



ANTI-CORRUPTION MANUAL

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1. OBJECTIVE

This Anti-Corruption Policy in **FINMEC GROUP** derives, in general, from the Code of Ethics and Conduct, here-in-after the "Code", which establishes the basis of action and guidelines of conduct that must be observed by shareholders, directors, officers, employees and associates of whom will be identified for the purposes of this document as "the Company", in the performance of assigned functions and / or related activities.

The ethical principles of the Code include: compliance with rules, laws and regulations; liability; respect for the dignity of persons; value creation; solidarity; rationality; respect; honesty and unity.

The Company opposes corruption and bribery and does not admit or permit practices aimed at conducting business through improper means. The Code is specific in the prohibition of corrupt conduct such as: making contributions of a political nature; make payments or loans from corporate, subsidiary or personal funds; give anything else of value to a government or private official or employee or any person, with the purpose of obtain, maintain or prosecute business or business relationships for the Company, in any of its subsidiaries or affiliates; offer to persons or entrepreneurs, nor receive or accept from them, any type of benefit that may jeopardize the ability of the Company to make objective and equitable decisions.

The Company's Anti-Corruption Policy is linked to the proper functioning of the Internal Control System that the Company permanently builds based on the Objectives and Guidelines of the Internal Control System, hereinafter the "OLSCI". The components of the Internal Control System, defined in the OLSCI, contemplate a control environment that considers integrity and ethical values, as well as the culture of risk management, among other factors. One of the objectives of the Company's Internal Control System is the generation of complete, complete, correct, accurate, reliable and timely financial and management information, which allows for appropriate decision-making and reliable disclosure of information to both corporate governance bodies, interested third parties (investors) and the competent authorities.

The Company's Anti-Corruption Policy aims to:

1. Publicize the applicable external and internal regulatory provisions.
2. Promote and strengthen the development of mechanisms to prevent, detect, punish and eradicate corruption.
3. Avoid damage to the image, reputation and prestige of the Company.
4. Avoid the loss of integrity and independence in the placement of consumer credits and in other types of products, operations and services authorized to the Financial Institutions of the Company.

2. SCOPE

This Policy is mandatory for all shareholders, directors, officers and employees of the Company and its subsidiary companies, as well as for all personnel assigned to the administrative and operational areas, including corporate offices and those located in the interior of the Mexican Republic. The holders of the different Directorates of the Company and its subsidiary companies or equivalent position are responsible for its dissemination among the personnel under their charge and is part of the permanent instruments of work of each area. The criteria and guidelines that are expressed are of an internal nature.

3. REFERENCES

National legislation

- I.** Federal Criminal Code.
- II.** Federal Code of Criminal Procedure.
- III.** Commercial Code.
- IV.** Federal Tax Code and its Regulations.
- V.** Income Tax Act.

- VI.** General Law on the National Anti-Corruption System
- VII.** General Law on Administrative Responsibilities

International legislation

- I.** International Anti-Bribery and Fair Competition Act. (Ley Anti-Soborno Internacional y de Justa Competencia).
- II.** Foreign Corrupt Practices Act. (Foreign Corrupt Practices Act).
- III.** Norma ISO Standards 37001 Anti-bribery management systems

4. DEVELOPMENT

PROHIBITIONS

The Company, shareholders, directors, directors, officers, employees, distributors, commission agents, promoters or business associates, are prohibited from:

- 1.** To give or offer money or any other gift to a public servant or to an intermediary person determined by him, so that said public servant may do or omit a just or unjust act related to his functions.
- 2.** Offer, promise or give, by himself or through an intermediary person, money or any other gift, whether in goods or services to a foreign public servant or to a third party determined by him, so that said public servant manages or refrains from managing the processing or resolution of matters related to the functions inherent in his employment, position or commission.
- 3.** Offer, promise or give, by itself or through an intermediary person, money or any other gift, whether in goods or services to any person to go before a foreign public servant and require or propose to carry out the processing or resolution of any matter related to the functions inherent to employment, position or commission of the latter.

4. Accept or receive, directly or indirectly, bribes, incentives, gratuities, compensations, aid or support from customers, suppliers, distributors, commission agents, partners or other person or entity that has a relationship with the Company, in order to obtain benefits from the functions inherent in their employment, position or commission.

MECHANISMS TO PREVENT AND DETECT CORRUPTION

To comply with the objective of preventing and detecting acts of corruption that may occur within the Company, it is necessary to implement internal controls and compliance programs, with the support and energetic, explicit and visible commitment of the Board of Directors, the directors and the General Management, with the following characteristics:

The internal controls and compliance programs for the detection and prevention of corruption will be applicable to the directors, officers and employees of the Company and will include, among others, the expense and accounting record of:

- I.** Gifts and gifts.
- II.** Representation costs;
- III.** Travel expenses;
- IV.** Grants and fellowships;

The maximum monetary value for the concepts set forth in the previous paragraph must be stipulated and/or reviewed annually by the Executive Committee, making it known to shareholders, directors, directors, officers, employees, distributors, commission agents, agents or intermediaries and business associates. None of them may be offered, received or disbursed in connection with the acts of corruption described in the Prohibitions section.

