



*¡por sabor!*<sup>®</sup>

## Anti-Corruption Policy



# Introduction

**Corruption is equivalent to a series of criminal offenses**, which may give rise to strict penalties on the company and the involved associates, who may also be subject to disciplinary measures.

The policy of Conservas La Costeña® regarding corruption is clear: **Offering, paying, authorizing, requesting, or accepting bribes of any kind will not be tolerated.**

The success of La Costeña® is based on its reputation of business integrity and earnestness built over the years.

The benefits stemming from a business improperly obtained will lose all its value compared to the damages to the commercial purposes and reputation of La Costeña®.

Reading and understanding this policy is important for associates to comply with and fulfill the spirit and contents of the principles and procedures described in this document, when acting on behalf of Conservas La Costeña®, in all jurisdictions.

Any questions on the implementation, or on any current or future suspected violation, of this policy or the anti-corruption laws must be submitted or notified directly at our Ethics Reporting System.

## Purpose

To help minimize that corruption-associated facts, misappropriation of assets and fraudulent acts occur at Conservas La Costeña®.



## Scope

This policy applies to all employees, customers, providers and third parties associated to Conservas La Costeña®.



# General Anti-Corruption Policy

At La Costeña® we do not accept any bribery act. Therefore, we do not take or give money or gifts in order to achieve personal or business benefits contrary to law.

Paying bribes, or taking money, gifts, or kickbacks to achieve the above-mentioned benefits affect the results and reputation of the company, and also of our associates. Those actions are illegal and may give rise to a variety of sanctions, even of a criminal nature.



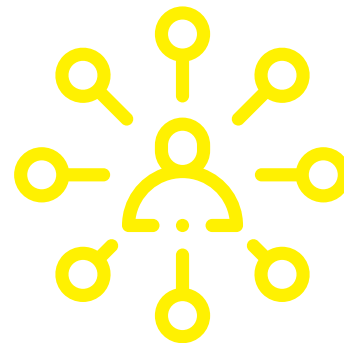
# Purchases and Contracting

No associate may request or accept any financial or any other advantage, as an incentive or compensation for his performance related to purchases or contracting decisions.



# Trading in Influence

La Costeña® prohibits trading in influence, or using economic or political power on any government officer, in order to obtain an improper benefit for the company.



## FRAUD

It is strictly forbidden to deceive any person to achieve an economic benefit, with the ensuing damage to that person, whether acting in the name of La Costeña® or in his own capacity.



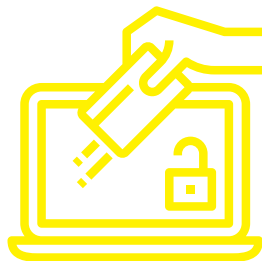
## BRIBERY

Associates of La Costeña® must never request, accept, offer, provide, or authorize kickback of any kind, or anything that may be interpreted as a bribery conduct, whether directly or indirectly.



## THEFT

Associates must be respectful of the assets and rights the property of La Costeña®, and also of their colleagues and third parties related to the company.



## GIFTS

Gifts to circumvent implementation of the law are strictly prohibited. Anyone making use of this resource will be subject to administrative sanctions or to termination of employment and/or of business relationship, and to the applicable legal or criminal actions.



## ECONOMIC EXTORSION

Associates of La Costeña® will refuse any direct or indirect extortion request.

However, in the event any extortion or presumed extortion exists, associates must immediately report it to the Ethics and Conduct Committee.



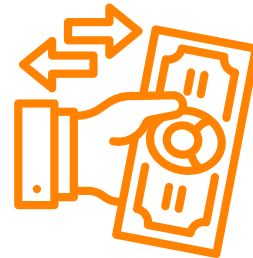
## CHARITABLE DONATIONS

Charitable donations eventually given by La Costeña® are strictly offered for non-profit purposes, and to the benefit of fully justified social causes, and meeting the applicable laws. Consequently, no donation provided by the company may be associated with any political campaign.



## IMPROPER USE OF THE COMPANY'S FUNDS

It will not be tolerated any conduct whereby associates misappropriate or improperly use or deviate funds owned by the company.



