



# CODE OF ETHICS AND CONDUCT FOR PROVIDERS

- I. **PURPOSE** This Code of Ethics for Providers underlines FibraShop's commitment to adopt best practices and ethical behavior, which must be followed by all providers who supply goods or services. We expect providers to uphold the same ethical values as the Company to build healthy, transparent, and sustainable relationships.

These practices reflect high ethical and moral standards focused on ensuring and preserving the image of FibraShop and its providers, and they are expected to apply throughout our commercial relationship, as they are fundamental to the way in which we operate.

## II. THE FIBRASHOP CULTURE

**Mission:** To grow quickly by taking advantage of the best consolidation opportunities in the Mexican commercial sector, built on our multiplatform concept. To offer maximum operating efficiency, generating high yields for our investors.

**Vision:** To revolutionize the shopping mall market by creating a flexible, multiplatform vehicle that meets consumer and lessor needs in Mexico. We have become the leading operator and largest owner of shopping malls in Mexico.

### Values:

- **Transparency and integrity:** Authenticity, honesty, and transparency in all our processes.
- **Passion:** Commitment and performance in everything we do.
- **Competitiveness and innovation:** Constant effort to imagine projects that will lead to improvements in our processes and quality of services.
- **Teamwork:** Share the knowledge, experience, and effort with our employees to reach our objectives.
- **Effectiveness:** To perform all our processes with precision and excellence.
- **Profitability:** To achieve results that will allow us to continue growing.

## III. PROVIDERS' RESPONSIBILITIES

FibraShop's providers must commit to the following:

- Perform their commercial activities in conformance with all applicable laws and standards.
- At all times maintain ethical behavior that allows legitimate and productive relationships to be established with their own providers and the companies with which they have a contractual relationship, acting objectively, honestly, transparently, loyally, respectfully, and collaboratively.
- Establish mechanisms that prevent corruption and bribery in the development of their activities, safeguarding the image and reputation of the company.
- Provide truthful and transparent information during contract negotiation and provider onboarding, not engaging in practices that impede good development of these processes.

- In performing their professional activities, maintain confidentiality of the information to which they have access as a consequence of their relationship with FibraShop.
- Perform their activities with commitment and responsibility, minimizing negative environmental impacts, in accordance with the Sustainability Report.
- Dignified and respectful treatment of everyone, without discriminating based on personal characteristics, sexual preferences, religious beliefs, politics, or social or economic conditions.
- Report all breaches or suspicions using the reporting channels established by FibraShop.

#### **IV. APPLICABLE PRINCIPLES IN THE PROVIDER'S COMMERCIAL ACTIVITY**

The Code of Ethics is based on the following principles, which providers that have a commercial relationship with FibraShop must maintain and apply:

##### **a. Integrity**

FibraShop does not accept fraudulent practices or any type of corruption in its commercial relationships. The following conduct by providers is unacceptable, and may lead to legal and contractual penalties:

- Offering any type of bribe, including giving or receiving money, gifts, or anything of value to unduly influence negotiations or any other dealings with governments, officials, clients, employees, or any other third party.
- Falsifying documents.
- Being involved in illegal activities or conduct, such as tax evasion, contraband, and money laundering, among others.

Providers must comply with all laws, rules, and regulations that prohibit corruption and money laundering. FibraShop has a zero-tolerance policy regarding any type of corruption, including but not limited to, kickbacks, bribery, or other illegal payments, or any other type of conduct that might be corrupt. FibraShop providers are strictly prohibited from giving, offering, promising, and authorizing, whether directly or indirectly, any handouts, concessions, or economic stimulus or things of value (in cash or in kind), with the goal of obtaining benefits or advantages of any type, influencing business or governmental decisions in relation to any of FibraShop's activities.

##### **b. Conflicts of interest**

A conflict of interest may occur when personal or third-party interests interfere with or come into the Company's decision-making. In the event of this type of situation, providers must do everything necessary to prevent conflicts of interest that might negatively impact the reputation, equity, or liability of FibraShop.

To prevent conflicts of interest and to provide solutions if required, all FibraShop providers are responsible for declaring any personal or other type of interest that might conflict with those of the Company. If a provider thinks there might be a conflict of interest that could interfere with performing their work or in their decision-making, they must report this immediately. A conflict of interest is not necessarily a violation of this Code of Ethics, but the



fact of not revealing it is a violation. All providers must refrain from obtaining, using, copying, modifying, or distributing protected or confidential information with the purpose of obtaining personal benefits for themselves or for third parties.