3. The Anti-Corruption Policy, internal controls and compliance programs for the detection and prevention of corruption, applicable to the Company, shall apply to third parties, such as agents and other intermediaries, consultants, representatives, distributors, contractors, suppliers and business partners, within the contracts that are

concluded, especially for contracts that are concluded with third parties that may have dealings with public servants, foreign public servants, political parties or candidates.

4. The system of internal accounting controls shall provide reasonable assurance that the books, records and accounts are correct and accurate and that they may not be used for the purpose of carrying out or concealing acts of corruption. No one shall circumvent the system of internal accounting controls or cease to implement it, or falsify any book, record or account. In accordance with the Code of Ethics and Conduct, the Company applies the highest standards when it comes to the recording of information. All financial statements, books, records and accounts of the company (electronic or printed) shall accurately reflect operations and events and comply with both legal requirements and internal and external reporting standards. The issuance of false reports within the Company is strictly prohibited and will be penalized.

When the Company holds 50 per cent or less of the voting power with respect to a domestic or foreign enterprise, it shall proceed in good faith to use its influence, to the extent reasonable under the circumstances, to have such domestic or foreign enterprise develop and maintain a system of internal accounting controls consistent in terms of the preceding paragraph.

When the Company acquires an entity, it must implement compliance with this Anti-Corruption Policy, internal controls, compliance programs for the detection and prevention of corruption, as well as the system of internal accounting controls, in order to standardize the performance of the acquired entity with the Company.

Permanent internal and external communication programs will be carried out, as well as training for all levels of the Society, in order to disseminate the Code of Ethics and Conduct, the Anti-Corruption Policy and internal controls and compliance programs to prevent and detect corruption.

For the detection of corrupt acts, reviews will be carried out within the Society. Evidence of corruption is generally detected in a similar way to evidence of fraud.

Some examples of corrupt payment methods are:

- I.** Use of shell companies to make or receive payments;
- II.** Donations to non-profit enterprises constituted by public servants;

- III.** Payments sent to tax havens;
- IV.** Payments to trade unions;
- V.** Payments of inflated invoices or for services not received;
- VI.** Direct payment of bills for political campaign expenditures;
- VII.** Payment of travel expenses for public servants;
- VIII.** Payment of inflated payroll with fictitious employees, with employees of political campaigns or with public servants.
- IX.** Granting of credits to public servants or their families under exceptional conditions.

The most important thing in the detection and prevention of corruption, as well as fraud, is the denunciation of the company's employees. Any person who knows of the performance of a corrupt action within the Company must make their complaint. To this end, the Company's management undertakes to protect the employees who make the complaint and not to retaliate against them. In any case, the complaint can be made anonymously, as well as for violations of the Code of Ethics and Conduct. For this, voicemail (report line) is available on the phone +52 618-135-6747, in the City of Durango, Durango, available at any time of the day.

CONSEQUENCES AND SANCTIONS

- 1.** Failure to comply with the provisions of the Anti-Corruption Policy may cause economic and moral damage to the Company, affecting its image, reputation and prestige, both domestically and abroad.
- 2.** The employment relationship will be terminated to the directors, officers and employees who are responsible for any breach in this Policy in accordance with the provisions of the Code of Ethics and Conduct. On the other hand, it is the obligation of the Company and its subsidiary companies to make the corresponding criminal complaint.

- 3.** The natural or legal person who is responsible for the breach of the provisions herein must cover the damages caused, including moral damage, at the national level or abroad, regardless of the legal sanctions to which it is credited.
- 4.** Legal sanctions may imply for natural persons the imposition of fines and imprisonment if the crime of bribery is configured in Mexico and fines and imprisonment in the United States of America for violations of the Foreign Corrupt Practices Act; fines to natural persons may not be covered by undertakings. For the Company or other legal entities, legal sanctions may involve the imposition of fines and the decree of suspension or dissolution if the crime of bribery is configured in international transaction in Mexico and fines in the United States of America for violations of the Foreign Corrupt Practices Act of up to 2 million US dollars plus an additional fine for the benefit obtained as a result of the action of corruption; the U.S. government may suspend the right of legal entities to conduct business with the federal government of the United States of America and suspend their participation in the securities market.

The following are perpetrators or participants in the crime:

- I.** Those who agree or prepare its realization;
- II.** Those who do it by themselves;
- III.** Those who do it jointly;
- IV.** Those who carry it out using another;
- V.** Those who intentionally determine another to commit it;
- VI.** Those who intentionally render aid or assist another for their commission;
- VII.** Those who, after their execution, assist the offender, in fulfillment of a promise prior to the crime;
- VIII.** Those who, without prior agreement, intervene with others in their commission, when the result that each one produced cannot be specified.