



# CODE OF ETHICS

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**MESSAGE FROM THE CHIEF EXECUTIVE OFFICER****Dear Team Members:**

This Code of Ethics and Conduct (hereinafter the “Code” or the “Code of Ethics”) will apply to all team members of FibraShop Administración, S.C. (“**FibraShop Administration**”), Prestadora de Servicios para Centros Comerciales, S.A. (“**Service Provider**”) and/or any other companies or firms that provide personnel management services in favor of: (i) CIBanco, S.A., Institución de Banca Múltiple, acting solely and exclusively as the fiduciary for Trust **F/00854** (“**FibraShop**”), (ii) CIBanco, S.A., Institución de Banca Múltiple, acting solely and exclusively as the fiduciary for Trust number **CIB /2861** (“**Puerta La Victoria**”), and (iii) Banco Invex, S.A., Institución de Banca Múltiple, Invex Grupo Financiero, acting solely and exclusively as the fiduciary for Trust number **3899** (“**La Perla**”).

This Code refers to the fundamental values, general guidelines, basic principles, and compliance with the legislation that all employees of FibraShop Administración y Prestadora de Servicios must follow in their professional activities related to FibraShop, Puerta La Victoria, La Perla, and/or any other present or future project that FibraShop manages or in which it participate as an investor.

The Code is also the basis for establishing the standards of conduct that FibraShop employees must follow in their relationships and/or interactions with third parties with whom they have business relationships, and/or with government authorities or employees with whom they have any type of interaction while performing their professional activities.



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Our Code of Ethics establishes the principles by which FibraShop operates in the market, currently and in the future. Our team is deeply aware of its responsibilities to society and people, improving sustainability and protecting natural resources.

It is an ethical culture built on integrity over many years, therefore it is important that all FibraShop employees familiarize themselves and comply with this Code of Ethics. When we comply with the Code of Ethics, we not only strengthen our own activities; we also inspire confidence in our clients, bondholders, providers, business partners, and the communities where we operate.

Complying with this Code is mandatory, and any conduct that is inappropriate or contrary to its guidelines will result in the appropriate administrative and/or legal penalties.

Once you have read the Code of Ethics and cleared up any questions you might have, please indicate your commitment and agreement to comply with this Code by signing the Adhesion Letter attached at the end of this document, and give it to the Human Resources area.

**Salvador Cayón Ceballos**  
**Chief Executive Officer**

## **PURPOSE**

At FibraShop we strive to adhere to the highest standards of integrity and ethics, and we comply with all laws and regulations that apply to our commercial activities. Our Code of Ethics applies to all FibraShop employees and related parties, business partners, and service providers.

We expect our service providers and other business partners to act in accordance with this Code of Ethics. It is your responsibility to read it carefully and to understand it. FibraShop's Technical Committee and its auxiliary committees, directors, managers, and other team members must ensure that this Code of Ethics is distributed within their respective areas of responsibility, and that it receives due attention and follow-up.

This Code of Ethics, in conjunction with our other policies, plays an important role in building our main objective.

We encourage all employees to report any solicited activity or action they believe might violate the law, institutional policies, or this Code of Ethics, through the different institutional channels or e-mails. Any notification should be made to a line manager, the legal department, the human resources department, or through the complaint system established for this purpose.

With your help FibraShop can fulfill its commitment to ethics, integrity, and compliance with applicable laws and internal policies.

## **OUR 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 tenant needs in Mexico. We have become the leading operator and largest owner of shopping malls in Mexico.

### **Values**

We are committed to helping our employees develop by encouraging respect for our values. We exhibit our beliefs through our conduct:

### **Integrity**

Authentic and honest in all our processes.



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**Passion**

Commitment and performance in everything we do.

**Competitiveness and innovation**

We focus on constantly imagining projects that will lead to improved processes and service quality.

**Teamwork**

We share our knowledge, experience, and effort with our employees to reach our objectives.

**Effectiveness**

We strive to be proactive and demanding with our objectives.

**OUR PEOPLE**

**Human rights**

FibraShop’s commitment to human rights applies to all operations and all employees. We encourage our clients, suppliers, and service providers to share in our commitment to uphold human rights.

We 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. The following list includes, but is not limited to, the fundamental human rights whose observation and protection we prioritize:

**Discrimination and harassment prohibited**

FibraShop prohibits any type of discrimination among its employees, business partners, clients, providers, or other individuals or communities in which we operate. 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 any type of physical, verbal, or written harassment related to disciplining workers.

**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.



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## RESOURCES

### Privileged and confidential information

All FibraShop employees must protect and keep secret all information classified as confidential to which they might have access while performing their work. The information to which employees have access must be assumed to be confidential or sensitive, unless there are clear indications that said information is public.

Employees 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, without prior written authorization from FibraShop.

For the purposes of safeguarding the information to which employees have access, all precautions must be taken and employees must agree to comply with the protocols and systems developed to protect any confidential information, following the recommendations that might be established, from time to time, by the legal, human resources, or information technology area in regard to mechanisms to protect information safety.

### Use of the Company's assets

FibraShop trusts that its employees 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. Employees will at all times refrain from incurring unnecessary, superfluous and/or excessive expenses, without compromising the efficiency of their work. They will also abide by the travel or expense policies issued by FibraShop.