**c. Privileged and confidential information**

All FibraShop providers must protect and keep secret all information classified as confidential to which they might have access while performing their work. The information to which they have access is confidential or sensitive, unless there are clear indications that said information is public. Providers are required not to reveal, publish, disclose, assume possession of, transmit, communicate, share, or use, either directly or indirectly, the confidential information, or any knowledge or information about the nature, origin, purpose, characteristics, or purposes of said information.

**d. Human and labor rights**

FibraShop’s commitment to human rights also applies to all providers’ workers, therefore they must foster a suitable working environment characterized by respect and dignity for each person and worker with whom their employees interact. Furthermore, discrimination, harassment, threats, and retaliation must not be tolerated. FibraShop and its employees do not discriminate based on race, religion, gender, age, civil status, differing abilities, political opinion, social origin, sexual orientation, and/or any other reason, thus providing equal opportunities throughout all aspects of work and business.

FibraShop prohibits all types of physical, verbal, or written harassment related to disciplining workers.

Providers must comply with all applicable laws and regulations at the local and federal levels related to and impacting the exercise of human rights in the communities in which we operate, and they must comply with labor and social security obligations.

**e. Occupational health and safety**

FibraShop seeks to ensure high levels of occupational health, safety, and hygiene by implementing and following the legal requirements that govern such matters. We seek to prevent all occupational accidents, injuries, and diseases within our facilities and operations, through management’s leadership and workers’ participation. We are committed to complying with all laws in effect in matters of health, safety, and hygiene. Furthermore, preventive and corrective maintenance work is performed at the shopping malls that FibraShop operates, to encourage and foster health, safety, and hygiene among our tenants, employees, and clients, therefore providers must comply with the aforementioned standards, guaranteeing a safe and healthy work environment for their employees.

**f. Use of the Company’s assets** FibraShop trusts that its providers will use the material resources provided to them by the Company responsibly, reasonably, and

effectively, and in strict compliance with fulfilling and performing their functions. Providers will at all times refrain from incurring unnecessary, superfluous and/or excessive expenses, without compromising the efficiency of their work.

#### **g. Environment**

FibraShop has a commitment and responsibility to create a positive impact on the environment, in terms of energy and water consumption, waste generation, climate change, generation of emissions, and biodiversity, among other environmental matters.

Consequently, our providers must:

- Comply with the environmental legislation applicable to their products and services.
- Consider the impact to the environment caused by their activities, products, and services.
- Provide products and services with their respective environmental licenses and permits.

#### **h. Compliance with laws**

Providers express their commitment to comply with all laws, rules and regulations that apply, avoiding any conduct that might harm FibraShop's reputation.

- V. REPERCUSSIONS OF FAILING TO COMPLY WITH THE CODE** FibraShop trusts that our providers will voluntarily adhere to and comply with our Code of Ethics, our policies, and the law. Any breach of this Code of Ethics, our policies, or the applicable laws will have consequences depending on the seriousness of the breach.

Due to its characteristics the Code of Ethics cannot describe every possible situation that might arise. FibraShop's Ethics Committee is therefore the body responsible for reviewing the Integrity Program, and for penalizing violations of the Code of Ethics. Anything not covered by this Code of Ethics will be resolved by the Ethics Committee based on the overall integrity policy as provided for in Article 25 of the General Law on Administrative Responsibilities.

- VI. COMPLAINT LINE** If there are breaches or violations of this Code of Ethics, every FibraShop provider is responsible for filing a complaint by means of the e-mail provided below.

E-mail: [lineaetica@fibrashop](mailto:lineaetica@fibrashop)



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**COMMITMENT LETTER TO COMPLY WITH THE CODE OF ETHICS AND CONDUCT FOR PROVIDERS**

I state that I have read and understood this Code of Ethics, and I agree to fully comply and abide by it. I understand the consequences that might occur due to breach or failure to comply.

Location and date: \_\_\_\_\_

Provider's company name: \_\_\_\_\_

Name of the legal representative: \_\_\_\_\_

Signature of the legal representative: \_\_\_\_\_