

**GRUPO COPPEL
INTEGRITY PROGRAM**

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

GRUPO COPPEL'S THIRD PARTY ANTI-CORRUPTION POLICY

In Grupo Coppel we focus on creating sustainable and long-term relationships with our suppliers and 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 our 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.

For this reason, all suppliers and third parties related to Grupo Coppel are required to comply with the following obligations:

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.



DO NOT ACCEPT ANY BENEFIT FOR IMPROPER PURPOSES.

The receiving, offering, promising or granting of any gift, favor or attention, in cash or in kind, directly or through any third parties, in order to give or gain an advantage is not allowed.



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 as means to raise resources for political purposes.



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.

Keeping the authenticity of our accounting records avoiding any corrupt accounting practice, including fraud. Financial transactions shall be identified and recorded in an appropriate manner and in compliance with applicable legislation.



ADHERENCE TO THE ANTI-CORRUPTION POLICY.

According to our corporate vision of conducting our business with the highest standards of integrity, transparency, responsibility and in strict compliance with the national and international legal framework., we maintain a zero-tolerance position against corruption in any form.

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 any supplier or third party related with Grupo Coppel.

Avenues for Reporting:

In the event of non-compliance by a third party who maintains a commercial relationship with any of the Grupo Coppel companies, it will give rise to the termination of the respective contract. The above, without prejudice to the corresponding legal actions.

We have an open-door policy as avenues for reporting or complaining. The reports may be anonymous and will be handled confidentially by an independent third party.