## LEGALITY

### Legal compliance

FibraShop and its employees state their commitment to comply with all applicable laws, rules, and regulations.

### Conflicts of interest and business opportunities

Our employees must not participate in any activity that might interfere in the performance of their functions at the Company.

A conflict of interest may occur when personal or third-party interests interfere with or come into the decision-making of the Company. In the event of this type of situation, employees 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 employees are responsible for declaring any personal or other type of interest that might conflict with the Company's interests. If an employee 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 to their immediate superior, and refrain from participating in the matter in question until it is resolved by the Ethics Committee. If an employee would like to file a complaint anonymously, possible conflicts of interest may be reported using the complaint system created for that purpose.

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 employees 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.

### **Anticorruption and policies to prevent money laundering**

All FibraShop employees, regardless of their position or the job they perform, must comply with all laws, rules, and regulations prohibiting 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 employees are strictly prohibited from giving, offering, promising, and authorizing, either directly or indirectly, any handouts, concessions, or economic stimulus or items 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 with clients, providers, authorities, and/or any other third party.

This prohibition must be interpreted in the broadest sense, and applied to anyone who represents us.

FibraShop must also comply with current and applicable legislation in matters of preventing money laundering, in a timely and appropriate manner. Employees are therefore prohibited from participating in money-laundering activities or doing anything that might facilitate such activities.

If you suspect that an employee is or might be engaging in illegal behavior or transactions, you should report this to your hierarchical superiors, or through the complaint system established for this purpose.

### **Responsibility in integrity and information content**

FibraShop employees that are responsible for preparing accounting, financial, or any other type of report, must do so with integrity, correctly, and in a timely manner, in accordance with accounting standards in effect, and as established by applicable laws and regulations in securities matters, avoiding any act or omission that might result in erroneous interpretation of the information that is disclosed.

### **Rules regarding political contributions**

FibraShop is committed to complying with electoral laws. Cash, in-kind contributions, or donations to political parties, electoral campaigns, or any individual or company



involved in political activities is therefore strictly prohibited. Making any type of contribution to political parties or candidates in public positions is expressly prohibited.

### **Conduct that may constitute a crime**

As part of its commitment to having a culture of business integrity and honesty, all FibraShop employees, regardless of their hierarchical level, are strictly prohibited from engaging in any behavior involving fraud, extortion, bribery, or anything else that might result in criminal liability to FibraShop as a company, or that might constitute a crime against FibraShop.

All employees are responsible for not engaging in this type of behavior, and for immediately reporting any conduct of this type of which they are aware, to their hierarchical superior, or through the complaint mechanisms implemented for this purpose.

## **COMPLIANCE**

### **Disciplinary actions**

- FibraShop trusts that our employees will voluntarily adhere to and comply with our Code of Ethics, our policies, and the law. Nevertheless, any breach of this Code of Ethics, our policies, or applicable laws, will have consequences depending on the seriousness of the breach.

### **Ethics Committee**

Due to its characteristics the Code of Ethics cannot describe every possible situation that might arise in employees' day-to-day work. The Ethics Committee is therefore the body responsible for imposing penalties if the Code of Ethics is violated, and it is also the body responsible for reviewing the Integrity Program. The Ethics Committee is comprised of directors from each area, and another from the Human Resources Department.

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.

### **Complaint system**

If breaches or violations to this Code of Ethics are observed, it is the responsibility of each FibraShop employee to report it to their immediate supervisor, or through the complaint system implemented for that purpose. If you are aware of an event that breaches this Code, you should send an e-mail to the following confidential address:

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



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Employees are advised to speak with their immediate supervisor or the area director in the event of questions about the situation they think might be a matter for complaint. All complaints will be addressed and investigated thoroughly.

FibraShop agrees to protect the rights of anyone who reports concerns in good faith through the information provided to their supervisor, or through the complaint system. It is important that personnel reporting any conduct of this type cooperate with the investigations. Nevertheless, it is important to emphasize that the information provided must be based on demonstrable and true facts, and that they do not abuse this means of communication. Retribution is prohibited against anyone who files a complaint in good faith, reports what they believe to be a violation of our Code of Ethics, or who cooperates with an investigation of a possible violation or improper conduct; however, if it is found that the complaint has no basis and was made to harass someone or in retaliation against them, then the person who filed that complaint will be responsible for the consequences that might arise from false or unfounded statements.

**LETTER OF ADHESION**

By means of this Letter, 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 with the Code of Ethics.

Employee Name: \_\_\_\_\_

Employee Number: \_\_\_\_\_

Area: \_\_\_\_\_

Position: \_\_\_\_\_

Acceptance and agreement:

Name and signature:

**1. REFERENCE DOCUMENTS:**

<b>DOCUMENTS</b>	<b>CODE</b>
NA	NA

**2. RECORDS:**

<b>RECORDS</b>	<b>RETENTION TIME</b>	<b>RESPONSIBLE FOR RETENTION</b>	<b>RECORD CODE</b>
FSIntranet	Undefined	Systems Management	Does not apply

**3. CHANGES TO THIS VERSION:**

<b>VERSION NUMBER</b>	<b>DATE UPDATED</b>	<b>CHANGE DESCRIPTION</b>
1	January 2022	Does not apply

Authorization date:

<b>PREPARED BY:</b>	<b>REVIEWED BY:</b>	<b>AUTHORIZED BY:</b>
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