

**GRUPO COPPEL
INTEGRITY PROGRAM**

**GRUPO COPPEL'S
GIFTS AND
HOSPITALITY
POLICY**

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This policy establishes prior approval and record keeping requirements for the giving or acceptance of gifts, invitations and/or travel, in order to avoid any real or apparent conflicts of interest. These requirements are mandatory for Shareholder, Board Members, Directors, Associates and external third parties contractually related to any of Grupo Coppel's companies.

OUR POLICY ON GIFTS AND HOSPITALITY INCLUDES:



RECEIVING GIFTS

When an employee is offered or accepts a gift, meal, invitation or hospitality, the following must be verified:

- The maximum amount allowed for acceptance of gifts will be the equivalent of 1,000 Investment Units in effect on the date of receipt of the gift, accumulated in a calendar year.
- Gifts shall be accepted on behalf of Grupo Coppel, therefore it is prohibited to accept or receive gifts related with the spouse, relatives or friends of the employee who receives them or that are not related to the employee's job responsibilities.
- They shall be accepted in good faith and free of charge, for example., without being influenced by doing or not doing activities related to the responsibilities of the collaborator who receives them in favor of Grupo Coppel companies and without this affecting business decisions. For this purpose, Grupo Coppel's Shareholders, Board Members, Directors and Employees must inform that this gift, present or hospitality will not condition Grupo Coppel's decision-making, in accordance with the provisions of our Code of Ethics.
- Under no circumstances gifts will be accepted from persons or companies that are in the process of becoming suppliers of Grupo Coppel.
- Once the gifts have been received, the Gift Receiving Protocol must be followed, which will be carried out by the Administrative Management Office.



RECEIVING AND OFFERING MEALS

As long as they comply with Grupo Coppel's Code of Ethics and Anti-Corruption Policy, Grupo Coppel employees may offer or receive free meals for institutional purposes, in order to generate and maintain cordial business relationships with third parties in the different business units, keeping administrative and tax records, taking into consideration the following:

- That they are granted in good faith, not as an intention of bribery, payment or commission of any kind to obtain an undue benefit, present or future, or generate the impression or implicit obligation that the person granting them is entitled or claiming preferential treatment. For this purpose, Grupo Coppel's Shareholders, Board Members, Directors and Employees must inform that this gift, present or hospitality will not affect Grupo Coppel's decision-making, in accordance with the provisions of our Code of Ethics.
- Meals must be paid by Grupo Coppel representatives when there are potential suppliers.
- Receiving or giving alcoholic beverages with meals is not allowed.



RECEIVING INVITATIONS TO EDUCATIONAL EVENTS

- Invitations of any kind or location, to courses, workshops or conferences of a curricular nature offered to our employees from suppliers or institutions, must be reasonably related to an academic, commercial or institutional purpose for Grupo Coppel, always in order to develop skills and knowledge on specific topics related to the performance of the functions of the person attending.
- Invitations during vacation periods and in company of relatives or friends of the Director or Employee are not allowed.
- Invitations may not be accepted prior to or after a negotiation or bidding process, or when a procedure is underway with any public institution, whether domestic or foreign.



TRAVEL ARRANGEMENTS

Traveling should be made only for business purposes, only for the strictly necessary time and without extending hospitality beyond what is necessary, avoiding at any time the invitation of other employees not related to the business process, relatives or friends of the latter. Entertainment and/or fun trips should be avoided.



GIFT DELIVERY

Employees shall offer gifts in good faith special but never with the intention of influencing another person to engage in dishonest conduct, or to generate an undue advantage, it must be reported to Grupo Coppel National Compliance Management, and authorized by the Ethics and Compliance Committee taking into consideration the following:

- The maximum amount accumulated in a calendar year for the granting of gifts will be the equivalent in Mexican pesos of 160 Investment Units for each recipient.
- The gifts offered must comply with the provisions of Grupo Coppel's Anti-Corruption Policy.



PROHIBITED PRACTICES

It is prohibited to receive or offer the following kind of gifts, meals and/or travel:

- Cash or equivalent ways of payment such as certificates, gift cards, e-wallets or cryptocurrencies.
- Offering or receiving personal favors.
- Payment of personal expenses.
- Gifts to the Director of the Business Unit for personal matters, weddings, birthdays, baptisms, graduations or holidays.
- Attending supplier events that are not strictly related to the Grupo Coppel business.
- Invitations, meals, hospitality or any courtesy that, due to their time or location, put at risk the integrity or honorability of the attendees or the company they represent.
- Invitations to casinos or any gambling games or places.
- Invitations to adult events that include obscene acts contrary to moral and/or good customs.
- Accepting any benefit that could reasonably compromise the judgment or unduly influence the decision making of the recipient.
- Goods or services considered as prohibited by national or international laws in force.
- Any hospitality or courtesy that could be excessive or luxurious in the context of the business or training situation.

The person receiving the gift is not allowed to keep the gift for his/her own.

This policy is part of Grupo Coppel Integrity Program and any infringement of it must be reported through the available formal means.