

FEMSA Corporate Policy

Anti-corruption

July 2024



FEMSA

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	Date Approved: January 2017	Last Revision Date: July 2024

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Scope

This FEMSA Corporate Policy is of mandatory observance and compliance for FEMSA and all of its Employees.

The Anti-corruption regulatory framework applied to suppliers is contained in the FEMSA Supplier Guiding Principles, which were developed based on the FEMSA Code of Ethics and Corporate Policies.

Policy

At FEMSA, we conduct business practices in accordance with the law, in an honest and ethical manner, with zero tolerance for Bribery, rejecting, reporting, and fighting any act of corruption and extortion.

1. To ensure compliance with local laws and regulations in the countries where we operate, we carry out fair and transparent business practices and prevent and discourage Bribery and extortion.
2. We reject any kind of Bribery of Public Officials.
3. As Employees, in our activities inside and outside FEMSA or on behalf of FEMSA, either directly or through a third party, we do not participate in acts of corruption, therefore:
 - a) We do not order, authorize, or promise to engage in corrupt practices,
 - b) We do not induce anyone to engage in corrupt practices, and
 - c) We do not conspire in their performance.
4. We ensure that relations with external agents, suppliers, consultants, Public Officials and other Intermediaries are always justified in terms of business and are conducted exclusively on the basis of respect, honesty, integrity, transparency and professionalism.
5. In our Contracts we set forth anti-corruption clauses to prohibit corrupt acts and illegal practices, as well as to require compliance with all applicable laws to our Third Parties with whom we interact. We may conduct more detailed audits/reviews of

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external agents, suppliers, consultants and other Intermediaries with whom we interact, and who are considered high risk according to the Internal Guidelines. In case of any suspicion of non-compliance with the law, including acts of corruption, FEMSA's Chief Legal Compliance Officer or the Compliance Officer of the corresponding Business Unit is immediately notified.

6. We do not authorize compensations to Third parties if there are signs or the appearance that a Bribe will be paid to a Third party, or by such Third party.
7. We establish controls so that no money, Gifts, advantageous conditions, salaries, trips, commissions, or Anything of Value is directly or indirectly, received, given, paid, offered, promised or authorized in the name of FEMSA or in a personal basis to obtain any **Undue Advantage or Benefit** of any kind. All Gifts, hospitality, travels, or Entertainment must comply with the corporate standard established for that purpose.
8. We do not make donations (including sponsorships), either in a personal basis or on behalf of FEMSA to obtain or retain business or to gain an **Undue Advantage or Benefit** to the company. Any contribution that FEMSA makes must be permitted under applicable law, made to a community or organization acting in good faith and in accordance with the Internal Regulations established to make Donations. A detailed review must be carried out by FEMSA's Legal Department or the Legal Department of the corresponding Business Unit to confirm that the donation complies with the laws and criteria established for the granting of donations and does not directly or Indirectly benefit a Public Official.
9. Political contributions made by us must not be made in exchange for obtaining an **Undue Advantage or Benefit** and must be made in accordance with the requirements established by local laws in the countries in which we operate, as well as with established internal procedures.
10. We maintain control systems and accounting and administrative recording procedures to prevent and detect illicit payments or payments of a corrupt nature. All payments and transactions are recorded in a complete, correct, and timely manner.
11. Prior the acquisition of an interest in a Third party, by means of a partnership, merger or acquisition, we ensure and document that the Third party generally complies with this policy prior to its acquisition.

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12. We establish and carry out training and communication plans, under the responsibility of the Chief Legal Compliance Officer FEMSA or the Compliance Officer of the corresponding Business Unit and with the support of Human Resources from the corresponding Business Unit, aimed at preventing and raising awareness of acts of corruption to guarantee a culture of compliance with the law.

Definitions

For the purposes of this Corporate Policy, the following terms will have the meanings established herein, both when used in singular or plural.

Anything of Value, includes any type of tangible or intangible benefit that has value for the individual, the Public Official, including his relatives, companies, affiliates, friends or other entities linked to him/her, for example: cash, contributions in kind, product, cash equivalents (gift cards, etc.), advantageous conditions, gratuities, bonuses, discounts, favors, benefits, salaries, commissions, loans, gifts, prizes, food and beverages, political contributions, donations (institutional or charitable), offers of employment, promises of future employment, any type of concession in a contract, product or service, or any other form of compensation.

Board of Directors, the Board of Directors of FEMSA.

