

# Code of Ethics

■ Code of Ethics

# Letter of Presentation

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The document that you have in your hands and that you are reading at this exact moment is one of the most useful and valuable pieces of communication in any workplace. That's a bold statement, but it is very precise, for the reasons that we will explain below.

In general terms, ethics is a type of "guide for living well," and at Grupo CIE, ethics fulfills that same important function: serving as a guide for the correct behavior of those who are part of CIE. Using this Code, we will be able to act consistently with the values and principles of our organization, supporting the achievement of common objectives, and avoiding problems and setbacks due to a lack of knowledge.

Correct behavior by every individual means correct performance of the organization as a whole. Thus, a code of ethics, and of course the related behavior stipulated in that code, is not just a resource to improve people's existence; it improves the performance of the companies where they work. The latter brings a series of benefits, including a better image and reputation, compliance with laws, a better working environment, and so on.

All of this begins with understanding and implementing our rules about working together. This is why it is so important that we put our Code of Ethics into your hands today.

This is our guide on how to act, and we are obligated to comply with what it states.

We invite you to read it carefully, to reflect on its content, to apply it in your working life, and to talk about it with your family. Don't hesitate to approach your immediate supervisor with any questions you might have, so that he or she can help you resolve it, or find an appropriate solution.

Sincerely,

Alejandro Soberon Kuri  
Chairman of the Board of Directors and CEO of CIE

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# Introduction

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Our Code of Ethics is a fundamental document for those who are part of Grupo CIE, and it is very important for our clients and providers. It contains the main directives regarding the ethical principles to which we must adhere while carrying out all of our activities within the organization.

Every time we act consistently with these guidelines, we reaffirm the basics of our company culture, and we help maintain its good name, backing its image and reputation with clients and the public in general.

The Code of Ethics is a document with corporate reach; in fact, we share, the same values and principles in all of the divisions and companies in our organization. However, it will be applied in accordance with the particular nature and characteristics of each division and company. The Code is to be used by everyone, and no one is granted exclusion by virtue of their hierarchical level, therefore the participation of everyone is required for its fulfillment, as well as to prevent, and where applicable, report deviations.

Compliance with what is stipulated in the Code of Ethics is a responsibility that is shared by everyone who is part of CIE, without exception.

If you have any questions about how to interpret the Code, or if you would like to report an irregular situation or deviation from this Code, go to your immediate supervisor and/or the Conduct Committee, who will give you advice and the necessary support.

## Respecting the dignity of others

### Principles of Behavior

**P**eople are the organization's fundamental, most valuable element. An individual's integrity and growth are priorities for Grupo CIE.

**G**rupo CIE employees relate to others based on fairness, equality of opportunities, and non-discrimination.

**W**e value diverse opinions and points of view, seeing this as something that enriches the dynamics of our work.

#### Relationship with Clients and Consumers

**W**e believe the first sign of respect for our clients and consumers is in offering them the highest-quality services and products.

**I**n our relationships with our clients, as well as the services and products that we make available to them and our consumers, we encourage respect and fair treatment of everyone.

**I**n our relationships with clients and consumers, sexual and emotional harassment are strictly prohibited.

**D**iscrimination due to ethnicity or to a certain social class, belief, sex, age, sexual preference or physical capacity, is strictly prohibited.

#### Relationship with Investors, Shareholders and Partners

**O**ur commitment to Grupo CIE is based on relationships built on honesty and mutual trust.

**W**e guarantee veracity and clarity in the information on our operations.

## Relationship with CIE Employees

**I**n our daily working relationships, we show respect and consideration for others, and we demand the same in return.

**W**e respect the characteristics, beliefs and preferences of each individual, with the only limit being what is best for the whole.

**S**exual and moral harassment are strictly prohibited.

**D**iscrimination due to ethnicity or to a certain social class, belief, sex, age, sexual preference or physical capacity, is strictly prohibited.

## Other Relationships

**O**ur relationships with government authorities are friendly and respectful, we recognize their capacity as an authority, and we strive to have an atmosphere of openness and trust to facilitate approaching issues and reaching agreements.

# 2

## Integrity in our business practices

### Principles of Behavior

**W**e conduct our operations in accordance with the law, honesty and transparency.

**W**e ensure the satisfaction and loyalty of our clients and consumers by providing them with experiences that comply with and exceed their expectations, within the framework of excellent service.

