in a truthful and timely manner to the requirements of any competent authorities request in accordance with their authority, including those related to possible administrative infringement arising from non-compliance with this policy.



BOOKS AND ACCOUNTING RECORDS

The authenticity of our accounting records is an essential value for Grupo Coppel, that is why we avoid any corrupt accounting practice, including fraud. Financial transactions will be identified and recorded in an appropriate manner and in compliance with applicable legislation.



ETHICS AND COMPLIANCE LINE

Grupo Coppel shareholders, directors, collaborators and suppliers must report in good faith those behaviors contrary to this policy, through the formal means available for such purposes.



NON-RETALIATION POLICY

Any retaliation against a person who reports any contrary behavior to this policy or who cooperates with an investigation related to a reported act is prohibited. Any retaliation must be reported to the National Compliance Management, which, after an investigation, will propose to the Ethics and Compliance Committee the disciplinary measures it deems appropriate.



DISCIPLINARY ACTIONS

Failure to comply with this present policy will cause different disciplinary measures, from progressive discipline, temporary suspension or termination of the employment relationship; in the event that the infringement was committed by a third party which maintains a business relationship with any of the Grupo Coppel companies, it will result in the termination of the respective agreement. The foregoing, without prejudice to the corresponding legal actions.



ADHERENCE TO THE ANTI-CORRUPTION POLICY

Grupo Coppel only establishes business relationships with third parties that follow similar policies or adhere to this policy, which will be applicable to all its actions, including with third parties outside of the company. The understanding and acceptance of compliance with this policy will be part of the employment record of all Grupo Coppel employees and directors, and the supervisor of the person hiring the services will be responsible for the enforcement. A certificate of knowledge and acceptance of Grupo Coppel's Code of Ethics, from which this policy arises, will be signed and periodically reinforced through the appropriate training.