Bribery, is any payment, delivery, offer, promise or authorization, directly or indirectly, of any amount of money, Gifts, services, travel, commissions or Anything of Value, to any private individual, Public Official or equivalent (including Relatives), to obtain an Undue Advantage or Benefit.

Business Unit, business segment with its own objectives that groups several companies controlled by FEMSA. Business serving other segments of FEMSA's business are considered as Business Unit.

Employees, unionized and non-unionized workers in FEMSA's companies.

Entertainment, artistic, cultural, recreational, sporting, and musical events, including, but not limited to, passes and tickets, among others.

Ethics Committee, a body formed by a representative of Human Resources, Internal Audit, Legal, Finance and the Chief Legal Compliance Officer FEMSA or the Compliance Officer of

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the corresponding Business Unit, which ensures compliance with FEMSA Code of Ethics, ensures the dissemination, understanding and use of both FEMSA Code of Ethics and FEMSA Ethics Line and guidance in dealing with reports, questions and concerns received in the Ethics Line.

FEMSA, Fomento Económico Mexicano, S.A.B. de C.V. including all its Subsidiaries.

FEMSA Code of Ethics, a document that contains FEMSA’s ethical principles, unifies criteria and establishes a common reference framework that gives direction for acting in an integral manner, it is also a useful work tool that guides correct and value-driven decision-making.

FEMSA Ethics Line, is the formal mechanism that is used by Directors and Employees, as well as by Third Parties with whom FEMSA has any relationship in the development of its operations, to report any non-compliance and/or possible risk of non-compliance of FEMSA Code of Ethics, FEMSA Corporate Policies, and other Internal Regulations, as well as to address any doubts or concerns.

Gift, is Anything of Value, tangible or intangible, that is given free of charge to one or more people or organizations.

Indirectly, the use of any means, mechanism or person to carry out a conduct, including through outside agents, consultants, advisers or any other type of intermediary.

Internal Regulations, FEMSA Code of Ethics, FEMSA Corporate Policies, corporate standards, corporate procedures, operating policies, operating standards, operating procedures, work regulations, and any other internal document authorized by management to have such effect.

Public Official, includes, but is not limited to, any person who holds a job, position or commission in:(i) any branch, level or constituency of government (including the legislative, executive or judicial branches, whether at the municipal, state, federal or national level); (ii) an autonomous public body; a company with state participation; (iv) a public international organization; or (v) a political party. Said term also includes any candidate for public office.

Third Parties, it means any natural or legal person who is not part of FEMSA and who has or intends to have a commercial or contractual relationship with FEMSA, excluding final consumers and candidates for Employees.

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Undue Advantage or Benefit, any benefit or favorable situation improperly sought, obtained or withheld through the action, intervention or omission of a private individual or Public Official.

References

To complement compliance with this Corporate Policy, Employees must also consult the following Internal Regulations:

[Code of Ethics](#)

[Supplier Guiding Principles](#)

Report

Any non-compliance or possible risk of non-compliance with legal provisions, the Code of Ethics and other FEMSA Internal Guidelines must be reported to the FEMSA Ethics Line, the Ethics Committee or the Human Resources area of the Business Unit.

Corrective measures

The non-compliance of this Corporate Standard will be subject to corrective measures. The severity of such measure will depend on the seriousness and impact of the non-compliance, which may include the Employee dismissal, regardless of filing a complaint with the competent authorities, as the case may be, in accordance with the applicable legislation.

When there is any doubt about the existence of a breach of this Corporate Standard, the corresponding Ethics Committee will proceed to assess whether the breach materialized and, where appropriate, to validate and assess the seriousness and impact of the breach in accordance with the available evidence before the corrective measure is imposed to the potential offender.

With the organizational support that is deemed necessary, the corrective measures will be determined and applied in accordance with the procedure established by the FEMSA Ethics Committee.

If a breach occurs or is presumed to occur, it must be reported immediately through the FEMSA Ethics Line.

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Approval, compliance and updates

This document has been approved by FEMSA’s CEO and by the Business Units’ CEOs.

The functional areas responsible for the anti-corruption risks at FEMSA and its affiliated businesses are tasked with:

- Ensuring the application and compliance of this corporate policy,
- Establishing necessary controls and continuously monitoring them to prevent any risk of non-compliance, and
- Reviewing and, if necessary, updating this corporate policy to ensure its relevance considering the diverse situations within our business and the environment in which we operate.

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