**A**ny use of the organization's or its providers' resources for the unjustified or illegal benefit of others is strictly prohibited and will be punished to the fullest extent.

#### Relationship with Clients and Consumers

**T**he managers and employees who deal with clients must treat them fairly and honestly in every transaction, providing them with the services and products that are appropriate for them, with the greatest quality and opportunity within their reach.

**W**e handle our clients' information with the strictest confidentiality, using that information with the utmost care.

**W**e closely adhere to our internal policies regarding prevention of money laundering, which requires us to be up to date and to report clients who attempt to use our infrastructure for illegal purposes.

#### Relationship with Investors, Shareholders and Partners

**G**rupo CIE will create and distribute the necessary information in a timely and correct manner, in full and transparently, so that our shareholders and partners can make decisions based on consistent, homogenous and known information.

**A**ll of our business operations and practices, and all transactions that we enter into, will be conducted in strict accordance with ethical and legal rules.

## Relationship with CIE Employees

**I**n order to avoid conflicts between personal interests and the interests of the Group, we must immediately inform our supervisor and the Conduct Committee in writing of any interest, financial or otherwise, that might conflict with our work responsibilities.

**N**o employee may have any direct interest or stake in a competing business, provider or client.

**F**amily members of Grupo CIE employees may work within and for the Group as long as their family relationship does not impact their job performance or the working relationship between the employee and the Companies, and written notice of this relationship must be given to the Group's Conduct Committee.

**I**n turn, employees must inform their immediate supervisor, Human Resources, and the Conduct Committee in writing of the existence of any type of family relationship with or between clients, consumers, investors, shareholders, partners, employees, providers, and outside advisers.

**A**ll employees at Grupo CIE, and especially those who are in positions of leadership, must propitiate a satisfactory working environment of respect, trust and candor, promoting learning and the freedom to act, offer opinions and make decisions in their area of responsibility.

**A**s employees of Grupo CIE, we recognize our responsibility to understand and act in strict compliance with the Group's policies and the policies of every business unit, as well as the law, and to report any situation that violates those policies.

**W**e all have the obligation to report the information created by our work, negotiations, etc., honestly, precisely, safely, and in a timely manner. The reports must be an exact reflection of reality, regardless of the destination of the information.

**W**e recognize that it is our responsibility to safeguard the interests and the image of the Group to which we belong, therefore any anomaly must be reported to one's immediate supervisor and to the Conduct Committee.

**T**he consumption of any type of illegal drug by any employee of Grupo CIE is strictly prohibited, as the Group has a zero tolerance drug policy. The consumption of alcohol during the workday is strictly prohibited.

**D**uring work-related activities, we avoid getting involved in situations that might cause conflicts of interest between the company and the employees or any related party.

If we conduct business outside of work, especially when it relates to company activities, we must inform our immediate supervisor or the Conduct Committee in writing, in order to avoid conflicts of interest.

We do not accept ostentatious gifts from third parties with commercial ties to the company or people with whom they have matters to resolve. In the event of any doubts, the immediate supervisor or the Conduct Committee must be notified in writing.

The Conduct Committee is the only entity authorized to determine if a gift is ostentatious due to its value, and if that is the case, it will have the authority to send it to Fundación CIE, which will make good use of these resources for the social good.

Employees who have access to information on the Stock Market Law and related provisions must consult with the Finance Division in all matters related to distributing and handling this type of information. This is as established in corporate policy "Poc-Fi-CGF-001-1-CIE Communication with financial groups."

## Other Relationships

Managers and employees who negotiate the acquisition of goods and services for Grupo CIE must offer and demand fair and honest treatment from providers in every transaction, always seeking to comply with the Group's best interests.

Grupo CIE and its employees seek to obtain from the provider only the benefits related to the negotiation itself, without obtaining personal advantages at the cost of signing contracts for the acquisition of goods and/or services, always striving for a win-win situation.

Grupo CIE and all of its members must work at all times with complete transparency with government entities that are duly authorized to request information or to supervise the organization and to act in accordance with the law to defend the Group's legal interests.

Respecting the independence of labor unions within the Group that represent the legitimate interests of the workers is a fundamental commitment of CIE. CIE always strives to have cooperative and mutually beneficial relationships with the unions.

We do not engage in activities that are linked to the company's businesses or to third parties that form part of the sectors that we serve.