## GIFTS

It is prohibited to give or receive anything of value aimed at inducing a person or executive to use his position to provide any advantage in his business relationship with La Costeña®.

The gifts received by associates of La Costeña® due to Christmas-New Year's celebrations may be accepted, as long as the organizational Department the associate belongs to, or the company's President, as applicable, is informed of those gifts before they are accepted.



## MEALS, TRAVEL AND ENTERTAINMENT FOR BUSINESS PURPOSES

Meals, travel, lodging, tickets to events, and all hospitality for business purposes, are things of value if provided and received without taking into consideration the L DRG-01 Comprehensive Policy of Authorization Levels and Delegation of Authority currently in effect, and may be deemed as bribery and corruption acts.

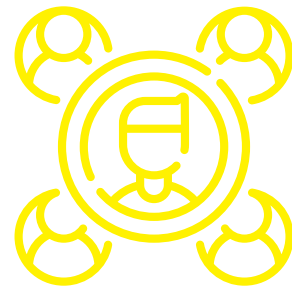


## BOOKS, ACCOUNTS AND RECORDS

It is strictly forbidden to falsify, amend or tamper documents, information or reports for internal or external use, in a personal capacity or in the name of the company.

## CONFLICT OF INTEREST

Associates must not take advantage of business opportunities offered by La Costeña® that may allow them to gain revenues from third parties. No provider must have any degree of kinship, family relationship, bond relationship of friendship with company employees who have the authority to make decisions on the selection and contracting of goods and services, except for those authorized and documented with the Senior Management.



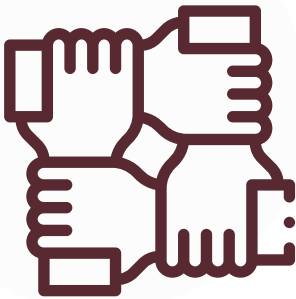


# Actions to fulfill this Policy

Any violation of the anti-corruption laws can have serious consequences for the company and associates, including fines and judgments with prison sentences. Additionally, if any associate fails to meet this policy, the consequence can be that disciplinary actions will be applied including termination of employment.

## WORK ENVIRONMENT

La Costeña® develops and is part of a community in which an environment of mutual respect, trust, and affection, solidly built on the moral standing of its associates, is the fundamental factor for personal relationships, in which its directors, managers, deputy managers and heads must be leaders and examples to others.



## ACCOUNTABILITY

The Ethics and Conduct Committee is the body in La Costeña® in charge of presenting to the Senior Management the report describing the conducts contrary to this policy that may damage the company and its associates' reputation, and also of deciding the actions to be taken.



# Actions to fulfill this Policy

## AUDITING

Periodic and surprise audits are carried out on La Costeña® processes to verify compliance with its policies and procedures in effect.

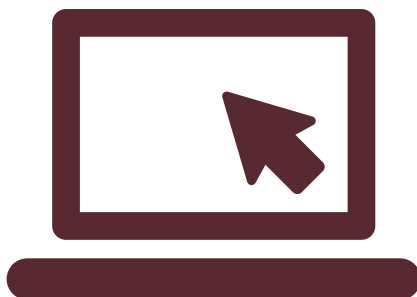


## SANCTIONS DUE TO BREACH

Any breach of this policy will be penalized in accordance with provisions in the internal work rules. Such penalties range from a verbal and/or written wakeup call to termination of employment or of a business relationship, the latter with customers and providers, and also any applicable legal actions.

## ETHICS AND CONDUCT COMMITTEE

It is the multi-disciplinary body at La Costeña® responsible for enforcing and performing the Code of Ethics and Conduct in this Policy.



## ETHICS REPORTING SYSTEM

It is the proper electronic mean for reporting in writing all conducts that go against the Code of Ethics and Conduct, and this Policy.

**Conservas La Costeña, S.A. de C.V.**

<https://www.lacostena.com.mx/es/>

**ETHICS REPORTING SYSTEM**

<http://denuncia.lacostena.com.mx/>