At Grupo CIE, we refrain from divulging the problems or weaknesses observed at another provider to providers or other people outside of the Group.

# 3

## Creating value in everything that we do

### Principles of Behavior

**W**e add value to the processes in which we participate.

**O**ur decisions and activities follow profitability criteria.

**W**e use the organization's resources responsibly, to minimize costs and to maximize results.

**W**e are always striving to consolidate the organization's long-term competitiveness.

#### Relationship with Clients and Consumers

**O**ur clients are our strategic allies and are key to creating value, thus we always seek to establish mutually beneficial relationships.

**W**e seek to continuously increase the organization's business volume, securing our leadership as a result of continuous improvement in everything we do, and providing our clients with increasingly better service.

#### Relationship with Investors, Shareholders and Partners

**A**t Grupo CIE, we are committed to sustainably providing reasonable profitability to our shareholders and partners.

## **Relationship with CIE Employees**

**W**e work in a team to create value because we know that the sum of the efforts of all members of Grupo CIE adds value to their areas of responsibility, and it has a synergic effect on the entire company.

**W**e make effective and efficient use of the resources for which we are responsible (information, equipment, materials, furnishings, property and financial resources) in order to maximize their productivity and to prolong their useful life.

**T**he equipment, information, resources or materials owned by Grupo CIE will only be used for work-related activities, and not for personal ends.

**W**e are careful only to make necessary expenditures, and not to engage in showy practices that often occur in social or corporate arenas.

**W**e seek to maximize resources, in addition to promoting financial savings at all times in operations, launches, promotions and businesses, thus spreading a message of austerity and sobriety in order to prevent unnecessary expenses.

**I**n our day-to-day activities, we promote a culture of high performance with exceptional professionalism in attaining the goals we seek to reach.

## **Other Relationships**

**G**oods and services will be acquired through homogeneous and transparent processes that ensure the fair participation of providers and an impartial selection of providers, based on the criteria of quality, profitability and service.

# 4

## Respecting the laws, values and customs of the communities where we operate

### Principles of Behavior

**I**n all of our activities, we act in strict compliance with legal provisions.

**W**e respect the values of the communities where we do business, and we try to find out about and understand the local customs in order to conduct ourselves accordingly.

**W**e actively support the organization's good name and reputation.

#### Relationship with Clients and Consumers

**A**ll of our relationships with clients must be in strict compliance with the law. We actively seek to maintain relationships only with those whose reputation matches the high ethical standards that we demand.

**W**e seek to understand the values and customs of the groups to which our consumers belong so that we can be reasonably sure that we are acting respectfully at all times in the services and products we offer them.

#### Relationship with Investors, Shareholders and Partners

**A**ll of our relationships with investors, shareholders and partners are based on transparent and honest communication, strictly adhering to the law.

**W**e maintain a strict policy of association and equity ties only with partners and shareholders that do not engage in illegal activities.

## **Relationship with CIE Employees**

**B**oard members, managers and employees at Grupo CIE must comply with applicable laws and regulations when performing their activities.

**T**he company respects the religious and political convictions and preferences of each individual, as long as they do not interfere with work-related activities, thus proselytizing is strictly prohibited in work situations.

**W**e must all report any illegal situation or situation that might be dishonest, which could compromise the integrity of Grupo CIE.

## **Other Relationships**

**A**ll agreements, processes and relationships that the company has with government agencies or employees must be carried out in strict accordance with applicable laws.

**W**e work to provide the greatest transparency in all the information that is generated and reported to government entities.

**W**hen we act on behalf and in representation of the company, we do not make or authorize bribes that contravene the rules in effect and our ethical principles. In the event of questions, you should speak with your immediate supervisor or the Conduct Committee.

# 5

## Personal commitment

### Principles of Behavior

The relationship of members of Grupo CIE with the organization is based on a commitment to focus on results, dedication to and identification with the culture, and the organization's objectives.

We recognize the talent of our managers, fellow workers and employees, as well as the talent of our clients and providers, and we are aware that our achievements are the result of teamwork.

We encourage maintaining a healthy and safe working environment, which aids personal and professional development.

#### Relationship with Clients and Consumers

We assume a personal commitment to ensure the quality of attention that we provide to our clients, as well as the quality of products and services that we offer to our consumers.

With our personal behavior, we seek to reaffirm to our clients and consumers our reputation of being an honest, serious and trustworthy company.

#### Relationship with Investors, Shareholders and Partners

Our commitment is to protect and optimize the value of the investment, mainly through the prudent and profitable use of the resources in our care.

## **Relationship with CIE Employees**

**E**very day we work to make our workplace an increasingly better place, assuring quality in all of our activities, processes, services and products.

**E**veryone at Grupo CIE must act fairly and equitably, protecting the interests of the Group and the common interests of the employees.

**A**s employees of Grupo CIE, we recognize our responsibility to understand and act in strict compliance with the Group's policies and with the policies of every business unit.

**E**ven outside the workday, we recognize our responsibility to safeguard the Group's image inside the Group's facilities or at any event, not taking undue advantage, but respecting the operation of the property, without receiving any type of privilege whatsoever.

**W**e actively safeguard the good name and image of Grupo CIE and each of the companies that comprise it.

**W**e do not express opinions or release information that might put the safety and/or good name of Grupo CIE at risk.

**I**f a direct family member of any employee at Grupo CIE provides services to the company, this must be reported in writing to the employee's direct supervisor, the head of Human Resources, and the Conduct Committee. Further, in accordance with the rules in effect, direct relatives may not work in the same Division or with the same direct line of report.

**A**ll members of Grupo CIE are committed to our personal development and to the development of the personnel who report to us, seeking and creating an environment that promotes continuous learning.

## **Other Relationships**

**W**e always encourage frank, open and timely communication with providers, authorities and members of the communities in which we operate, in order to build healthy and productive relationships.

**T**he employees at Grupo CIE who represent unions will seek to protect the collective interests and the common good above their own personal interests at all times.

**W**ithin the Group, it is our commitment to respect the independence of the labor unions with which we have relationships and that represent the legitimate interests of the workers, always striving to have cooperative and mutually beneficial relationships.

# 6

## Social responsibility

### Principles of Behavior

We are actively committed to the well-being of the communities in which we operate.

We support at-risk groups in society through Fundación CIE.

We seek to involve our business partners in our social responsibility initiatives.

#### Relationship with Clients and Consumers

We prefer to establish business relationships with socially responsible clients.

We are proud to be an organization that is committed to improving the living conditions of at-risk groups, and we let our clients and consumers know this.

#### Relationship with Investors, Shareholders and Partners

We back our business partners' social responsibility initiatives.

#### Relationship with CIE Employees

We get involved in the social responsibility initiatives of Grupo CIE, safeguarding the Group's image in everything we do.

The employees of Grupo CIE are invited to participate in social responsibility activities through Fundación CIE, and we can choose the degree to which we commit ourselves to those initiatives.

#### Other Relationships

We prefer to maintain business relationships with socially responsible people and companies.

# Conduct Committee

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The Conduct Committee is an entity within the Group that is comprised of representatives from the areas of Human Resources, Internal Audit, and the Corporate Division of Administration and Finance. It is responsible for receiving reports on violations to CIE's Code of Ethics, and where applicable, for objectively applying the appropriate punishments, based on clear and defined criteria, seeking fairness at all times.

- The responsibilities of the Conduct Committee are the following:
- To review the content of the Code of Ethics at least every two years, and to update it when required.
- To cooperate with the Corporate Division and with the corresponding areas in distributing the Code of Ethics, and particularly in the processes that seek to ensure that its content is understood and that it is applied in the daily working life of Grupo CIE employees.
- To cooperate in promoting the understanding, acceptance and application of the Code of Ethics among the organization's different interest groups. shareholders, clients, providers, and members of the government and the communities in which we operate.
- At least every two years, to evaluate observance of the contents of the Code of Ethics, both among those within Grupo CIE, as well as the members of the company's interest groups.
- To distribute corporate policy in relation to the reporting system among personnel, through the means established in that policy.
- To assess situations related to alleged violations to the principles and provisions of the Code of Ethics, to report on and where applicable, to propose the punishments to be applied.
- To receive, analyze and register the suggestions, comments and denouncements that are sent to the Code of Ethics mailbox, which is on the Intranet (Communication Portal - Code of Ethics), or to the e-mail [codigo\\_etica@cie.com.mx](mailto:codigo_etica@cie.com.mx), and to ensure that an appropriate response is given to each and every communication.